Section I: General Measures to Deter Bribery

Question 4:

Do you verify and note whether exporters, and where appropriate, applicants, are listed on the publicly available debarment lists of the following international financial institutions (IFIs): World Bank Group, African Development Bank, Asian Development Bank, European Bank for Reconstruction and Development and the Inter-American Development Bank?		If yes: a) Which actors associated with the transaction are subject to verification?			Elaboration for "other (*e.g.* agents)" answers and/or any additional comments/clarifications:
Australia	Yes, always	the applicant	X	at the time of application	In cases where an application form has not been submitted for a particular transaction, EFIC ensures that this Declaration is obtained by requiring the exporter, and where appropriate applicants, to provide a written statement as a condition to acceptance of EFIC's Letter of Offer.
		the exporter(s)	X	at the time of application	
		other			
Austria	Yes, always	the applicant	X	at the time of application	In case of a buyer's credit the exporter has to submit a stand-alone declaration additionally.
		the exporter(s)	X	at the time of application	
		other			
Belgium	Yes, always	the applicant	X	both at the time of application and before support is provided	Staff check the list of the World Bank
		the exporter(s)	X	both at the time of application and before support is provided	
		other	X	both at the time of application and before support is provided	
Canada	Yes, always	the applicant	X	both at the time of application and before support is provided	"other" means any counterparty to the transaction in question. Depending on the product in question, the exporter/applicant self-declaration is either in the application form and verification is achieved at the time of the application, or it is received before support is provided through a stand-alone declaration.
		the exporter(s)	X	both at the time of application and before support is provided	
		other	X	both at the time of application and before support is provided	
Czech Republic (EGAP)	Yes, always	the applicant	X	both at the time of application and before support is provided	Intermediaries
		the exporter(s)	X	both at the time of application and before support is provided	
		other	X	both at the time of application and before support is provided	
Czech Republic (CEB)	Yes, always	the applicant	X	at the time of application	
		the exporter(s)	X	at the time of application	
		other			

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Question 4:

Do you verify and note whether exporters, and where appropriate, applicants, are listed on the publicly available debarment lists of the following international financial institutions (IFIs): World Bank Group, African Development Bank, Asian Development Bank, European Bank for Reconstruction and Development and the Inter-American Development Bank?		If yes: a) Which actors associated with the transaction are subject to verification?			Elaboration for "other (*e.g.* agents)" answers and/or any additional comments/clarifications:
Denmark	Yes, always	the applicant	X	before support is provided	
		the exporter(s)	X	before support is provided	
		other			
Finland	Yes, always	the applicant	X	before support is provided	Agents might be checked if there is a reason to conduct the enhanced due diligence.
		the exporter(s)	X	before support is provided	
		other	X	(not specified)	
France	Yes, always	the applicant	X	both at the time of application and before support is provided	Pour les opérations financées par crédit acheteur, l'inscription de la banque prêteuse sur les listes d'exclusion est également vérifiée.
		the exporter(s)	X	both at the time of application and before support is provided	
		other			
Germany	Yes, always	the applicant	X	at the time of application	
		the exporter(s)	X	at the time of application	
		other			
Greece	Yes, always	the applicant	X	at the time of application	
		the exporter(s)	X	at the time of application	
		other			
Hungary (MEHIB)	Yes, always	the applicant	X	at the time of application	
		the exporter(s)	X	at the time of application	
		other			
Hungary (Eximbank)	Yes, always	the applicant	X	at the time of application	
		the exporter(s)	X	at the time of application	
		other			
Italy	Yes, always	the applicant	X	at the time of application	
		the exporter(s)	X	at the time of application	
		other			

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Question 4:

Do you verify and note whether exporters, and where appropriate, applicants, are listed on the publicly available debarment lists of the following international financial institutions (IFIs): World Bank Group, African Development Bank, Asian Development Bank, European Bank for Reconstruction and Development and the Inter-American Development Bank?		If yes: a) Which actors associated with the transaction are subject to verification?			Elaboration for "other (*e.g.* agents)" answers and/or any additional comments/clarifications:
Japan (JBIC)	Yes, always	the applicant	X	at the time of application	
		the exporter(s)	X	at the time of application	
		other			
Japan (NEXI)	Yes, always	the applicant	X	before support is provided	
		the exporter(s)	X	before support is provided	
		other			
Korea (Eximbank)	Yes, always	the applicant	X	at the time of application	
		the exporter(s)	X	at the time of application	
		other			
Korea (KEIC)	Yes, always	the applicant	X	at the time of application	
		the exporter(s)	X	at the time of application	
		other			
Luxembourg	Yes, always	the applicant	X	at the time of application	
		the exporter(s)	X	at the time of application	
		other			
Mexico	Yes, sometimes	the applicant			Another banks in the case of second floor credits
		the exporter(s)	X		
		other	X		
Netherlands	Yes, always	the applicant			Atradius DSB always ask exporters in the application form the amount of commission being paid, the name and address of the agent to whom commission is being paid and the work done for the commission paid. Normally 5% of the contract amount or EUR 4.500.000 (whichever is the lowest) is the limit, even if explanation is provided.
		the exporter(s)	X	both at the time of application and before support is provided	
		other	X	both at the time of application and before support is provided	

