



INFORMATION DISSEMINATION POLICY

P-37/2019

Department Responsible: Legal Counsel

OBJECTIVE:

Describe FUNBIO's policy for the dissemination of information to the general public.

ORGANIZATIONAL SCOPE:

This policy applies exclusively to Funbio and covers all areas.

APPROVAL

Current version	Action	Date
1	Approved by the Advisory Board	April 25, 2019
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CONTROL OF VERSIONS

Version	Date	Prepared by	Status
0.1	April 18, 2019	Fábio Leite, Hara, Leitão, and Neviani	Hélio Alexandra Flávia Draft
1	April 25, 2019	Advisory Board	Approved

RELATED DOCUMENTS:

- Funbio Ethics Code;
- Procedures for Calls for Projects.

CONTACT:

Funbio's Legal Counsel can be contacted by e-mail: asjur@funbio.org.br

Privacy: This document is public and will always be available on Funbio's website. It must not be edited or altered without prior consent.

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I. INTRODUCTION

1. Access to information is an instrument increasingly used by institutions as a means of increasing the effectiveness of their activities, as well as an instrument of accountability, transparency and integrity.
2. Currently access to information has been enhanced through the use of the internet, social networks and decentralized dissemination capacity. However, this potential can lead to distortions such as “fake news” that are no longer a “curious” phenomenon and can become a reputational problem even if it is based on fake news.
3. Anchored in the Funbio *Transparency and Ethics* values, this Information Dissemination Policy (P-37) aims to define the institutional guidelines so that the commitment to transparency and preservation of confidential information is institutionally addressed in all our actions

II. DECLARATION OF PRINCIPLES

4. Funbio recognizes and reaffirms the importance of maximizing access to information for all stakeholders.
5. Funbio recognizes that not all information may be shared and defines a clear list of exceptions that will be treated as confidential information.
6. Funbio understands that it is practically impossible to make all information available on its site, so partners and the public may request additional information that is not available on the site.
7. Funbio has a clear process for providing information that is not available on the website and recognizes the right of these requesters to an appeal process.
8. Funbio rejects the dissemination of false information of any kind and also understands that anyone who replicates information without proving its truth may be breaking the law, regardless of the means of disclosure.
9. Funbio recognizes that its employees have the right to disclose institutional or project information on their social networks, provided that they follow the guidelines of this Policy and separate personal opinions from institutional positions.
10. Funbio makes this Policy clear to all its partners and applies it to all projects.

III. INSTITUTIONAL STRUCTURES

11. The dissemination of official information from Funbio to the general public is the responsibility of the Communication Office.
12. The request for additional information that is not posted on the site may be met by any employee, provided it is not confidential information. In case of doubt regarding the confidentiality, Funbio employees should ask the Funbio Legal Counsel - ASJUR for guidance.
13. In the event that an external request for information is not met, the requester may request an appeal to the Funbio's Ethics Committee.

IV. GUIDANCE FOR THE DISSEMINATION OF INFORMATION

14. Funbio's preferred channel for information dissemination is its website (www.funbio.org.br), which may be complemented by other forms of communication, digital or otherwise.
15. Except for the information listed as exceptions, all information Funbio has available may be disclosed, including information not published on the site, upon request.

V. LIST OF EXCEPTIONS

16. Funbio does not disclose information that may cause harm to third parties and considers the following list as exceptions to the Information Dissemination Policy:
 - I. **Personal information from staff and partners** - this category includes e-mail messages, documents, address, telephone, medical or leave of absence information, selection process information, promotions, notifications or investigations underway by the Ethics Committee or Department of Human Resources, with observance of Law 13.709/2018.
 - II. **Ethics Committee** - Funbio does not disclose content information about the work of the Ethics Committee, except for its annual activity report, which is published on the Funbio website. Complainants will receive information directly from the Committee.
 - III. **Legal Advice** - Funbio does not provide access to information on communications between its legal counsel and other attorneys on ongoing or past legal issues.
 - IV. **Security** - Funbio does not give access to any information that could compromise the physical security of its employees, counselors, contractors, supporters and their families.

