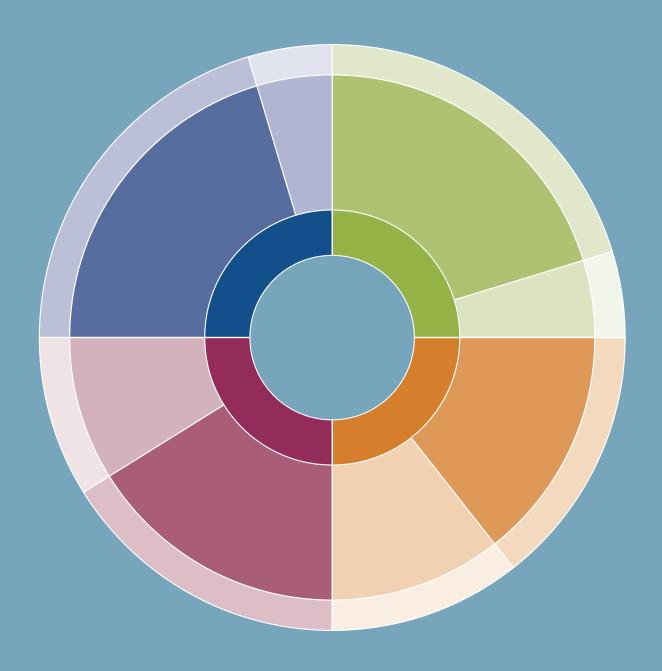
# DFI Transparency Tool





# **DFI TRANSPARENCY TOOL**

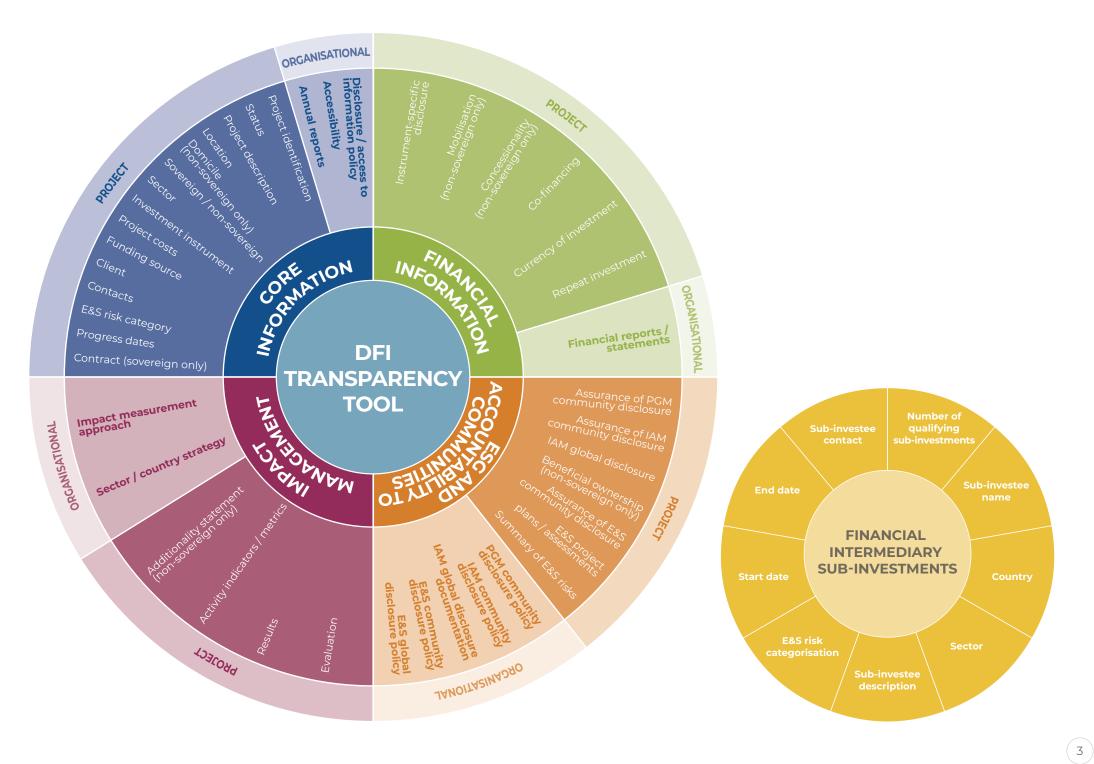
Publish What You Fund has developed the DFI Transparency Tool to improve the systematic and timely disclosure of relevant information by development finance institutions (DFIs). The tool is designed to meet two functions:

- Provide detailed, granular guidance to DFIs on the information they should disclose.
- Provide the framework for analysis by which Publish What You Fund will measure DFI transparency in an initial public pilot index in late 2022.