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Question 4:

Do you verify and note whether exporters, and where appropriate, applicants, are listed on the publicly available debarment lists of the following international financial institutions (IFIs): World Bank Group, African Development Bank, Asian Development Bank, European Bank for Reconstruction and Development and the Inter-American Development Bank?		If yes: a) Which actors associated with the transaction are subject to verification?			Elaboration for "other (*e.g.* agents)" answers and/or any additional comments/clarifications:
New Zealand	Yes, always	the applicant	X	both at the time of application and before support is provided	In practice the disclosures and self-declarations are asked to be submitted at the time of application, and any follow up work by NZECO staff (such as checking debarment lists) is undertaken after that, but before any support is provided.
		the exporter(s)	X	both at the time of application and before support is provided	
		other			
Norway	Yes, always	the applicant	X	at the time of application	
		the exporter(s)	X	both at the time of application and before support is provided	
		other			
Poland	Yes, always	the applicant	X	both at the time of application and before support is provided	
		the exporter(s)	X	both at the time of application and before support is provided	
		other			
Portugal	Yes, always	the applicant	X	both at the time of application and before support is provided	Identification of the agents to ascertain their credibility is sought, if necessary.
		the exporter(s)	X	both at the time of application and before support is provided	
		other	X	before support is provided	
Slovak Republic	Yes, always	the applicant	X	at the time of application	Subject to verification is an exporter, where appropriate an applicant.
		the exporter(s)	X	at the time of application	
		other			
Spain	Yes, always	the applicant	X	before support is provided	
		the exporter(s)	X	before support is provided	
		other			

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Question 4:

Do you verify and note whether exporters, and where appropriate, applicants, are listed on the publicly available debarment lists of the following international financial institutions (IFIs): World Bank Group, African Development Bank, Asian Development Bank, European Bank for Reconstruction and Development and the Inter-American Development Bank?		If yes: a) Which actors associated with the transaction are subject to verification?			Elaboration for "other (*e.g.* agents)" answers and/or any additional comments/clarifications:
Sweden	Yes, always	the applicant	X	at the time of application	
		the exporter(s)	X	at the time of application	
		other			
Switzerland	Yes, always	the applicant	X	at the time of application	For SERV, "other" in this question means "agents". As a rule, SERV requires the verification at the time of application. However, should the applicant have questions, (some have found it difficult to find the debarment lists), SERV would continue to process the transaction but would not provide any support until the undertaking / declaration has been submitted.
		the exporter(s)	X	at the time of application	
		other	X	at the time of application	
Turkey	Yes, always	the applicant			
		the exporter(s)	X	before support is provided	
		other			
United Kingdom	Yes, always	the applicant	X	at the time of application	All named agents. For all exporters, companies acting as the main insured under ECA Reinsurance cases, buyers, borrowers and guarantors and for any agent or other intermediary, joint venture partner and consortium member.
		the exporter(s)	X	at the time of application	
		other	X	at the time of application	
United States (EXIM)	Yes, always	the applicant	X	before support is provided	Other transaction participants, including borrowers, guarantors and agents, are checked against the United States Government debarment lists as appropriate.
		the exporter(s)	X	before support is provided	
		other	X	before support is provided	

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Question 4:

Do you verify and note whether exporters, and where appropriate, applicants, are listed on the publicly available debarment lists of the following international financial institutions (IFIs): World Bank Group, African Development Bank, Asian Development Bank, European Bank for Reconstruction and Development and the Inter-American Development Bank?		If yes: a) Which actors associated with the transaction are subject to verification?			Elaboration for "other (*e.g.* agents)" answers and/or any additional comments/clarifications:
United States (USDA)	No	the applicant	X	both at the time of application and before support is provided	The applicant is the exporter in the case of the GSM programs. All participants in the guarantee transaction i.e. exporters, importers, banks are subject to daily system verification. We conduct ongoing checks (nightly in our system) against debarment lists for parties excluded from doing business under U.S. government programs or from exporting from the the U.S. However, the system does not currently check against the bank lists specifically mentioned in the question. We are reviewing this to see how we can incorporate these additional checks in our system. We have provided links to the IFI's websites (see the text under Question 2 b)).
		the exporter(s)			
		other			

