



Transparency Policy

This document is as approved by the REC Caucasus executive Body (Collegial Trio) and is set out at the end of the document.



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1. Background

The transparency policy, which incorporates the Standard Operating Procedure (SOP) on information disclosure, is established to facilitate the development of controls that will aid in the promotion and maintenance of transparency within REC Caucasus, applied both internally (among staff, management, and Board) and externally (with partners, grantees, donors, beneficiaries, and the public). It is the intent of REC Caucasus to promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of disclosure practices and conduct of information sharing.

REC Caucasus Management is responsible for the promotion and maintenance of transparency, proper disclosures, and other openness practices. Transparency is defined as the intentional, accurate, and timely representation and sharing of material facts—both internally and externally—for the purpose of building and sustaining trust with all stakeholders and enabling informed decision-making.

Each member of the REC Caucasus management team will be familiar with the types of information that should be disclosed within his or her area of responsibility and be alert for any indication of non-transparency. Any non-transparency that is detected or suspected must be reported immediately to the Director, who coordinates all investigations with the Board and other affected areas, both internal and external.

2. Purpose

This Policy, incorporating the Standard Operating Procedure (SOP) on information disclosure, outlines the processes for handling requests for information and ensuring proactive disclosure of environmental and organizational information held by REC Caucasus. It aims to promote transparency, build stakeholder trust, and facilitate informed decision-making in line with the Aarhus Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters. By providing timely, accurate, and accessible information, REC Caucasus supports sustainable development, public participation, and environmental governance in the South Caucasus region.

Transparency is the default approach, with exceptions strictly limited to those explicitly permitted under the global climate finance mechanisms and applicable laws. The policy ensures compliance with international transparency norms, best practices of climate funds and global climate finance mechanisms as well as those of respective multilateral organizations, and applies principles such as non-discrimination, reasonableness, and public interest balancing. The Policy and integrated SOP cover both reactive (request-based) and proactive disclosure to enable any person to access information without needing to state an interest.

3. Scope

The policy applies to all information held by REC Caucasus, including but not limited to:

- Environmental information (e.g., data on air, water, soil quality; emissions; biodiversity; project impacts; policies, plans, and reports related to environmental matters);
- Organizational information (e.g., annual reports, financial statements, governance documents, project updates, and stakeholder engagement records).

This Policy covers requests from any member of the public, including individuals, NGOs, businesses, governments, and other stakeholders. The procedure applies to all REC Caucasus employees,

contractors, recipients of grants and sub-grants from REC Caucasus, and branch offices in Georgia, Armenia, and Azerbaijan.

Exclusions include information protected by law (e.g., personal data under data protection laws/regulations) or where disclosure would adversely affect confidentiality of proceedings, commercial secrets, or third-party intellectual property. Emissions-related data overrides most exceptions. Where information falls under an exception, the organization shall balance confidentiality with public interest considerations and apply the narrowest interpretation of the exception.

Nevertheless, in alignment with requirements of funding agencies (such as Adaptation Fund), financial information related to project execution – such as budgets, expenditures, audit reports, and financial statements – shall be publicly disclosed and is not subject to the exclusions in order to ensure transparency in the use of funds, with mechanisms for tracking funds from receipt to end-use.

The policy does not apply to information or data not held by REC Caucasus. In such cases (incl. cases where responding to the request necessitates REC Caucasus accessing and processing data maintained by the third parties), requesters shall be directed to appropriate sources if known.

4. Objectives of the policy

Through this Policy, REC Caucasus aims to:

- Promote transparency, accountability, and integrity in all activities.
- Enhance stakeholder confidence and participation.
- Facilitate knowledge sharing and learning.

5. Definitions

Environmental Information: Any information in written, visual, aural, electronic, or other material form on the state of environmental elements (e.g., air, water, soil, biodiversity); factors affecting them (e.g., substances, energy, noise); measures or activities (e.g., policies, plans, legislation, economic analyses); reports on the state of the environment; and impacts on human health, safety, or cultural sites.

Public: Any natural or legal person, including associations, organizations, or groups, without discrimination based on citizenship, nationality, or domicile.

Public Concerned: Those affected, likely to be affected, or having an interest in the matter, including NGOs or other civic groups promoting environmental protection.

Proactive Disclosure: Voluntary and regular release of information without a specific request.

Reactive Disclosure: Release of information in response to a specific request submitted by any organization or member of the public.

Request: Any inquiry for information submitted in writing (e.g., email, form) or orally (e.g., phone, in-person), without requiring justification.

Transparency Focal Point: Designated staff member in the Administration and Finance Department responsible for coordinating information disclosure.

6. Responsibilities

Executive Director: Oversees overall compliance, approves policy revisions, and resolves appeals related to transparency or disclosure of information.

Transparency Focal Point: (Finance and Administrative Management Department): Receives and processes requests, evaluates eligibility, coordinates responses, maintains records, and ensures proactive disclosures. Provides annual training to staff.

Managers of Programmes and Projects: Ensure relevant information in their functional/thematic areas is accurately prepared for disclosure and assist in evaluations of requests for information (in order to establish that realizing the requested information does not contradict the law).