This DFI Transparency Tool is the culmination of two years of in depth and collaborative research assessing the disclosure practices of the world's leading multilateral and bilateral DFIs. Further details of our research findings and the rationale for the tool can be found in our <u>Advancing DFI Transparency report</u>.

DFIs can improve their transparency by providing comparable, timely, and relevant information for use by a range of stakeholders in line with the specific information fields included in the tool.





# **CORE INFORMATION**

### ORGANISATIONAL LEVEL INDICATORS

Does the development finance institution (DFI) have a disclosure or access to information policy?

For bilateral DFIs does the disclosure/ access to information policy include reference to a Freedom of Information Act (FOIA)? Publish What You Fund completes an assessment of the quality of disclosure policies based on the overarching approach taken in the Global Right to Information (RTI) Rating.

FOIA: The definition used in the Global RTI Rating is that it has to be a law in the strict sense. It must include the right of access to information, this right has to be enforceable and there must be compliant, court and high court appeal possibilities. Decrees are included if they meet the same standards. In addition, the FOIA must be in use for at least the executive part of the government; therefore, FOIAs which are only adopted, approved or still in draft form are not counted.

The following characteristics are assessed for disclosure / access to information policies:

Presumption of disclosure: to score for this indicator, a disclosure policy must have a specific clause that states disclosure as the rule, thereby requiring a compelling reason for non-disclosure.

Limitations on commercially sensitive information and sensitive internal deliberations information: to score on this indicator, non-disclosure clauses related to these matters must (a) clearly define a legitimate interest that is being protected, (b) be limited to protecting that interest against harm, and (c) be subject to a public interest override. To score on this indicator all three sub-criteria must be met.

Independent appeals process: to score for this indicator, information requesters must have a right to lodge an appeal regarding the application of the disclosure policy with an independent appeals body which includes individuals that are independent from the organisation and which has the power to make decisions on how the policy has been applied in any particular case.

# 1. Disclosure / access to information policy

Does the DFI disclose its data in an accessible manner?

The overall accessibility of data through the organisation's portals, project databases or searchable data sources. These are scored using three criteria: 1) the portal allows free, bulk export of data, 2) it contains detailed disaggregated data, 3) the data is published under an open licence.

# 2. Accessibility

INDICATOR	SURVEY QUESTION	DEFINITION	ADDITIONAL DEFINITIONS AND NOTES
3. Annual reports	Does the DFI disclose an annual report?	Annual reports outline basic (normally aggregate) information about how money was spent in the previous year, broken down by sector and/or country. This should be backward looking.  Annual reports that are up-to-date within their regular cycle, i.e. the organisation publishes an annual report a year behind, the most recent document within this time frame is accepted.	To score for this indicator, the annual report needs to include details of where the organisation is spending its resources and the information needs to cover current activity period.  Integrated reports that combine annual reporting and financial reporting are accepted for this field.
	PROJE	CT LEVEL INDICATORS	
4. Project identification	Does the DFI disclose a project title?  Does the DFI disclose a unique identifier for the project?	The project title is its name. This is preferably the formal name of the activity, but does not have to be. In the case of non-sovereign activities, the title may be given as the name of the investee company as long as it satisfies other requirements.  The title needs to be complete with any activity specific abbreviations or acronyms explained. General commercial abbreviations such as ltd. or s.a. are acceptable.  The unique identifier is a unique reference ID for the activity, e.g. a project number. It allows an activity to be referred to and searched for by a code, which can be used to retrieve the project from a database or filling system.	For non-sovereign projects the project title may be given as the client's name.  The project ID must be stated clearly on the page. It is not sufficient if it is only stated in the URL. It must be numeric or alpha-numeric.
5. Status	Does the DFI disclose the current status of the activity?	This shows the current status of the activity, e.g. whether the activity is currently under design, being implemented, has finished or has been cancelled.  For non-sovereign projects the status may be pending approval, active, completed, or similar.	
6. Project description	Does the DFI disclose a description of the activity?  Does the DFI disclose a project/activity objective/rationale?  Does the DFI disclose the expected outcomes of an activity?	The description of the activity is a meaningful descriptive text, longer than the title, explaining what the activity is.  A project rationale is the reason an activity is taking place. The rationale could be a narrative or a theory of change.  The expected outcomes are the development objectives that the activity intends to achieve. The expected outcomes may be reported as a narrative.	The description of the activity needs to contain a minimum of 80 characters in order to be considered a description rather than just a title.  The information can be contained in more than one web page, data field and/or document.

