## Section IV: Past Experience

Question 17:

| Please indicate by marking the appropriate boxes if you have had any experience with the following scenarios related to the time **before** credit, cover or other support has been approved: | | You became aware or have reason to believe that | | | | | |
|---|---|---|---|---|---|---|---|
| | | an exporter/ applicant was on one of the debarment lists that you verify, and… | an exporter/ applicant was under charge in a national court for bribery, and… | an exporter/ applicant had been convicted in a national court or had been subject to equivalent national administrative measures for bribery, and… | bribery may be involved in the transaction (e.g. press reports from a reputable source, information provided by participants in the transaction), and… | You became aware of credible evidence that bribery was involved in the award of the export contract for a transaction, and… | Elaboration for "other" answers and/or any additional comments/ clarifications: |
| Australia | you notified law enforcement authorities. | | | | | | For legal reasons, it would not be appropriate to publish this information in the event that we had experienced any of the scenarios above. |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due diligence. | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Austria | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due diligence. | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Belgium | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | X | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due diligence. | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Canada | you notified law enforcement authorities. | | | | | | * Only one instance of an exporter having been charged for bribery and it was in a transaction for which EDC was not involved. |
| | you undertook enhanced due diligence. | X | X* | X* | X | X | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due diligence. | X | X* | X* | X | X | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Czech Republic (EGAP) | you notified law enforcement authorities. | | | | | | No experience |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due diligence. | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |



2006 Survey on Measures Taken to Combat Bribery
in Officially Supported Export Credits - Responses as of 31 December 2009

## Section IV: Past Experience

Question 17:

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|---|---|---|---|---|---|---|---|
| | | an exporter/ applicant was on one of the debarment lists that you verify, and… | an exporter/ applicant was under charge in a national court for bribery, and… | an exporter/ applicant had been convicted in a national court or had been subject to equivalent national administrative measures for bribery, and… | bribery may be involved in the transaction (e.g. press reports from a reputable source, information provided by participants in the transaction), and… | You became aware of credible evidence that bribery was involved in the award of the export contract for a transaction, and… | Elaboration for "other" answers and/or any additional comments/ clarifications: |
| Czech Republic (CEB) | you notified law enforcement authorities. | | | | | | No experience |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due diligence. | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Denmark | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | X | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due diligence. | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Finland | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due diligence. | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| France | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due diligence. | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Germany | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | X | X | X | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due diligence. | | X | X | X | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |

## Section IV: Past Experience

Question 17:

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| | | an exporter/ applicant was on one of the debarment lists that you verify, and… | an exporter/ applicant was under charge in a national court for bribery, and… | an exporter/ applicant had been convicted in a national court or had been subject to equivalent national administrative measures for bribery, and… | bribery may be involved in the transaction (e.g. press reports from a reputable source, information provided by participants in the transaction), and… | You became aware of credible evidence that bribery was involved in the award of the export contract for a transaction, and… | Elaboration for "other" answers and/or any additional comments/ clarifications: |
| Greece | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due … | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Hungary (MEHIB) | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due … | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Hungary (Eximbank) | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due … | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Italy | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due … | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Japan (JBIC) | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due … | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |





## Section IV: Past Experience

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|---|---|---|---|---|---|---|---|
| | | an exporter/ applicant was on one of the debarment lists that you verify, and… | an exporter/ applicant was under charge in a national court for bribery, and… | an exporter/ applicant had been convicted in a national court or had been subject to equivalent national administrative measures for bribery, and… | bribery may be involved in the transaction (e.g. press reports from a reputable source, information provided by participants in the transaction), and… | You became aware of credible evidence that bribery was involved in the award of the export contract for a transaction, and… | Elaboration for "other" answers and/or any additional comments/ clarifications: |
| Japan (NEXI) | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due … | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Korea (Eximbank) | you notified law enforcement authorities. | | | | | | No experience |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due … | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Korea (KEIC) | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due … | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Luxembourg | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due … | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Mexico | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due … | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |

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|---|---|---|---|---|---|---|---|
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| Netherlands | you notified law enforcement authorities. | | | | X | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| New Zealand | you notified law enforcement authorities. | | | | | | The NZECO has had no such experience. |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Norway | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Poland | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Portugal | you notified law enforcement authorities. | | | | | | No experience |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |





