International Finance Corporation Access to Information Policy Advisor

Decision on Appeal for Request IFCH-876017449

(Decision Dated September 21, 2025)

$Summary^1$

Appeal Date: August 7, 2025

Information Request: The Freshfields US LLP Conclusions & Recommendations Report regarding its review of the Compliance Advisor Ombudsman's investigation of the International Finance Corporation investment in Bridge International Academies (the "Report").

Decision:

The Board of Directors, after careful review of the Access to Information Policy, has concluded that the Report is exempt from disclosure under multiple exceptions set forth in Paragraph 11 of the AIP, including that the Report:

- 1) Is protected by the attorney-client privilege, having been prepared by outside counsel for the purpose of providing legal advice and maintained as confidential (Paragraph 11(e));
- 2) Qualifies as Board-deliberative information or material (Paragraph 11(i)); and
- 3) Contains commercially sensitive and confidential information (Paragraph 11(a)).

The Board has the final authority over the disclosure of the Report. Accordingly, the Board's decision stands and is not subject to further review.

¹ The text has been reformatted for purposes of publication, and the name of the information requester has been redacted in line with the World Bank Group (WBG) Personal Data Privacy Policy. All other content remains the same.