INDICATOR	SURVEY QUESTION	DEFINITION	ADDITIONAL DEFINITIONS AND NOTES
7. Location	Does the DFI disclose the region the activity takes place in?  Does the DFI disclose the country the activity takes place in?  Does the DFI disclose the sub-national location the activity takes place in?	Region: the region (e.g. sub-Saharan Africa) where an activity takes place.  Country: the country or countries where an activity takes place.  Sub-national location: information about where the activity is located within a country. This may be a province or city, or it could be geo-coded (whereby the precise longitude and latitude is published). It needs to be stated separately and explicitly.	For sub-national location, capital city of country/countries of activity will be accepted in instances where it is not possible to be more specific.
8. Domicile (non-sovereign only)	Does the DFI disclose the domicile of the investee?	The investee company's (the recipient of funds) place of incorporation.	
9. Sovereign / non-sovereign	Does the DFI disclose the activity as sovereign or non-sovereign?  Or  Does the DFI disclose the activity as public sector or private sector?	Sovereign projects are projects that have been financed with the guarantee of a sovereign entity (a national or sub-national government).  Non-sovereign projects are projects that have been financed without the guarantee of a sovereign entity (a national or sub-national government, or in some cases a municipality). Broadly, sovereign means public sector financing while non-sovereign therefore means private sector financing.	For institutions that exclusively do either sovereign or non-sovereign work, a statement to this effect is sufficient in place project-level disclosure.
10. Sector	Does the DFI disclose the sector of the activity?  Does the DFI disclose the sub-sector of the activity?	The sectors of the activity explain whether this is, for example, a health or education project. It does not count if it is just mentioned incidentally within the title or description. It needs to be stated separately and explicitly.	If projects are presented by sector on an organisation's website, it must be clearly stated whether the organisation works only in those sectors that are listed.
11. Investment instrument	Does the DFI disclose the investment instrument of an activity?	This shows the investment instrument of an activity, e.g. loan, equity investment, guarantee or other investment product. This needs to be explicitly stated per activity.	
12. Project costs	Does the DFI disclose the total investment cost?  Does the DFI disclose the DFI commitment for the investment?  Does the DFI disclose the disbursement for the investment?	The total cost of an investment at the time of signing, including financing from co-investors and from the project client.  DFI commitment refers to the financial commitment made by the DFI for the activity as a whole, for the lifetime of the activity. This is generally a high-level commitment rather than a detailed breakdown of the activity budget.  The disbursement is the actual size of the investment made by the DFI.	These should be disclosed in a consistent reporting currency.  The disbursement figure may vary from the committed amount due to changing conditions after the point of activity approval. Therefore, it should be reported separately from the committed amount.