- V. **Information Covered by Non-Disclosure Agreements** - In certain cases Funbio signs non-disclosure agreements with other partners. In such cases the information will not be accessible until the Agreement expires or for a later period.
- VI. **Third Party Information Provided as Confidential** - Funbio does not disclose third party information that has been provided in confidence.
- VII. **Administrative Matters** - Funbio does not disclose information on internal administrative procedures unless such disclosure is authorized in the administrative document itself.
- VIII. **Deliberative Information** - Funbio does not disclose information about the deliberations in its Board, the discussions of its coordination and the Technical Committees. This exception has the purpose of preserving the opinions and debates that normally occur in these forums and includes supporting documents for these deliberations.
- IX. **Raw data and internal analytics** - Funbio makes decisions based on verifiable data and facts. To make this happen, internal analyzes are made and raw data of various types is generated. This data is not disclosed except for specific presentations or Funbio publications.
- X. **Financial Information** - Funbio does not disclose financial information about budgets, including procurement processes, financial investments and results, other than those disclosed annually in the annual balance sheet and audited by an external firm. Financial information on Funbio-funded projects can be found in the annual report on the website and is commonly disclosed by project teams.

V.1 PREROGATIVES OF THE EXECUTIVE SECRETARIAT AND THE ADVISORY BOARD

- 17. Despite the exceptions described above, Funbio's Executive Secretariat and/or Advisory Board has the prerogative to share information with partners in exceptional and justified cases and, as far as possible, to use aggregate data/information.
- 18. Funbio's Executive Secretariat and/or Advisory Board also have the prerogative to make information confidential - when it would normally not be the case - if there is an assessment that disclosure could harm third parties.

V.2 REDACTING PARTS OF DOCUMENTS

- 19. One solution Funbio may use is to suppress sensitive parts of documents (redacting) that are on the above list of exceptions, making it possible to disclose the rest of the content.

VI. INFORMATION ON PROJECTS

20. As a project implementer, Funbio has a wealth of information about the projects. General information about each can be found on the Funbio website.
21. Full information on these projects follows the list of exceptions for disclosure in the previous section.

VI.1 PROJECTS (OR SUBPROJECTS) SELECTED THROUGH CALLS FOR PROPOSALS

22. Projects (often referred to as subprojects) funded through calls for proposals should have the following information publicly available: Objectives, components, goals, indicators, aggregate budget, executing institution, and partners¹.
23. Calls for proposals may provide for the publication of all projects submitted, approved or not.

VI.2 GEF AND GCF IMPLEMENTATION PROJECTS

24. Funbio has been a National GEF Project Implementation Agency since 2015 and a National GCF Accredited Entity since 2019. For these two funds, specific information disclosure rules should be followed.
25. Projects approved under these funds will be made available in full on the Funbio website, including safeguard reviews and gender mainstreaming. In cases where the project document is in English (official languages of these two funds) Funbio may or may not have a translated version.
26. The project monitoring technical reports prepared by the executing institutions will be made available on the Funbio website, however, attachments may be shared only upon request.
27. Funbio's website will provide information on the disbursement of resources to projects as well as the amount of resources allocated for the reports that have already been delivered and analyzed by Funbio.
28. Letters from the external auditors of the executing institution will be posted on the website annually. Funbio may also provide only the link to these documents on the website of these institutions.
29. The Funbio website will also be used to publicize online public consultation processes for these projects prior to their final submission to both GEF and GCF funds. It will be used for the dissemination of social and environmental safeguard analyzes, project gender analyzes and their respective management plans. In these

¹ Required for projects with calls launched as of the approval of this Policy.

cases, in addition to disclosure, Funbio will also observe the GCF **minimum** disclosure deadlines prior to its Board meetings, namely 30 days for Category B/1-2 projects. These documents will always be published in Portuguese and English.