Section II: Actions Taken in Relation to a Specific Application Before Credit, Cover or Other Support Has Been Approved

Question 9:

If, **before** credit, cover or other support has been approved, you become aware that an exporter and, where appropriate, applicant (or anyone acting on their behalf in connection with the transaction) **are listed on any of debarment lists that you verify**, what action(s) are taken?				Elaboration for "other" answers and/or any additional comments/clarifications:
Australia	Enhanced due diligence is undertaken	X	always	The underwriter reports the matter, including the outcome of the enhanced due diligence, to EFIC's Executive team who will determine, on a case by case basis, the necessary action to be taken in relation to the Exporter and where appropriate, the applicant, and the proposed application. The action may include refusing to provide the credit.
	Other	X	always	
Austria	Enhanced due diligence is undertaken	X	always	
	Other			
Belgium	Enhanced due diligence is undertaken	X	always	
	Other			
Canada	Enhanced due diligence is undertaken	X	always	
	Other			
Czech Republic (EGAP)	Enhanced due diligence is undertaken	X	always	
	Other			
Czech Republic (CEB)	Enhanced due diligence is undertaken	X	always	
	Other			
Denmark	Enhanced due diligence is undertaken	X	always	No experience to date.
	Other			
Finland	Enhanced due diligence is undertaken	X	always	
	Other			
France	Enhanced due diligence is undertaken	X	always	
	Other			
Germany	Enhanced due diligence is undertaken	X	always	
	Other			
Greece	Enhanced due diligence is undertaken	X	always	ECIO may refuse to provide cover.
	Other	X	always	
Hungary (MEHIB)	Enhanced due diligence is undertaken	X	always	
	Other			
Hungary (Eximbank)	Enhanced due diligence is undertaken	X	always	
	Other			
Italy	Enhanced due diligence is undertaken	X	always	
	Other			
Japan (JBIC)	Enhanced due diligence is undertaken	X	always	
	Other			
Japan (NEXI)	Enhanced due diligence is undertaken	X	always	
	Other			
Korea (Eximbank)	Enhanced due diligence is undertaken	X	always	
	Other			
Korea (KEIC)	Enhanced due diligence is undertaken	X	always	
	Other			
Luxembourg	Enhanced due diligence is undertaken	X	always	
	Other			
Mexico	Enhanced due diligence is undertaken			
	Other			

Section II: Actions Taken in Relation to a Specific Application Before Credit, Cover or Other Support Has Been Approved

Question 9:

If, **before** credit, cover or other support has been approved, you become aware that an exporter and, where appropriate, applicant (or anyone acting on their behalf in connection with the transaction) **are listed on any of debarment lists that you verify**, what action(s) are taken?				Elaboration for "other" answers and/or any additional comments/clarifications:
Netherlands	Enhanced due diligence is undertaken	X	always	
	Other			
New Zealand	Enhanced due diligence is undertaken	X	always	
	Other			
Norway	Enhanced due diligence is undertaken	X	always	GIEK has no experience in respect of Question 9.
	Other			
Poland	Enhanced due diligence is undertaken	X	always	
	Other			
Portugal	Enhanced due diligence is undertaken	X	always	
	Other			
Slovak Republic	Enhanced due diligence is undertaken	X	always	No experience. In case that such situation occurs, enhanced due diligence will be undertaken.
	Other	X	(not specified)	
Spain	Enhanced due diligence is undertaken	X	always	
	Other			
Sweden	Enhanced due diligence is undertaken	X	always	
	Other			
Switzerland	Enhanced due diligence is undertaken	X	always	
	Other			
Turkey	Enhanced due diligence is undertaken	X	always	
	Other			
United Kingdom	Enhanced due diligence is undertaken	X	always	
	Other			
United States (EXIM)	Enhanced due diligence is undertaken	X	always	
	Other			
United States (USDA)	Enhanced due diligence is undertaken	X	always	
	Other			

Section II: Actions Taken in Relation to a Specific Application Before Credit, Cover or Other Support Has Been Approved

Question 9 (continued):