INDICATOR	SURVEY QUESTION	DEFINITION	ADDITIONAL DEFINITIONS AND NOTES
13. Funding source	Does the DFI disclose the source of funding for the investment?	A statement on the origin of the funds for the investment. For example, a DFI may state that a project is funded by its own resources or other funds that it manages such as donor trust funds. Where there is more than one source of funding amounts per source is required.	
14. Client	Does the DFI disclose the name of the client?  Does the DFI disclose a description of the client?	The name of the client company receiving investment. This could include the name of the implementing agency or sponsor.  A narrative description of the client company receiving investment. This could include the description of the implementing agency or sponsor.	For sovereign operations the name of the implementing agency should be disclosed.  The description of the client needs to contain a minimum of 80 characters in order to be considered a description.
15. Contacts	Does the DFI disclose a relevant DFI contact?  Does the DFI disclose a relevant client contact?	A DFI contact shows who can be contacted in relation to this activity at the DFI. This does not have to be the contact information for an individual or project manager and could refer to a central contact or information desk.  A client contact shows who can be contacted in relation to this activity at the client. This does not have to be the contact information for an individual or project manager and could refer to a central contact or information desk.  These must be stated alongside the activity or on an obvious "contact us" link alongside the activity.	For sovereign operations contact information for the implementing agency should be disclosed in the same manner as described here.
16. E&S risk category	Does the DFI disclose the environmental and social (E&S) risk category of the activity?	The E&S risk rating of an investment or project provides an indication of the level of E&S risk associated with it. E&S risk categories are typically reported by either letter (e.g. A to C) or number (e.g. 1 to 3).	
17. Progress dates	Does the DFI disclose the following dates:  Disclosed date? Approval date? Last update date?	Disclosed date: the date at which basic project information has been disclosed to the public.  Approval date: the date at which an investment or project is approved by the DFI board.  Last update date: the date at which basic project information for a given investment or project was updated publicly.	Both month and year are required to score on this indicator in recognition of recipient countries needing to be able to map activities to their own financial year rather than the calendar year.
18. Contract (sovereign only)	Does the DFI disclose the investment contract for the activity?	Contract: the investment contract signed by the DFI and the client/borrower.	

# **IMPACT MANAGEMENT**

	ORGANISATIONAL LEVEL INDICATORS				
	Does the DFI publish a methodology explaining its approach to impact measurement?	An impact measurement approach should be either a standalone document or a dedicated section of the DFI website.			
	Does the DFI indicate which standards/initiatives it is aligned to?	The measurement approach should identify any alignment to recognised impact management standards (e.g. IRIS+ or			
	Does the DFI explain its approach to determining additionality?	Harmonised Indicators for Private Sector Operations) as well as the institution's approach to determining additionality in its activities.			
	Does the DFI explain its approach to determining impact attribution?	Development additionality addresses the non-financial aspects of a private sector DFI investment that would not be			
19. Impact measurement approach	Does the DFI have a policy on evaluation of investments?	provided by the private sector. This may include things such as provision of technical or governance advice as part of an investment.			
		Financial additionality refers to the finance that would otherwise not be provided (or leveraged) by the private sector due to real or perceived risks. This may be expressed through terms (such as loan tenor) not offered by the market.			
		Impact attribution is the relationship between the amount of finance provided and the impacts.			
		An evaluation policy outlines the DFIs approach to conducting evaluations, the level at which evaluations will occur (e.g. sector, region, country), and the factors that determine whether or not an investment will be evaluated.			
	Does the DFI publish sector or (multi-) country strategies?	A sector strategy outlines the approach an institution takes to investing in particular sectors. This may take the form of sectoral theories of change.	If the organisation follows the strategy of a parent or related organisation, a statement clarifying this is needed on		
20. Sector / country strategy		A (multi-)country strategy paper sets out the organisation's planned approach and activities in the recipient country, group of countries or region. For it to be accepted it needs to be a detailed document rather than just a paragraph on the organisation's website.	the website along with a link to the relevant strategy document. Similarly, if the organisation supports a country-led or developed strategy, this must be explicitly stated on the website and the link to the relevant strategy document needs to be provided.		

