Section III: Actions Taken in Relation to a Specific Transaction After Credit, Cover or Other Support Has Been Approved

Question 14:

If, **after** credit, cover or other support has been approved, you have reason to believe that **bribery may be involved in the transaction** (e.g. press reports from a reputable source, information provided by participants in the transaction) related to the award of the export contract, what action(s) are taken?				Elaboration for "other" answers and/or any additional comments/clarifications:
Australia	Law enforcement authorities are informed			Any suspicion and/or evidence obtained on the involvement of bribery in a relation to an export contract in respect of which EFIC has provided a facility is to be brought to the attention of the Executive Team (including EFIC's Managing Director). A decision will be made by EFIC's Managing Director and his Executive Team with a view to undertaking enhanced due diligence if we have reason to believe that bribery may be involved in the transaction. The outcome of this investigation will determine further action EFIC eventually takes on the existing facility. Such actions include, but are not limited to, the cancellation of the transaction or acceleration of repayments.
	Enhanced due diligence is undertaken			
	Other	X	always	
Austria	Law enforcement authorities are informed	X	always	OeKB would inform the Ministry of Finance which would inform the law enforcement authorities.
	Enhanced due diligence is undertaken	X	always	
	Other			
Belgium	Law enforcement authorities are informed			See Disclosure Procedure. Case by case. The Chief Underwriting, the Dicrectors and the Board take the decision.
	Enhanced due diligence is undertaken	X	always	
	Other			
Canada	Law enforcement authorities are informed			In addition to undertaking enhanced due diligence, no further support will be provided to the relevant party, whether in a related transaction or otherwise, until such time as EDC is satisfied there was no bribery involved in the transaction or that satisfactory systems have been implemented to deter further bribery.
	Enhanced due diligence is undertaken	X	always	
	Other			
Czech Republic (EGAP)	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken			
	Other			
Czech Republic (CEB)	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken			
	Other			
Denmark	Law enforcement authorities are informed	X	sometimes	Cover under the guarantee will be void in case of bribery.
	Enhanced due diligence is undertaken	X	always	
	Other	X	always	
Finland	Law enforcement authorities are informed			
	Enhanced due diligence is undertaken	X	always	
	Other			
France	Law enforcement authorities are informed	X	sometimes	Charte éthique Coface applicable aux procédures publiques : dispositions relatives à la lutte contre la corruption Si, après vérifications, il apparaît que la transaction pourrait être entachée de corruption d'agents publics étrangers, le Directeur du Moyen Terme ou le Directeur de l'Assurance Prospection, selon le cas, pourra décider de saisir le comité anti-corruption.
	Enhanced due diligence is undertaken	X	always	
	Other			
Germany	Law enforcement authorities are informed	X	sometimes	Law enforcement authorities will be informed in coordination with the German Guardian authorities if the further due diligence comes to the conclusion that this is necessary.
	Enhanced due diligence is undertaken	X	always	
	Other			
Greece	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Other			

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Hungary (MEHIB)	Law enforcement authorities are informed	X	always	In-house ad hoc Anti –Bribery Committe (MEHIB) takes necessary measures.
	Enhanced due diligence is undertaken			
	Other			
Hungary (Eximbank)	Law enforcement authorities are informed	X	always	The relevant permanent Censorship Committee (Eximbank) takes necessary measures.
	Enhanced due diligence is undertaken			
	Other			
Italy	Law enforcement authorities are informed			Please see comments on question 12.
	Enhanced due diligence is undertaken			
	Other	X	always	
Japan (JBIC)	Law enforcement authorities are informed	X	sometimes	Law enforcement authorities are informed when we find credible evidence as a result of the enhanced due diligence.
	Enhanced due diligence is undertaken	X	always	
	Other			
Japan (NEXI)	Law enforcement authorities are informed			It seems to be difficult for us to recognize the press reports from a reputable source and information provided by participants in the transaction as a reason to believe that bribery may be involved in the transaction.
	Enhanced due diligence is undertaken	X	always	
	Other			
Korea (Eximbank)	Law enforcement authorities are informed			
	Enhanced due diligence is undertaken	X	always	
	Other			
Korea (KEIC)	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken			
	Other			
Luxembourg	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Other			
Mexico	Law enforcement authorities are informed	X	always	When the crime may affect the Institution directly, such crime is communicated to the authority and Bancomext would withdraw the approval of such credit, cover or support.
	Enhanced due diligence is undertaken			
	Other	X	always	
Netherlands	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Other			
New Zealand	Law enforcement authorities are informed			
	Enhanced due diligence is undertaken	X	always	
	Other			
Norway	Law enforcement authorities are informed	X	sometimes	Whether the law enforcement authorities are informed would depend on the actual evidence received. GIEK would consider to withdraw cover alternatively reclaim compensation paid or forward a recourse claim against the exporter.
	Enhanced due diligence is undertaken	X	always	
	Other			
Poland	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken			
	Other			
Portugal	Law enforcement authorities are informed	X	sometimes	Law enforcement authorities can be informed of suspicion of bribery having occurred, after coordination with the Council for the Financial Guarantees, Exports and Investment pending on a case by case evaluation.
	Enhanced due diligence is undertaken	X	always	
	Other			

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Slovak Republic	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Other			
Spain	Law enforcement authorities are informed			
	Enhanced due diligence is undertaken	X	always	
	Other			
Sweden	Law enforcement authorities are informed			
	Enhanced due diligence is undertaken	X	always	
	Other			
Switzerland	Law enforcement authorities are informed			
	Enhanced due diligence is undertaken	X	always	
	Other			
Turkey	Law enforcement authorities are informed	X	always	Turk Eximbank suspends any further disbursements or claims until the official investigation is over.
	Enhanced due diligence is undertaken			
	Other	X	always	
United Kingdom	Law enforcement authorities are informed	X	always	Many of ECGD's rights only arise once an exporter, or anyone acting on that exporter's behalf, has been convicted of bribery. Accordingly, ECGD will have to wait until the relevant criminal proceedings have been concluded before it may exercise those rights. Where ECGD has a right to claim compensation as a result of corrupt activity, this right will only arise where ECGD has suffered loss as a result of the corrupt activity in question and that activity has been proved by a judgement in a criminal or civil court of competent jurisdiction.
	Enhanced due diligence is undertaken	X	always	
	Other			
United States (EXIM)	Law enforcement authorities are informed	X	sometimes	Law enforcement authorities will be informed if it is determined, after appropriate investigation, that the allegations of bribery are credible.
	Enhanced due diligence is undertaken	X	always	
	Other			
United States (USDA)	Law enforcement authorities are informed	X	always	Any further applications received would be held pending investigation by FAS staff and the OIG.
	Enhanced due diligence is undertaken	X	always	
	Other	X	always	