All REC Caucasus Staff: Report potential requests to the Transparency Focal Point, maintain accurate records, and participate in training. Assist requesters as needed without conducting independent disclosures.

Board: Reviews of appeals (whenever relevant) and annual compliance reports.

7. Principle of Openness

Disclosure is the rule; confidentiality is the exception. REC Caucasus makes information publicly available to the maximum extent possible, with a strong preference for partial disclosure (e.g., redaction of sensitive portions) over full refusal wherever feasible and lawful. Information will only be withheld, if disclosure would cause harm to legitimate interests protected by this Policy.

The main areas of exclusion:

- International relations: Information that may harm REC Caucasus relations with other governments or institutions. This includes information received from or sent to third parties, under an expectation of confidentiality.
- Security and safety: Information that may pose a risk to the security or safety of any individual, including REC Caucasus employees (long-term, short-term, , Board members, contractors and beneficiaries.
- Personal information: Information relating to an identified or identifiable natural person, including but not limited to the following types of information:
 - i. Name, identification number, or contact details (when linked to private matters);
 - ii. Medical, financial, or employment records;
 - iii. Biometric data, or family details;
 - iv. Any data whose disclosure would violate laws or regulations or cause distress/harm to the individual;

Where possible, aggregation or anonymization should be used where possible to enable disclosure.

- Commercially sensitive information: Information that does harm to REC Caucasus or its partners or suppliers commercial interests.
- Information that is exempt from disclosure under other policies or regulations: This includes deliberative information.

8. Proactive Disclosure

To promote transparency, REC Caucasus will regularly publish project specific information, as required by donors, on its website (rec-caucasus.org) and other platforms (e.g., social media, annual reports). This includes:

- Project descriptions, updates, and outcomes.

- Environmental data from projects (e.g., assessments, monitoring results).
- Governance documents (e.g., charters, policies).
- Various publications created during the projects.
- Project-level state-of-the-environment summaries or inventories where applicable.
- Project-level Environmental and Social risk management documents, such as Environmental and Social Impact Assessments (ESIA), Environmental and Social Management Plans (ESMP), or other risk assessments.
- Project-level monitoring reports, including safeguards-related monitoring updates.
- Evaluations of programs or projects (mid-term and final).
- Project-level audits and financial summaries.
- Procurement-related information, including procurement plans, opportunities, selection criteria, tender results, contract awards, and vendor information.
- Project-specific stakeholder engagement summaries.

In addition to public disclosure, REC Caucasus commits to sharing relevant information with external entities providing oversight, such as funding entities (including the Adaptation Fund), evaluation mechanisms, or other regulatory bodies, as required by funding agreements or accreditation standards. This ensures compliance with funder expectations for transparency and accountability in the management of financed activities.

Steps:

- Managers of Programmes and Projects identify disclosable information quarterly or semi-annually.
- Transparency Focal Point reviews for accuracy and exceptions.
- Executive Director approves the information for publication (or, for routine non-sensitive items, the Transparency Focal Point may approve on behalf of the Executive Director).
- Use accessible formats (e.g., PDF, summaries in local languages: Georgian, Armenian, Azerbaijani, English).

9. Receiving Requests

All requests must be directed to the Transparency Focal Point via email (info@rec-caucasus.org), online form on the website, mail, phone, or in-person at headquarters or branch offices. Requests may be submitted anonymously; however, providing contact details is strongly encouraged to enable full responses, clarifications, and delivery of information. Anonymous requests will receive limited responses (e.g., public posting on the website or general acknowledgment without direct follow-up). If a request for information is received by other staff, the employee in question shall forward the request immediately to the Transparency Focal Point.

The Transparency Focal Point shall log the request in the Disclosure Register (including date, requester details if provided, description, and assigned ID) and shall forward the acknowledge receipt to the requesting party within 2 business days, providing the estimated response time. Where appropriate, the Transparency Focal Point shall communicate with the requesters if the request is unclear (e.g., suggest refinements). No justification for the original request shall ever be required.

10. Evaluation

Within five business days from the date a request is submitted, the Transparency Focal Point shall coordinate with other departments of REC Caucasus to assess whether the information is held by REC Caucasus.

If requested information is not held by REC Caucasus, the Transparency Focal Point shall inform the requester and, if possible, refer to another source (e.g., government agency). If requested information is held, the Transparency Focal Point shall determine if it qualifies as environmental or organizational information and shall check for exceptions (e.g., personal data, commercial confidentiality, intellectual property). If needed, the Transparency Focal Point shall consult with the legal advisor.

If the evaluation for the request of information shall establish that partial disclosure is possible, the Transparency Focal Point shall separate exempt from non-exempt parts.

The Transparency Focal Point shall coordinate with other relevant REC Caucasus employees to provide the information in requested format (e.g., electronic files such as PDF, Word, Excel, or email attachments; or physical paper copies) unless the request is manifestly unreasonable (due to excessive volume, cost, or technical infeasibility). Electronic format (such as PDF, Word, Excel electronic files, or email attachments) is the preferred default for efficiency, accessibility, and cost-effectiveness, particularly for large volumes of requested information.