	PROJECT LEVEL INDICATORS			
21. Additionality statement (non-sovereign only)	Does the DFI identify the development additionality of its investment?  Does the DFI identify the financial additionality of its investment?	Development additionality addresses the non-financial aspects of a private sector DFI investment that would not be provided by the private sector. This may include things such as provision of technical or governance advice as part of an investment.  Financial additionality refers to the finance that would otherwise not be provided (or leveraged) by the private sector due to real or perceived risks. This may be expressed through	Recognising ongoing difficulties with measuring and proving additionality narrative statements will be accepted.	
		terms (such as loan tenor) not offered by the market.		
	Does the DFI disclose results indicators for the activity?	Project indicators are the key development outcomes that a project is expected to achieve.	Disclosed indicators that are defined at an institutional level will be accepted.	
22. Activity indicators / metrics	Does the DFI disclose metrics, definitions and methodologies for the	Metrics are the units of measurement within the indicators.		
	indicators?	Definitions and methodologies clarify the use and collection of indicators and metrics specific to the context of the activity.		
	Does the DFI disclose baseline data for identified indicators?	The baseline value for the indicator is the value of the indicator at the point that an activity commences.	If the activity has ended, then the actual results should be available	
23. Results	Does the DFI disclose a target value for the indicators?	A target value is the intended final value of an indicator.	within 12-months of ending.	
	Does the DFI disclose an actual/current value for the indicators?	A record of the achieved result for this period is the current value for the indicator for the most recent reporting period.		
	Does the DFI disclose whether an evaluation been completed for the	Evaluation and review documents consider, for example, what the activity achieved, whether the intended objectives were	Not all organisations carry out formal evaluations for all their activities. In	
	activity?  If so, does the DFI disclose the	met, what the major factors influencing the achievement or non-achievement of the objectives were and an assessment	cases where an evaluation has not occurred this should be clearly stated.	
24. Evaluation	evaluation?	of the impact, effect and value of the activity. This information may be on a specific evaluation section of the organisation's website.		
		If the activity under assessment is not completed but interim evaluation or review documents are available, these will be accepted.		

# **ESG AND ACCOUNTABILITY TO COMMUNITIES**

### ORGANISATIONAL LEVEL INDICATORS

25. E&S global disclosure policy

26. E&S community

disclosure policy

Does the DFI have a policy on early disclosure of investments?

Does the DFI clearly articulate what E&S documentation will be disclosed for medium and high-risk projects?

Does the DFI disclose the E&S policies/standards it applies (e.g. IFC Performance Standards or in-house policies) for its investments?

Does the DFI have a policy that specifies when a document should be translated and in which language?

Does the DFI disclose an explanation of project risk categorisation?

Does the DFI disclose a list of investment exemptions?

Global online E&S disclosure policy may be included in other documentation including E&S standards or institutional disclosure policies.

An early disclosure policy details the period of time that a DFI has to disclose a proposed investment or activity before it is considered for board approval.

The DFI should identify the minimum level of document disclosure expected for medium and high risk (category B and category A or equivalent) activities.

E&S policies/standards govern the DFI's management of E&S risk. Examples include the IFC Performance Standards and EBRD Performance Requirements.

E&S documentation should be in relevant languages so that it is accessible for stakeholders, especially project-affected communities. DFI policy should set forth when and how translation should happen, including when translation to the national language is required.

An explanation of project risk categorisation explains what attributes of a project contribute to the application of risk categories.

Investment exemptions are types of businesses (or sectors) in which the DFI is prohibited from investing.

If a DFI uses E&S standards other than its own, it should provide a link to the relevant documentation.

For DFIs that don't apply risk categorisation for projects the DFI should articulate what E&S documents will be disclosed for different projects.

Does the DFI have a community disclosure policy?

Does the policy require early disclosure to project-affected people?

Does the DFI clearly articulate what E&S documentation will be disclosed to project-affected people for investments?

Does the DFI have a free, prior, and informed consent (FPIC) policy?

A community E&S disclosure policy should establish the roles and responsibilities of the DFI and its client. It may be included as an aspect of other documentation including E&S standards or institutional disclosure policies.

An early disclosure policy details the period of time that a DFI has to disclose a proposed investment or activity to project-affected people before it is considered for board approval.

The DFI should identify the minimum level of document disclosure to project-affected people for its activities.

An FPIC policy outlines the way a DFI achieves participation and consultation in instances where its investment activities involve indigenous peoples.

A project-affected person is a person or household affected by direct economic and social impacts caused by a project.

