

Disclosure Policy

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DISCLOSURE POLICY OF SMALL INDUSTRIES DEVELOPMENT BANK OF INDIA (SIDBI)

Right to Information Act 2005 (RTI), is not only about the right to know but also about the right to questions which, in turn, increases the transparency and accountability and also strengthen the democracy. SIDBI considers disclosure of information under RTI as a very important responsibility and has a positive bias towards disclosure and increased transparency. In fact, SIDBI use RTI as a tool of governance. SIDBI has been proactively disseminating information, not only in compliance with the requirements of the Act, but also with the objective of achieving better corporate governance through greater transparency and accountability. It may, however, be stated that SIDBI being the principal financial institution for the country for MSME, receives and holds a lot of sensitive information, the disclosure of which may not, at all times, be in the public interest. Similarly, SIDBI is also privy to personal information pertaining to its employees as well as other stake holders such as customers, borrowers consultants, advisors etc., and disclosure of such personal information would not only compromise the privacy of the concerned individuals, but also, in some extreme cases may endanger their life / security. Such information is considered as exempt from disclosure under the provisions of RTI Act. A list of such information which cannot be disclosed either wholly or partially is furnished

below. The list is only indicative and not exhaustive, which may be revised periodically.

1. Human Resource Vertical

Sl No.	Information that cannot be disclosed	Enabling provision under RTI Act, 2005
1)	Transfer request letters / representations / records and connected notings and correspondence received from officer.	Section 8(1)(j)
2)	Third party personal information appearing in office notes.	Section 8(1)(j)
3)	PAR marks of third party	Section 8(1)(e) and (j)
4)	Examination and interview marks of unsuccessful candidates (in Bank's internal exam / interview) other than that of information seeker.	Section 8(1)(j)
5)	Details of employee's service details / representations of third parties and connected notings & correspondence.	Section 8(1)(j)
6)	Personal details of leave application such as nature of sickness etc. of the employee sought by third party.	Section 8(1)(j) and (e)
7)	Details of nominations made by the employee, but sought by third party,	Section 8(1)(j) and (e)
8)	List of employees of doubtful integrity.	Section 8(1)(e), (h) & (j)
9)	Agreed list of employees prepared in consultation with the Central Bureau of Investigation.	
10)	Vigilance audit report	Section 8(1)(a)
11)	Information / papers pertaining to departmental enquiries sought by third parties.	Section 8(1)(j)
12)	Performance Appraisal Report (PAR) and service file of the employees	Section 8(1)(e) and (j)
13)	Residential address of employees	Section 8(1)(j)
14)	Information relating to sexual harassment cases, such as the complaint, the identity and addresses of the aggrieved person, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee or the Local Committee as the case may be, and the action taken thereon, sought by third party.	Section 8(1)(j) of the RTI Act and Section 16 of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
15)	Personal details of the employee (other than self) such as – a) Various deduction from salary including quantum b) Bank Account details	Section 8(1)(e) & (j)

	<ul style="list-style-type: none"> c) Amounts of loans and advances availed d) Information relating to movable / immovable properties, e) The nature of illness f) Information relating to LFC except the amount reimbursed, g) Names of dependents for claiming various facilities. 	
16)	Details of Superannuation benefits like Provident Fund, Gratuity, Encashment of leave, commuted value of pension paid to individuals (except to legal heirs in case of death). Also, information on compassionate package paid on behalf of individuals.	Section 8(1)(e) & (j)
17)	Nominee details of the employees towards Provident Fund, Gratuity, Group Savings Linked Insurance (GSLI) etc. to third parties.	Section 8(1)(e) & (j)