## Section IV: Past Experience

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| Please indicate by marking the appropriate boxes if you have had any experience with the following scenarios related to the time **before** credit, cover or other support has been approved: | | You became aware or have reason to believe that | | | | | |
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| | | an exporter/ applicant was on one of the debarment lists that you verify, and… | an exporter/ applicant was under charge in a national court for bribery, and… | an exporter/ applicant had been convicted in a national court or had been subject to equivalent national administrative measures for bribery, and… | bribery may be involved in the transaction (e.g. press reports from a reputable source, information provided by participants in the transaction), and… | You became aware of credible evidence that bribery was involved in the award of the export contract for a transaction, and… | Elaboration for "other" answers and/or any additional comments/ clarifications: |
| Slovak Republic | you notified law enforcement authorities. | | | | | | No experience |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Spain | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Sweden | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Switzerland | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | X | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due | | | | X | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| Turkey | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | | | | | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due | | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |

## Section IV: Past Experience

Question 17:

| Please indicate by marking the appropriate boxes if you have had any experience with the following scenarios related to the time **before** credit, cover or other support has been approved: | | You became aware or have reason to believe that | | | | | |
|---|---|---|---|---|---|---|---|
| | | an exporter/ applicant was on one of the debarment lists that you verify, and… | an exporter/ applicant was under charge in a national court for bribery, and… | an exporter/ applicant had been convicted in a national court or had been subject to equivalent national administrative measures for bribery, and… | bribery may be involved in the transaction (e.g. press reports from a reputable source, information provided by participants in the transaction), and… | You became aware of credible evidence that bribery was involved in the award of the export contract for a transaction, and… | Elaboration for "other" answers and/or any additional comments/ clarifications: |
| United Kingdom | you notified law enforcement authorities. | | | | X | | |
| | you undertook enhanced due diligence. | | | | X | | |
| | you decided not to provide support for the transaction. | | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due | | | | X | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| United States (EXIM) | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | X | | | | | |
| | you decided not to provide support for the transaction. | X | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due | X | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |
| United States (USDA) | you notified law enforcement authorities. | | | | | | |
| | you undertook enhanced due diligence. | X | | | | | |
| | you decided not to provide support for the transaction. | X | | | | | |
| | you suspended approval of the application pending the outcome of the enhanced due | X | | | | | |
| | you suspended approval of the application pending the outcome of the legal process. | | | | | | |
| | other | | | | | | |





## Section IV: Past Experience

Question 17 (continued):

| Please describe the circumstances of the actual incidents noted in the preceding table. Please also provide information on any actions that were taken as a result of situations not listed in the table (e.g. Members who review the details of agents' commissions as part of the standard application process should provide information on any actions that were taken as a result of the review of commissions). | |
|---|---|
| Australia | |
| Austria | |
| Belgium | A mother company located abroad has been accused of bribery abroad. The Belgian subsidiary company has been asked to explain their Management Control Systems. |
| Canada | |
| Czech Republic (EGAP) | |
| Czech Republic (CEB) | |
| Denmark | A board member and shareholder of the buyer was under charge of bribery for offering a New Years present to a public official. It was a big court case including many other people. We contacted a local lawyer and obtained a legal opinion in order to ensure, inter alia, that there was no link between the transaction and the court case. |
| Finland | |
| France | |
| Germany | |
| Greece | |
| Hungary (MEHIB) | |
| Hungary (Eximbank) | |
| Italy | |
| Japan (JBIC) | |
| Japan (NEXI) | |
| Korea (Eximbank) | |
| Korea (KEIC) | |
| Luxembourg | |
| Mexico | |
| Netherlands | |

## Section IV: Past Experience

Question 17 (continued):

| Please describe the circumstances of the actual incidents noted in the preceding table. Please also provide information on any actions that were taken as a result of situations not listed in the table (e.g. Members who review the details of agents' commissions as part of the standard application process should provide information on any actions that were taken as a result of the review of commissions). | |
|---|---|
| New Zealand | |
| Norway | |
| Poland | |
| Portugal | |
| Slovak Republic | |
| Spain | |
| Sweden | |
| Switzerland | The reason the first box ("…you notified law enforcement authorities") cannot be ticked is that we became aware of the case through the press when the law enforcement authorities had already become active. We are unable to give any further details at the moment as the investigation is ongoing and the information on the current applications is commercially confidential. |
| Turkey | |
| United Kingdom | |
| United States (EXIM) | |
| United States (USDA) | |