INDICATOR	SURVEY QUESTION	DEFINITION	ADDITIONAL DEFINITIONS AND NOTES
27. IAM global disclosure documentation	Does the DFI disclose the availability of the Independent Accountability Mechanism (IAM) on its website?  Does the DFI IAM have a publicly available registry that publishes results, responses, or findings?	Global online IAM disclosure policy may be included as an aspect of other documentation including E&S standards or institutional disclosure policies.  A publicly available registry should record all cases, results, responses, and findings of the IAM. The DFI should provide a link to the public registry if not located on its website.	
28. IAM community disclosure policy	Does the DFI require clients to disclose the availability of the IAM to project-affected people where appropriate?  Or  Does the DFI state that it will disclose the availability of IAM to project-affected people?	Community IAM disclosure policy may be included as an aspect of other documentation including E&S standards or institutional disclosure policies.  The DFI should define the role and responsibilities between itself and its client for the disclosure of the availability of an IAM.	A project-affected person is a person or household affected by direct economic and social impacts caused by a project.
29. PGM community disclosure policy	Does the DFI require clients to disclose the availability of the project-level grievance mechanism (PGM) to project-affected people where appropriate?  Or  Does the DFI state that it will disclose the availability of the PGM to project-affected people?	Community PGM disclosure policy may be included as an aspect of other documentation including E&S standards or institutional disclosure policies.  The DFI should define the role and responsibilities between itself and its client for the disclosure of the availability of a PGM.	A project-affected person is a person or household affected by direct economic and social impacts caused by a project.
	PROJEC	CT LEVEL INDICATORS	
30. Summary of E&S risks	Does the DFI disclose a summary of E&S risks for an activity?  Are E&S standards triggered by the project identified?	A summary of E&S risks may take the form of either a non-technical summary or a narrative description of the E&S aspects of an activity.  E&S standards govern the DFI's management of E&S risk.  Examples include the IFC Performance Standards and EBRD Performance Requirements.	For non-sovereign projects the project title may be given as the client's name.  The project ID must be stated clearly on the page. It is not sufficient if it is only stated in the URL. It must be numeric or alpha-numeric.
31. E&S project plans / assessments	Does the DFI disclose what E&S documentation was produced for the activity?  Does the DFI disclose all produced E&S documents for the activity?	The DFI should list all E&S documents that were produced for an activity, in line with institutional and national guidelines.  At a minimum, either an Environmental and Social Impact Assessment (ESIA), a summary Environmental and Social Management System (ESMS), or a summary of the key E&S risks, impacts and mitigation should be disclosed.  All produced E&S documents should be disclosed.	

INDICATOR	SURVEY QUESTION	DEFINITION	ADDITIONAL DEFINITIONS AND NOTES
	Does the DFI state if disclosure of the activity to projected-affected people was required?	Assurance of community disclosure is defined as the DFI stating the date, place, method, and content of community disclosure of the funded activity. Community disclosure	Assurance of community disclosure may be located in supplementary E&S documentation such as a stakeholder
	If yes, then:	may be completed by the DFI, the client (or implementing partner), or by an identified independent third party.	engagement plan (SEP).
	Does the DFI state the date of community E&S disclosure?		
32. Assurance of E&S community disclosure	Does the DFI state the place of community E&S disclosure?		
	Does the DFI state the method of community disclosure?		
	Does the DFI state what documentation was disclosed?		
	Does the DFI identify the language of disclosure to project-affected people?		
33. Beneficial ownership	Does the DFI identify the main shareholders of the client company?	The identity of the shareholders holding above 10% of total shares of client companies should be disclosed.	Beneficial ownership statements at the time of investment are accepted.
(non-sovereign only)	Does the DFI disclose a beneficial ownership statement?	A statement regarding the ultimate beneficial ownership of client companies should be disclosed. An ultimate beneficial owner is the person that is the ultimate beneficiary when an institution initiates a transaction.	
34. IAM global disclosure	Does the DFI disclose the presence of the IAM on the DFI project page?	The presence of an IAM should be disclosed on the project page of each activity.	
	Does the DFI state if disclosure of the presence of an IAM to projected- affected people is required?	Assurance of community disclosure is defined as the DFI stating the date, place, method, and content of community	
	If yes, then:	disclosure of an IAM. Community disclosure may be completed by the DFI, the client (or implementing partner), or by an identified independent third party.	
	Does the DFI state the date of disclosure of the presence of an IAM to project-affected people?		
35. Assurance of IAM community disclosure	Does the DFI state the place of disclosure of the presence of an IAM to project-affected people?		
	Does the DFI state the method of disclosure of the presence of an IAM to project-affected people?		
	Does the DFI state the language of disclosure of the presence of an IAM to project-affected people?		