2. Refinance – SFCs, Banks & NBFC Vertical

Sl No.	Information that cannot be disclosed	Enabling provision under RTI Act
1)	Names of clients and quantum of refinance / credit limit sanctioned by SIDBI to any of the eligible financial institutions by way of refinance assistance.	Section 8(1)(d)(e) as this is in the nature of a lender – borrower relationship.
2)	Names and address of clients and the loans sanctioned to them, outstanding status of account, status of the financial position of the client etc. in respect of the co-finance proposals sanctioned by SIDBI.	Section 8(1)(d)(e)(g)
3)	Credit risk exposure estimated by SIDBI in respect of its clients	Section 8(1)(d)(e)
4)	Details of default forecasting exercise carried out by SIDBI in respect of its clients	Section 8(1)(d)(e)
5)	Details of client wise loans converted / rescheduled / rephrased and client wise outstanding there against	Section 8(1)(d)(e)
6)	Copy of agreement signed by SIDBI with client banks / institutions/ State Govt.	Section 8(1)(e)
7)	Internal notings including agenda papers meant for Management Committee / Board meetings of SIDBI	Section 8(1)(d) – information will be furnished to the extent possible after exercising the severability clause under Section 10 of the Act.

8)	Inspection reports of SFCs as also scrutiny note / study report.	Section 8(1)(a) & (d)
9)	Any information derived from these reports or contained in such reports and supervisory action recommended.	-do-
10)	Supervisory rating of SFCs	-do-
11)	Any information obtained from / submitted by SFCs and held by us in a fiduciary capacity	Section 8(1)(e)
12)	Inspection manuals, confidential instructions to inspecting officers, secret internal guidelines and communications.	Section 8(1)(d)

3. Credit Vertical including Equity & Risk Capital Vertical and Receivable Finance Scheme vertical :

SI No.	Information that cannot be disclosed	Enabling provision under RTI Act
1)	Third party personal information about individual borrowers that is available with the banks / received from the banks in a fiduciary capacity.	Section 8(1)(e) and (j)
2)	Correspondence with borrowers, if asked by third party.	Section 8(1)(e)
3)	Such information furnished by borrower entities that have not been disclosed to public by them in Annual Reports, etc.	Section 8(1)(e) and (j)
4)	Opinions furnished by SIDBI Legal Vertical or any other external agency which will aid in taking a decision about the project	Section 8(1)(e)
5)	Copy of the loan agreement and other agreements signed by the borrowers / agencies / eligible institutions for obtaining assistance from SIDBI under various BID relative activities	Section 8(1)(e)
6)	Information provided to Government / Parliament in connection with Parliament questions before it is laid before the parliament	Section 8(1)(c)
7)	Information received from institutions of foreign country origin for collaboration with SIDBI.	Section 8(1)(f)
8)	Documents related to commercial confidence, trade secrets of the proposals that have been received from third party unless competent authority is satisfied that larger public interest warrants disclosure of such information.	Section 8(1)(d)

9)	Appraisal note, investment note and project report containing technical, financial and legal statement / parameters in respect of the borrowers	Section 8(1)(d) and (e)
10)	Agreement signed with external and such other agencies which would adversely affect the interest of both parties.	Section 8(1)(a) and (f)
11)	Agenda and Minutes cum PSR of CCIC, IC-SAS, VCIC.	Section 8(1)(d) & (e)
12)	CIBIL personal / consumer / commercial report generated on the borrower or the borrowing company.	Section 8(1)(e)
13)	KYC documents received from the borrower	Section 8(1)(e)
14)	Copy of agreement signed by SIDBI with banks / institutions / external.	Section 8(1)(d)
15)	Internal notings including agenda papers meant for Management Committee / Board meetings of SIDBI	Section 8(1)(d) Information will be furnished to the extent possible after exercising the severability clause under section 10 of the Act.
16)	Any information derived from these reports or contained in such report and supervisory action recommended.	
17)	Inspection manuals, confidential instructions to inspecting officers, confidential internal guidelines and communications.	Section 8(1)(d)
18)	Discount rate / interest rate sanctioned to a customer.	Section 8(1)(d)