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Question 4 (continued):

b) Please indicate how the verification is achieved:				Elaboration for "other" answers and/or any additional comments/clarifications:
Australia	staff check the lists	X	before support is provided	In cases where an application form has not been submitted for a particular transaction, EFIC ensures that this Declaration is obtained by requiring the exporter, and where appropriate applicants, to provide a written statement as a condition to acceptance of EFIC's Letter of Offer. Aside from the Declaration in the credit application form, verification is also obtained as part of our due diligence. Publicly available debarment lists (currently only the World Bank listing) are checked as part of the due diligence (pre-approval phase) conducted on a proposed transaction.
	exporter/applicant self-declaration	X	at the time of application	
	other			
Austria	staff check the lists	X	at the time of application	
	exporter/applicant self-declaration	X	at the time of application	
	other			
Belgium	staff check the lists	X	at the time of application	
	exporter/applicant self-declaration	X	at the time of application	
	other			
Canada	staff check the lists	X	before support is provided	"other" means any counterparty to the transaction in question. Depending on the product in question, the exporter/applicant self-declaration is either in the application form and verification is achieved at the time of the application, or it is received before support is provided through a stand-alone declaration. At EDC, the lists are reviewed on a monthly basis and debarred counterparties are entered into our transaction processing system. At any time a transaction is entered into the system with a counterparty that has been debarred, a flag will appear warning the underwriter to undertake enhanced due diligence.
	exporter/applicant self-declaration	X	both at the time of application and before support is provided	
	other	X	both at the time of application and before support is provided	
Czech Republic (EGAP)	staff check the lists	X	both at the time of application and before support is provided	Intermediaries; consult the declaration of the exporter above. Debarment list of the WB is fortnightly compared with all subjects in the documentation system of EGAP. If there would be any subject on the debarment list, all underwriters will be immediately informed on this fact.
	exporter/applicant self-declaration	X	both at the time of application and before support is provided	
	other	X	both at the time of application and before support is provided	
Czech Republic (CEB)	staff check the lists	X	before support is provided	Presently only World Bank Debarment List is used.
	exporter/applicant self-declaration	X	before support is provided	
	other			

Section I: General Measures to Deter Bribery

Question 4 (continued):

b) Please indicate how the verification is achieved:				Elaboration for "other" answers and/or any additional comments/clarifications:
Denmark	staff check the lists			Self-declaration by way of checkboxes in the declaration of non-bribery. EKF is considering whether to include this in the application form.
	exporter/applicant self-declaration	X	before support is provided	
	other			
Finland	staff check the lists	X	before support is provided	With regard to the short term guarantees the underwriters check the publicly available debarment lists. With regard to the long term guarantees and interest equalisation the exporter/applicant confirms this matter in the anti-bribery declaration (see question 3 point c) and the text provided point 1 f)). Random checks of the lists are also carried out by the staff.
	exporter/applicant self-declaration	X	before support is provided	
	other			
France	staff check the lists	X	both at the time of application and before support is provided	Questions dans la rubrique "lutte contre la corruption" du Formulaire de demande d'assurance crédit: 1- Le demandeur figure-t-il sur une liste d'exclusion accessible au public du Groupe de la Banque mondiale, de la Banque africaine de développement, de la Banque asiatique de développement, de la Banque européenne pour la reconstruction et le développement, de la Banque inter-américaine de développement ? ☐ oui ☐ non
		X	both at the time of application and before support is provided	
	other			
Germany	staff check the lists	X	at the time of application	
	exporter/applicant self-declaration			
	other			
Greece	staff check the lists	X	at the time of application	
	exporter/applicant self-declaration			
	other			
Hungary (MEHIB)	staff check the lists	X	at the time of application	
	exporter/applicant self-declaration			
	other			
Hungary (Eximbank)	staff check the lists	X	at the time of application	
	exporter/applicant self-declaration			
Italy	staff check the lists			
	exporter/applicant self-declaration	X	at the time of application	
	other			
Japan (JBIC)	staff check the lists			
	exporter/applicant self-declaration	X	at the time of application	
	other			