If enhanced due diligence is undertaken:	a) Does the enhanced due diligence process include, inter alia, verification that the exporter/ applicant has in place appropriate management control systems that combat bribery?	b) Does the enhanced due diligence process include, inter alia, verification that the exporter/applicant has taken appropriate internal corrective and preventative measures after having been debarred?	Elaboration for "other" answers and/or any additional comments/clarifications:
Australia	Yes, always	Yes, always	
Austria	Yes, always	Yes, always	
Belgium	Yes, always	Yes, always	
Canada	Yes, always	Yes, always	
Czech Republic (EGAP)	Yes, always	Yes, always	
Czech Republic (CEB)	Yes, always	Yes, always	
Denmark	Yes, always	Yes, always	
Finland	Yes, always	Yes, always	
France	Yes, sometimes	Yes, sometimes	
Germany	Yes, always	Yes, always	
Greece	No	Yes, always	
Hungary (MEHIB)	Yes, always	Yes, always	
Hungary (Eximbank)	Yes, always	Yes, always	
Italy	Yes, always	Yes, always	
Japan (JBIC)	Yes, always	Yes, always	
Japan (NEXI)	Yes, always	Yes, always	
Korea (Eximbank)	Yes, always	Yes, always	
Korea (KEIC)	Yes, always	Yes, always	
Luxembourg	Yes, always	Yes, always	
Mexico			
Netherlands	Yes, always	Yes, always	
New Zealand	Yes, always	Yes, always	
Norway	Yes, always	Yes, always	GIEK has no experience in respect of Question 9.
Poland	Yes, always	Yes, always	
Portugal	Yes, always	Yes, always	
Slovak Republic	Yes, always	Yes, always	
Spain	Yes, always	Yes, always	
Sweden	Yes, always	Yes, always	
Switzerland	Yes, always	Yes, always	
Turkey	Yes, always	Yes, always	
United Kingdom	Yes, always	Yes, always	
United States (EXIM)	Yes, always	Yes, always	
United States (USDA)	Yes, always	Yes, always	

Section II: Actions Taken in Relation to a Specific Application Before Credit, Cover or Other Support Has Been Approved

Question 9 (continued):

If enhanced due diligence is undertaken (continued):	c) How is the application treated?			Elaboration for "other" answers and/or any additional comments/clarifications:
Australia	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Austria	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Belgium	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	See disclosure procedure under Question 8
	No fixed policy.			
	Other			
Canada	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Czech Republic (EGAP)	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Czech Republic (CEB)	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Denmark	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Finland	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
France	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	Vérification approfondie des informations, informations complémentaires demandées sur l'intervention éventuelle d'agents. Les informations recueillies sont transmises à un Comité qui statuera sur la suite à donner.
	No fixed policy.			
	Other			
Germany	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Greece	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			

Section II: Actions Taken in Relation to a Specific Application Before Credit, Cover or Other Support Has Been Approved

Question 9 (continued):

If enhanced due diligence is undertaken (continued):	c) How is the application treated?			Elaboration for "other" answers and/or any additional comments/clarifications:
Hungary (MEHIB)	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Hungary (Eximbank)	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Italy	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Japan (JBIC)	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Japan (NEXI)	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Korea (Eximbank)	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Korea (KEIC)	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Luxembourg	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Mexico	The approval of the application is suspended pending the outcome of the enhanced due diligence process.			
	No fixed policy.			
	Other			
Netherlands	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
New Zealand	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	Additional actions will be determined by the information received from the exporter and NZECO's assessment of the measures taken by the exporter/applicant since debarment. NZECO may refuse to provide the guarantee/insurance if information is not satisfactory.
	No fixed policy.			
	Other			

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Question 9 (continued):

If enhanced due diligence is undertaken (continued):	c) How is the application treated?			Elaboration for "other" answers and/or any additional comments/clarifications:
Norway	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	GIEK has no experience in respect of Question 9.
	No fixed policy.			
	Other			
Poland	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Portugal	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Slovak Republic	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	Until now no experience. In case that such situation occurs, enhanced due diligence by the form of exporter´s / applicant´s declaration will be undertaken.
	No fixed policy.			
	Other	X	(not specified)	
Spain	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Sweden	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	What additional measures to take depends on the information EKN receives from the exporter and, where appropriate, also the applicant regarding their appearance on the debarment list.
	No fixed policy.			
	Other			
Switzerland	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
Turkey	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
United Kingdom	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
United States (EXIM)	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			
United States (USDA)	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	No fixed policy.			
	Other			