4. SFMC Vertical and P&D Vertical

Sl. No.	Information that cannot be disclosed	Enabling provision under RTI Act
1	Details of proposals for assistance from MFIs/NGOs/institutes/agencies etc., being in the nature of intellectual property right disclosure of which will harm competitive nature of the third party.	Section 8(1) (d)
2	Information regarding details of credit facilities from other institutions in respect of SIDBI's customers and also similar or any other information in respect of other stakeholders like SHGs, MFIs, NGOs, etc. held by SIDBI in fiduciary capacity.	Section 8(1) (e) (j)
3	Annual reports, financial details, registration details etc., of a third party obtained by SIDBI in connection with consideration of extending financial assistance.	Section 11 of the RTI Act, 2005. Also exempt under Section 8(1) (e).
4	Specific terms and conditions pertaining to sanction of financial assistance either by grant or	Section 8(1) (d)

	loan or both including copy of agreements sanctioned to a particular MFI/ agency etc. except to the concerned person / firm / agency.	
5	Credit Risk Exposure estimated by SIDBI in respect of its clients	Section 8(1) (d) (e)
6	Correspondence with third party borrowers	Section 8(1)(e)
7	Information provided to Government / Parliament in connection with Parliament questions before it is laid before the parliament	Section 8(1)(c)
8	Information received from institutions of foreign country origin for collaboration with SIDBI.	Section 8(1)(f)
9	Appraisal note, requests and proposals containing technical, financial and legal statement / parameters in respect of the borrowers.	Section 8(1)(d) and (e)
10	Agreement signed with external and such other agencies which in the opinion of Competent authority would adversely affect the interest of both parties.	Section 8(1)(a) and (f)

5. Economic Planning & Research Vertical

SI No.	Information that cannot be disclosed	Enabling provision under RTI Act
1)	<p>Personal as well as project / proposal specific information about the agency seeking financial assistance under Research & Development Fund / all other information obtained from the institution cannot be disclosed.</p> <p>(Name & address of agency sanctioned grants may be disclosed)</p> <p>Reason for sanction and / or rejection of proposal seeking financial assistance under R&D Fund, if any.</p>	<p>This information relates to Intellectual Property & therefore exempt under Section 9, and Section 8(1)(d).</p> <p>May be disclosed to the extent it is not exempt under Section 8 or any other clauses of the Act. (Can be disclosed only to the applicant).</p>

6. IT Vertical and formulation of policy for digital initiatives :

SI No.	Information that cannot be disclosed	Enabling provision under RTI Act
1)	Details of software developed, implemented and used in the Bank, which is proprietary to the Bank	Exempt under section 8(1)(d)
2)	Location of systems, distribution of systems architecture of the applications / networks and	-do-

	physical security of computer financial system / networks.	
3)	Backup arrangements at the various data centres Business Continuity Plan	-do-
4)	Disaster Recovery Management of the Bank for running the various applications.	-do-
5)	Security Financial and non-financial classified transactions performed on a computer / computer systems / networks in the data centres.	-do-
6)	Encrypted Message / data, transactions and system of encryption relating to financial and non-financial transactions flowing in and out of the Bank's systems.	-do-
7)	Audit trails / computer logs and access control systems and data.	-do-

7. Resource, Treasury and Fund Management Vertical

Sl No.	Information that cannot be disclosed	Enabling provision under RTI Act
1)	Call / Term Money – Transaction – wise data, except to the extent published	Section 8 (1) (d) & (e)
2)	Commercial Paper – Data pertaining to Primary issuances, except to the extent published	-do-
3)	Certificate of deposit – Data pertaining to primary issuances, except to the extent published	-do-
4)	Liquidity Adjustment Facility (LAF) Transaction-wise data, except to the extent published	-do-
5)	Government securities and Treasury bills transaction wise data, except to the extent published.	-do-
6)	Investment by Foreign Institutional Investors (FII) in G-Sec and Corporate bonds – Account-wise data from custodial banks.	-do-
7)	Interest rate swaps (IRS) – Entity-wise data received from Clearing Corporation of India Limited (CCIL) and client level data received from banks	Section 8 (1) (d) & (e)
8)	Currency futures Limited entity-wise data received from SEBI	-do-
9)	Copy of agreement signed by SIDBI with investors / institutions / Govt / funding agencies / ISDA.	Section 8(1)(e)
10)	Internal notings including agenda papers meant for Investment Committee / ALCO / Board meetings of SIDBI	Section 8(1)(d) – information will be furnished to the

