

DOCUMENT ADMINISTRATION

VERSION NUMBER	APPROVAL PROCESS	DATE
1.0	Prepared by: Executive Office	November 2010
	Reviewed by: <ul style="list-style-type: none"> • MD, Policy and Performance • MD, Programme Delivery • MD, Legal and Governance • MD, Finance and Operations • Internal Auditor • Interim CEO • Executive Team (sub-group on Corporate issues) 	
	Approved by: Executive Team	1 March 2012
	Effective from:	1 March 2012
2.0	Prepared by: Legal and APP	November 2014
	Reviewed by: Executive Team	20 November 2014
	Approved by: Deputy CEO	5 March 2015
3.0	Prepared by: Legal	May 2025
	Reviewed by: <ul style="list-style-type: none"> • Knowledge Management & Technology Solutions • Communications • Secretariat Management Group sub-group of Senior Leadership Team 	10 July 2025
	Approved by: CEO	16 January 2026

Effective from:	1 February 2026
Next review:	February 2029

1. Purpose, Scope and Rationale

- 1.1. The purpose of this policy is to enhance Gavi’s accountability towards Alliance partners and stakeholders, as well as the general public who may be interested in Gavi’s work, by providing access to the information that will enable Gavi partners and stakeholders to understand its governance, strategies, policies and activities.
- 1.2. This policy is based on the premise that the effectiveness of Gavi’s programmes will be strengthened by public access to information, and that broad availability to the public of information about Gavi’s activities will increase understanding and support of Gavi’s mission.
- 1.3. This policy sets out the categories of documents that shall be made publicly available to external audiences through the Gavi website and other appropriate means of communication.
- 1.4. This policy applies to all Gavi employees (including staff members on fixed and indefinite staff contracts) as well as consultants.
- 1.5. This policy should be read in conjunction with the following documents:
 - 1.5.1. Information and Data Classification Policy
 - 1.5.2. Data Protection and Privacy Policy
 - 1.5.3. Information Security Policy

2. Principles

- 2.1. Transparency: Gavi recognises that there is a positive correlation between a high level of transparency through information sharing and public understanding of Gavi supported activities. The general policy of Gavi is to operate in a transparent and accountable manner, consistent with its Statutes and the Board and Board Committee Operating Procedures.
- 2.2. Presumption in favour of disclosure: Gavi’s Access to Information Policy is guided by openness, with the underlying presumption that any information regarding Gavi programmes and operations is available to the public, in the absence of a legitimate reason for withholding disclosure in line with the exceptions in Section 4.
- 2.3. Timely access to information: In order to facilitate public access to information and transparency around Gavi’s operations, information concerning Gavi’s decisions and operational activities will be made available to the public in a timely and easy to access manner.

2.4. Appeals process: Where requests for information are not granted, there is a clear and timebound process for reviewing decisions made by Gavi and responding to requestors of information.

3. Disclosure categories

Documents to be posted on Gavi's website

3.1. Subject to the exceptions set out in Section 4, the following information will be made publicly available, in particular through posting on Gavi's website. To this end, each of the relevant Gavi Secretariat teams are responsible for submitting documents to Gavi's Communications team in a timely manner (whether annually or as and when new or updated documents become available):

- A list of all current Board members and Alternates, and members of each Board Committee.
- For Board meetings, minutes of each meeting following their approval by the Board, accompanied by the full text of approved decisions and accompanying Board reports and presentations.
- Minutes of Board Committee meetings following their approval by the applicable Committee and after the next Board meeting, including the full text of decisions approved by that Committee.
- Calendar of upcoming Board and Committee meetings.
- Statutory documents (Board and Board Committee Operating Procedures), Committee Charters and Terms of Reference, and Guiding Principles on Gender Balance for Board and Committee Nominations (English and French).
- Other Board-approved corporate policies (English and French).
- The Gavi Alliance Statutes and By-laws.
- The Gavi Alliance Annual Progress Reports.
- The Gavi Alliance Strategy, Business Plan and its Approved Budget.
- Gavi country financial commitments and disbursements.
- Country applications and joint appraisals for approved country programmes.
- Programmatic and Finance policies.
- Secretariat policies.
- Gavi evaluations once approved by the Board.
- Annual Financial Report (including consolidated financial statements of Gavi and IFFIm).
- Internal and Country Audit Reports.