INDICATOR	SURVEY QUESTION	DEFINITION	ADDITIONAL DEFINITIONS AND NOTES
36. Assurance of PGM community disclosure	Does the DFI state if disclosure of the presence of a project-level grievance mechanism (PGM) to projected-affected people is required?  If yes, then:  Does the DFI state the date of disclosure of the presence of a PGM to project-affected people?  Does the DFI state the place of disclosure of the presence of a PGM to project-affected people?  Does the DFI state the method of disclosure of the presence of a PGM to project-affected people?  Does the DFI state the language of disclosure of the presence of a PGM to project-affected people?	Assurance of community disclosure is defined as the DFI stating the date, place, method, and content of community disclosure of a project-level grievance mechanism.  Community disclosure may be completed by the DFI, the client (or implementing partner), or by an identified independent third party.	

# **FINANCIAL INFORMATION**

**INDICATOR** 

ORGANISATIONAL LEVEL INDICATORS				
	Does the DFI disclose audited financial reports/statements?	The organisation's annual audit of its activities is an official inspection of the accounts and activities of this organisation, typically by an independent body.	A formally approved audit of annual accounts is required to score on this indicator.	
37. Financial reports / statements		Audits up to date with regular audit cycles are accepted, i.e. if the organisation publishes biennial audits, the most recent document within this time frame is accepted.	Audits conducted by official government agencies such as State Audit Offices or Controller General Reports are accepted for this indicator.	
			Integrated reports that combine annual reporting and financial reporting are accepted for this field.	

PROJECT LEVEL INDICATORS				
38. Repeat investment	Does the DFI disclose whether an investment is a repeat investment?	Whether or not the DFI has made a prior investment with the same client. This is inclusive of new and additional projects with the same client.	A yes/no answer would be sufficient. Ideally, in the case of yes, a link to prior investments would be provided.	
39. Currency of investment	Does the DFI disclose the currency that the investment is made in?	The currency that the investment is made in.	This information should be disclosed explicitly and easily identifiable from e.g. total project cost or commitment amount.	
40. Co-financing	Does the investment have co-financers or guarantors?  If yes, then:  Does the DFI disclose the identity of the co-financers?  Does the DFI disclose the amount of financing provided by each co-financer?	Co-financers are other investors involved in financing an activity as part of syndication or a package offered to the client as an integrated/coordinated financial solution. Previous or future investors are not included.  Identification of co-financers should include the full client name of involved parties.  The amount of finance provided by each co-financer.		
41. Concessionality (non-sovereign only)	Does the DFI disclose how much of the DFI investment amount was concessional?  Does the DFI disclose why concessional finance was necessary?	Concessional finance may be grant elements of an element or subsidies attached to an investment managed or provided by the DFI. The total amount of concessional finance should be disclosed.  A statement regarding the reason concessional finance was necessary for a given investment may be given in narrative form.  In cases of no concessionality, this data field should be reported as 0 (zero).		

	INDICATOR	SURVEY QUESTION	DEFINITION	ADDITIONAL DEFINITIONS AND NOTES
	42. Mobilisation (non-sovereign only)	Does the DFI disclose how much private finance was mobilised?  Does the DFI disclose how much DFI finance was mobilised?	The amount of private finance that is mobilised by an investment. Mobilisation may be reported according to either Organisation for Economic Co-operation and Development (OECD) or Multilateral Development Bank (MDB) methodologies. In either case, the reporting methodology should be identified.  The amount of DFI finance that is mobilised by an investment. Mobilisation may be reported according to either OECD or MDB methodologies. In either case, the reporting methodology should be identified.  In cases of no mobilisation, this data field should be reported as 0 (zero).	
		Equity  Share of equity: does the DFI disclose what percentage of the client company was purchased through the investment?	Share of equity: the share of a company purchased by an equity investment.	
		Debt	Interest rate: the interest rate applied to a loan investment.	
	43. Instrument-specific disclosure	Interest rate: does the DFI disclose what interest rate was charged for the loan?	Loan tenor: the repayment duration of a loan investment.	
		Loan tenor: does the DFI disclose what the length of the loan is?		
		Guarantees	Length of guarantee: the length of time a guarantee/	
		Length of guarantee: does the DFI disclose what the length of the guarantee is?	insurance is valid for.	