		extent possible after exercising the severability clause under section 10 of the Act.
11)	Policy documents and internal guidelines and communications.	Section 8(1)(d)
12)	Third party personal information about individual investors that is available with the banks / received from the investors in a fiduciary capacity.	Section 8(1)(e) and (j)
13)	Correspondence with investors / borrowers if asked by third party.	Section 8(1)(e)
14)	Such information furnished by investors / lenders that have not been disclosed to public by them in the Annual Reports etc.	Section 8(1)(e) and (j)
15)	ALM Policy, investment policy, guidelines on derivatives, forex manual	Section 8(1)(d)
16)	Information provided to Government / Parliament in connection with Parliament question before it is laid before the parliament	Section 8(1)(c)
17)	Information received from institutions of foreign country origin for collaboration with SIDBI.	Section 8(1)(f)
18)	Documents related to commercial confidence, trade secrets of the proposals that have been received from third party unless competent authority is satisfied that larger public interest warrants disclosure of such information.	Section 8(1)(d)
19)	Agreement signed with external and such other agencies which would adversely affect the interest of both parties.	Section 8(1)(a) and (f)
20)	Information relating to bidders – i) Information relating to bids till a decision is taken. ii) Information relating to rejected bids iii) Personal information relating to bidders	Section 8(1)(d) and (e) and (j)
21)	Any information related to the services / works / products treated as confidential by bidders / service provider / contractor in his own business interest.	Section 8(1)(d)

8. Risk Management Vertical

Sl No.	Information that cannot be disclosed	Enabling provision under RTI Act
1	Fixing of Credit Exposure to Bank / FIs	Section 8(1)(e)
2	Risk parameter under various rating models	Section 8(1)(d)

3	Estimates of probability of default	Section 8(1)(d)
4	Loss given default estimates	Section 8(1)(d) and (e)

9. Stress Assets and NPA Management Vertical

SI No.	Information that cannot be disclosed	Enabling provision under RTI Act
1	Client wise information of NPAs and Restructured advances cannot be disclosed except that is required to be published as per the regulatory norms.	Section 8(1)(d)
2	Loan Recovery Policy	Section 8(1)(d)
3	One Time Settlement Policy	Section 8(1)(d)
4	Sale of Assets Policy	Section 8(1)(d)
5	OTS / Restructuring Memorandum placed before various sanctioning committee	Section 8(1)(d) & (e)

10. Administration and Premises Vertical

SI No.	Information that cannot be disclosed	Enabling provision under RTI Act
1)	Information relating to bidders (i) Information relating to bids till a decision is taken (ii) Information relating to rejected bids (iii) Personal information relating to bidders	Section 8(1) (d) & (e) & (j)
2)	Any information related to the services / work / products treated as confidential by bidders/ service provider / contractor in his own business interest	Section 8 (1) (d)
3)	Committee reports such as Premises Committee report, Enquiry report, CVC Report till action is complete	Section 8 (1) (h)
4)	Building plans / floor plans and other infrastructure systems and arrangements sensitive from security point of view.	Section 8 (1) (a) and Section 9
5)	Correspondence entered with banks and other entities in fiduciary capacity.	Section 8(1)(a) and (e)
6)	Any information of data received by the Department in Fiduciary capacity	Section 8(1) (e)
7)	Structural plans / infrastructure systems / building plans / floor plans and arrangements sensitive from security point of view in the case of infrastructure projects.	Section 8(1) (a) and Section 9

11. Legal Vertical

SI No.	Information that cannot be disclosed	Enabling provision under RTI Act
1)	Legal opinion furnished by Legal Department and any other external agency and notes and papers, briefs received from various HO Verticals and ROs.	Notings / Legal opinions can be disclosed except those which contain information exempted from disclosure under Section 8 of RTI Act, 2005.
2)	Pleading, affidavits Memorandum and other papers filed before the Judicial / Quasi – judicial authorities and draft prepared in that regard and correspondence with Bank's advocate / Senior counsels.	Section 8 (1) (e)
3)	Correspondence with Govt or Govt agencies or Banks or statutory agencies or regulated entities with respect to policy or proposed decision or drafting of a bill / regulation / rule, etc. in connection with an proposed action.	Section 8 (1) (e)