- Country Investigation Reports.
- Tax returns that Gavi files may be retrieved from the websites of the relevant tax authorities such as www.guidestar.org for the filing to the United States Internal Revenue Service (IRS) and www.charity-commission.gov.uk for the submission to the Charity Commission of England and Wales.
- Such other documents that Gavi may decide to make publicly available.

Documents to be disclosed on request

3.2. Subject to the exceptions set out in Section 4 below, and any restrictions imposed by applicable law, all Gavi documents held by the Secretariat shall be available for public disclosure within 30 calendar days of a request, provided the costs of making such documents available are reasonable.

4. Exceptions

4.1. Gavi is committed to ensuring that an open and transparent disclosure system is put in place. However, there may in some instances be legal, operational and practical considerations that are necessary to preserve the organisation's interests, as well as those of its staff and its various partners, which may prevent Gavi from achieving full disclosure. Information under the following categories will by default be considered confidential and not be published, unless Gavi determines that it is in the public interest to do so:

- 4.1.1. Information received from or sent to third parties, under an expectation of confidentiality;
- 4.1.2. Information whose disclosure is likely to endanger the safety or security of any individual, violates his or her rights, or invades his or her privacy;
- 4.1.3. Information whose disclosure is likely to endanger the proper conduct of any Gavi operation or activity;
- 4.1.4. Information covered by legal privilege or pertaining to legal advice;
- 4.1.5. Information related to Gavi's internal investigations;
- 4.1.6. Information related to enquiries, investigations and follow up on indications into possible misuse of Gavi funds that does not form part of any published investigation report;
- 4.1.7. Information on Gavi's internal deliberations and communications;
- 4.1.8. Commercial information that would harm either the financial interest of Gavi or those of third parties involved;
- 4.1.9. Commercially sensitive information and restrictions imposed by applicable law or contract;
- 4.1.10. Information pertaining to personal employment records;
- 4.1.11. Information pertaining to whistleblowers; and

4.1.12. Any information related to Gavi's internal systems, processes, or infrastructure, the disclosure of which is likely to be used by threat actors or other third parties to conduct reconnaissance and exploit vulnerabilities in order to cause material financial, reputational, operational, regulatory or security-related harm to Gavi.

4.2 Where it is determined by the General Counsel that the risks posed by disclosure of the information above can be managed through redaction or a delay in publication, then a document containing such information may still be published on Gavi's website with the required redactions and in an acceptable form.

4.3 Harm test and public interest override: In exceptional circumstances, Gavi may decide to disclose information deemed confidential (as listed above) if it determines that the overall benefits and public interest of such disclosure outweigh the likely harm to the interest(s) protected by the exception(s). This may include situations in which Gavi determines that the disclosure of certain confidential information would avert imminent and serious harm to public health or safety. Such disclosure by Gavi would be on the most restricted basis necessary to achieve the purpose of the disclosure.

5. Consideration of requests for information

5.1. Any request received by Gavi under this policy will be considered by an internal working group, comprising a relevant subject matter expert and representatives from the Legal, Communications, and Ethics, Risk and Compliance teams (and other teams as appropriate). Decisions on whether to disclose information will be taken by the relevant subject matter expert, following consultation with other members of the internal working group.

6. Independent appeals process

6.1. If a requester of information does not obtain the desired information from the Gavi website or from contacting Secretariat staff, or if the information requested is denied for reasons that appear inconsistent with this policy, the requester may have their request considered by Gavi's appeals panel (each panel to be constituted of three senior members of staff, including Gavi's Chief Audit and Investigations Officer and General Counsel).

6.2. Should a requestor of information disagree with the decision of the appeals panel, then they may request to make a further appeal to an independent appeals panel. The independent appeals panel will be constituted of three external experts on access to information, to be appointed by Gavi's General Counsel. Decisions of the independent appeals panel shall be final.

6.3. Gavi will consider all requests with legitimate concerns from any organisation or individual. The appeals panel (or independent appeals panel, as appropriate) will acknowledge requests within 30 calendar days of their receipt and provide notice of their decision following an appeal within 15 calendar days of making the decision.

6.4. Requests should be directed to: Access to information appeals panel, p/o General Counsel, Gavi, the Vaccine Alliance
Address: 2 Chemin du Pommier 40, 1218 Geneva, Switzerland
Email: accesstoinformation@gavi.org

7. Effective Date and Review

7.1. This amended Policy is effective from 1 February 2026.

7.2. The Policy will be reviewed and updated every three years.