# FINANCIAL INTERMEDIARY SUB-INVESTMENT DISCLOSURE

44. Number of qualifying sub-investments	Does the DFI disclose the number of sub-investments that qualify for disclosure?	Sub-investments made through banks qualify for disclosure if the DFI is materially exposed to them and they are:  a) High risk (category A or equivalent), or  b) Larger than thresholds set out in the Equator Principles (version 4).  All sub-investments made through funds (such as, venture capital funds, private equity funds, and debt funds) qualify for disclosure.	
45. Sub-investee name	Does the DFI disclose the name of the sub-investee?	The name of the sub-investment company receiving investment from the financial intermediary.	In some jurisdictions disclosure of this data field is reliant on consent from the sub-investee. In cases where consent is not granted this should be stated explicitly with reference to the relevant legislation that prevents disclosure.
46. Country	Does the DFI disclose the country of the sub-investee?	The country or countries of operation that the investment will be utilised in.	In some jurisdictions disclosure of this data field is reliant on consent from the sub-investee. In cases where consent is not granted this should be stated explicitly with reference to the relevant legislation that prevents disclosure.
47. Sector	Does the DFI disclose the sector of the sub-investee?	The sectors of the activity explain whether this is, for example, a health or education project. It does not count if it is just mentioned incidentally within the title or description. It needs to be stated separately and explicitly.	In some jurisdictions disclosure of this data field is reliant on consent from the sub-investee. In cases where consent is not granted this should be stated explicitly with reference to the relevant legislation that prevents disclosure.
48. Sub-investee description	Does the DFI disclose a description of the sub-investee?	A narrative description of the sub-investee.	In some jurisdictions disclosure of this data field is reliant on consent from the sub-investee. In cases where consent is not granted this should be stated explicitly with reference to the relevant legislation that prevents disclosure.  The description of the sub-investee needs to contain a minimum of 80 characters in order to be considered a description.

INDICATOR	SURVEY QUESTION	DEFINITION	ADDITIONAL DEFINITIONS AND NOTES
49. E&S risk categorisation	Does the DFI disclose the E&S risk category of the sub-investment?	The E&S risk rating of a sub-investment or project provides an indication of the level of E&S risk associated with it. E&S risk categories are typically reported by either letter (e.g. A to C) or number (e.g. 1 to 3).	In some jurisdictions disclosure of this data field is reliant on consent from the sub-investee. In cases where consent is not granted this should be stated explicitly with reference to the relevant legislation that prevents disclosure.
50. Start date	Does the DFI disclose the start date of the sub-investment?	The date at which an investment or project begins operation, or funds are dispersed.	In some jurisdictions disclosure of this data field is reliant on consent from the sub-investee. In cases where consent is not granted this should be stated explicitly with reference to the relevant legislation that prevents disclosure.  Both month and year are required to score on this indicator in recognition of recipient countries needing to be able to map activities to their own financial year rather than the calendar year.
51. End date	Does the DFI disclose the end date of the sub-investment?	The date at which the investment or project ends for the financial intermediary. This could include project completion dates, debt repayment dates, or equity exits.	In some jurisdictions disclosure of this data field is reliant on consent from the sub-investee. In cases where consent is not granted this should be stated explicitly with reference to the relevant legislation that prevents disclosure.  Both month and year are required to score on this indicator in recognition of recipient countries needing to be able to map activities to their own financial year rather than the calendar year.
52. Sub-investee contact	Does the DFI disclose a relevant sun- investee contact?	This shows who can be contacted in relation to this activity at the sub-investee. This does not have to be the contact information for an individual or project manager and could refer to a central contact or information desk.	In some jurisdictions disclosure of this data field is reliant on consent from the sub-investee. In cases where consent is not granted this should be stated explicitly with reference to the relevant legislation that prevents disclosure.