12. Audit Vertical

SI No.	Information that cannot be disclosed	Enabling provision under RTI Act
1	All type of Audit reports such as Operational, Concurrent, Credit, Special, Security, Information System & Management Audit of BOs / ROs / HO Verticals / Subsidiaries / foreign agencies & any information derived from these reports	Section 8(1) (a) & (d) Information will be furnished to the extent possible after exercising the severability clause under section 10 of the Act.
2	Compliance on Audit reports	
3	Memorandums Minutes / Proceedings of ACB	
4	Time to time special study reports by various consultants / committees	
5	RFP related internal notes	

13. Fraud Management Cell :

SI No.	Information that cannot be disclosed	Enabling provision under RTI Act
1	Individual details of Frauds – Names of fraudulent borrowers, promoters, modus	Section 8(1)(d)

	operandi (details as given in FMR-1) current status.	Information will be furnished to the extent possible after exercising the severability clause under section 10 of the Act.
2	Statistics of frauds with SIDBI	
3	Internal Policy of frauds	
4	Investigation / special audit reports in respect of fraud cases	
5	Reports / Returns / Periodic returns submitted to RBI in respect of fraud cases	

14. Central Vigilance Vertical

Sl No.	Information that cannot be disclosed	Enabling provision under RTI Act
1)	Third party personal information	Section 8(1)(j)
2)	List of employees of doubtful integrity	Section 8(1)(e) (h) & (j)
3)	Agreed list of employees formulated in consultation with the Central Bureau of Investigation	Section 8(1)(j)
4)	Complaints which includes the name of the complainant, nature of complaint and the individual / authority against which complaint has been made	Section 8(1)(e), (g), (h) & (j)
5)	Investigations pending final decision, names and other details of the investigating officials.	Section 8(1)(g), (h) & (j)
6)	Information / papers pertaining to departmental enquiries sought by third parties where proceedings are pending before Disciplinary Authorities / Appellate Authority or any judicial / quasi-judicial authorities	Section 8(1) (h)
7)	Movement / tour details and TA bills, of the officers / officials working in the vigilance department	Section 8(1) (g)

15. Credit Advisory and Loan Syndication Vertical :

Sr. No.	Information that cannot be disclosed	Enabling provision under RTI Act, 2005
1)	Recruitment of Knowledge Partners (KP) – Marks obtained by candidates in Bank's internal interview other than that of information seeker.	Section 8(1)(j)
2)	Personal information of KPs. (Address, bank account details, nature of illness etc.) to third party.	Section 8(1)(e)(j)

3)	Information sought by a third party on complaints which includes the name of the complainant, nature of complaint and the individual / authority against which complaint has been made to SIDBI.	Section 8(1)(e), (g),(h) & (j)
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16. Board Division :

Keeping in view the settled legal position, the decision to disclose the documents in the custody of the SIDBI, relating to the meetings of the Board, or its Committees would be taken having regard to the contents in those documents and the exemptions available under the RTI Act, 2005.

The details of composition of Board of Directors are published on the Bank's website under the heading about Board of Directors. The proceedings and minutes of the meetings will be furnished to the information seeker to the extent possible after severing sensitive information exempt under the RTI Act i.e. in view of exemptions as per Section 8 and exercising the severability clause as per Section 10 of RTI Act, 2005.

17. Rajbhasha Vertical :

The information will be furnished to information seeker to the extent possible after severing sensitive information exempt under the RTI Act i.e. in view of exemptions as per Section 8 and exercising the severability clause as per Section 10 of RTI Act, 2005.

18. International Co-operation, Energy Efficiency Cell, Consultancy, Cluster Development, Central Co-ordination Vertical :

The information will be furnished to information seeker to the extent possible after severing sensitive information exempt under the RTI Act i.e. in view of exemptions as per Section 8 and exercising the severability clause as per Section 10 of RTI Act, 2005.

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