11. Response

The Transparency Focal Point shall ensure that the requested information is provided as soon as possible, and no later than ten (10) business days from the date of receipt of the request.

If the request is complex or involves a large volume of information, the timeframe may be extended up to thirty (30) business days. In such cases, the Transparency Focal Point shall inform the requester within the initial ten (10) business days, providing the reasons for the extension.

Responses shall be accurate, complete, and provided in accessible formats. Where applicable, the Transparency Focal Point shall ensure that non-technical summaries are included for complex or technical data.

If the request is refused, either in whole or in part, the Transparency Focal Point shall provide the requester with a written explanation, citing the specific exceptions applied, and informing the requester of their right to appeal to the REC Caucasus Executive Director.

Information shall be provided free of charge when delivered electronically. For printed or copied materials, reasonable fees may apply to cover the printing costs. Fee waivers may be granted for requests in the public interest or from non-governmental organizations, community-based organizations or civil society groups.

All responses shall be logged in the Disclosure Register maintained by REC Caucasus.

12. Appeal Mechanism

Requesters dissatisfied with a denial of information, partial disclosure, or the adequacy of a response may submit an appeal. Appeals shall be submitted in writing (via email to grm@rec-caucasus.org, postal mail, or in-person) to the REC Caucasus Grievance Redress Mechanism (GRM) Focal Point within thirty (30) calendar days from the date of the initial response. Appeals must include the original request details, reasons for dissatisfaction, and any supporting evidence.

The GRM Focal Point shall handle the appeal in accordance with the REC Caucasus GRM Operating Procedures, treating it as a formal complaint alleging harm from non-compliance with transparency obligations. The process shall include:

- **Acknowledgment and Registration:** Acknowledge receipt within 2 business days and log the appeal in both the Disclosure Register and the Complaints Register.

- **Admissibility Assessment:** Within 10 business days, evaluate admissibility. Consult the Transparency Focal Point, relevant project/programme managers, Executive Director, and legal advisor as needed.
- **Formulation of Proposal:** If admissible, formulate a resolution proposal within 30 business days (extendable for complex cases with notice), including consultation with the requester and an action plan.
- **Decision and Implementation:** Issue a written decision with rationale.

If an appeal is upheld, Transparency Focal Point shall provide the information promptly (within 5 business days) in the requested format. If an appeal is denied, the Transparency Focal Point shall send a formal notification to the requester explaining the specific reasons for denying the disclosure of requested information.

If no agreement was reached with the requester, and the matter remains unresolved internally, the GRM focal point may elevate the matter to the REC Caucasus management (Executive Director) or further to the Board or external oversight per the GRM Operating Procedures. For transparency-related appeals involving activities financed by external funders, if the issue remains unresolved after internal escalation, REC Caucasus shall provide access to external oversight or accountability mechanisms as required by partnership agreements or funder policies.

This may include referral to the funder's independent review mechanisms, or other relevant external bodies to ensure impartial resolution of the matter.

All appeals, decisions, and escalations shall be recorded in the Complaints Register for internal tracking, annual reporting, and safeguards performance monitoring. Relevant notes regarding the appeals process will also be processed in the Disclosure Register (comments section). No retaliation shall occur against requesters, in line with GRM principles of impartiality, transparency, and freedom from reprisal.

13. Record-Keeping

REC Caucasus shall maintain a centralized Disclosure Register in the form of an electronic database. This register shall document all requests for information, responses provided, appeals submitted, and proactive disclosures made. All records shall be retained for a minimum period of three (3) years.

An annual report summarizing disclosure activities — including the number of requests received, response times, refusals issued and appeals processed — shall be submitted to the REC Caucasus Board and made publicly available on the REC Caucasus website.

14. Training and Awareness

All REC Caucasus staff shall be informed on this Policy and Standard Operating Procedure (SOP), the principles of the Aarhus Convention, and procedures for handling information requests. The Transparency Focal Point shall be responsible for organizing or delivering the annual training or instructions to all staff.

Public awareness of this Policy/SOP shall be promoted through the REC Caucasus website, outreach workshops, and communication in project activities.

Guidance materials shall be regularly updated based on findings from relevant compliance mechanisms, such as the Aarhus Compliance Committee, and emerging best practices.

15. Monitoring and Review

The Transparency Focal Point shall monitor institutional compliance with this corporate Policy and SOP on a quarterly basis.

The SOP shall be reviewed annually, or more frequently if required by legal or procedural changes. Revisions shall be proposed by the Transparency Focal Point and subject to approval by the Executive Director.

Feedback from stakeholders shall be incorporated into the review process to ensure alignment with international standards, including the UNECE Aarhus Convention Implementation Guide.

16. References

- Aarhus Convention (1998) and Implementation Guide (2014).
- OSCE Strategy for Implementing the Aarhus Convention.
- REC Caucasus Charter and related policies.



This document was reviewed, adopted, and approved on [date] by the REC Caucasus Executive Body (Collegial Trio) in accordance with the organization's internal governance procedures, and shall enter into force as of the date of approval.

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