Section I: General Measures to Deter Bribery

Question 4 (continued):

b) Please indicate how the verification is achieved:				Elaboration for "other" answers and/or any additional comments/clarifications:
Japan (NEXI)	staff check the lists	X	before support is provided	
	exporter/applicant self-declaration			
	other			
Korea (Eximbank)	staff check the lists	X	at the time of application	
	exporter/applicant self-declaration	X	at the time of application	
	other			
Korea (KEIC)	staff check the lists	X	at the time of application	
	exporter/applicant self-declaration	X	at the time of application	
	other			
Luxembourg	staff check the lists	X	at the time of application	
	exporter/applicant self-declaration	X	at the time of application	
	other			
Mexico	staff check the lists	X		We check only in case of loans that are funded by a multilateral organization
	exporter/applicant self-declaration			
	other			
Netherlands	staff check the lists	X	both at the time of application and before support is provided	
	exporter/applicant self-declaration	X	both at the time of application and before support is provided	
	other			
New Zealand	staff check the lists	X	before support is provided	The applicant is required to provide a declaration that "neither I, nor any persons acting on my behalf, is listed on the publicly available debarment list of the World Bank Group or of any similar international financial institution" and as part of the due diligence publicly available debarment lists are checked by NZECO staff members.
	exporter/applicant self-declaration	X	at the time of application	
	other			
Norway	staff check the lists			Before guarantee is issued, the exporter will have to sign an exporters statement including a confirmation that the information given in the application is still valid.
	exporter/applicant self-declaration	X	both at the time of application and before support is provided	
	other			
Poland	staff check the lists	X	both at the time of application and before support is provided	KUKE S.A. included links to the debarment lists on web site in order to facilitate the self-verification by the exporter/applicant.
	exporter/applicant self-declaration	X	both at the time of application and before support is provided	
	other			
Portugal	staff check the lists	X	before support is provided	As a matter of rule the exporter must report the amount of fees and commissions paid. If such amounts are excessive in relation to the usual business standard, COSEC will ask for detailed explanation and if necessary will conduct an enhanced due diligence procedure.
	exporter/applicant self-declaration	X	at the time of application	
	other			

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Section I: General Measures to Deter Bribery

Question 4 (continued):

b) Please indicate how the verification is achieved:				Elaboration for "other" answers and/or any additional comments/clarifications:
Slovak Republic	staff check the lists			
	exporter/applicant self-declaration	X	at the time of application	
	other			
Spain	staff check the lists	X	before support is provided	
	exporter/applicant self-declaration			
	other			
Sweden	staff check the lists			Following information from the OECD Secretariat that only the debarments list of the World Bank Group and EBRD are publicly available for the moment, EKN/SEK verifies and notes whether the exporter/applicant is listed on the debarment list of the two institutions.
	exporter/applicant self-declaration	X	at the time of application	
	other			
Switzerland	staff check the lists			See the text provided under Question 1 b). As a rule, SERV requires the verification at the time of application. However, should the applicant have questions, (some have found it difficult to find the debarment lists), SERV would continue to process the transaction but would not provide any support until the undertaking / declaration has been submitted.
	exporter/applicant self-declaration	X	at the time of application	
	other			
Turkey	staff check the lists			
	exporter/applicant self-declaration	X	before support is provided	
	other			
United Kingdom	staff check the lists	X	at the time of application	ECGD checks those debarment lists that are publicly available and these are currently the lists maintained by the World Bank, the Inter-American Development Bank, Asian Development Bank and the European Bank for Reconstruction and Development.
	exporter/applicant self-declaration	X	at the time of application	
	other			
United States (EXIM)	staff check the lists	X	before support is provided	
	exporter/applicant self-declaration	X	at the time of application	
	other			
United States (USDA)	staff check the lists	X	both at the time of application and before support is provided	The GSM database is designed to check automatically the Department of Treasury's Office of Financial Assets & Control (OFAC) List nightly for debarred applicants. This list provides individual names and organizations that have been debarred. In addition, the Department of Commerce's Excluded Party List (EPLS) is also checked nightly by the GSM database.
	exporter/applicant self-declaration			
	other	X	both at the time of application and before support is provided	

Section I: Measures to Deter Bribery

Question 4 (continued):

Please describe any additional measures taken in relation to current or past debarment of exporters/applicants by other institutions:	
Australia	
Austria	
Belgium	
Canada	
Czech Republic (EGAP)	
Czech Republic (CEB)	
Denmark	
Finland	
France	Formulaire de demande d'assurance crédit: Le demandeur s'engage à tenir Coface informée de toute modification des informations figurant dans la demande d'assurance-crédit et ses annexes et de toute modification dans la nature ou l'importance des risques dont la couverture est sollicitée. Conditions Générales des Polices (Gestion du risque) L'Assuré s'engage, sous peine de sanctions à informer la Compagnie immédiatement en cas d'apparition de son Etablissement sur une des listes accessibles au public des institutions internationales suivantes : Groupe Banque Mondiale, Banque africaine de développement, Banque asiatique de développement, Banque européenne pour la reconstruction et le développement et Banque inter-américaine de développement ;
Germany	
Greece	
Hungary (MEHIB)	
Hungary (Eximbank)	
Italy	
Japan (JBIC)	
Japan (NEXI)	
Korea (Eximbank)	
Korea (KEIC)	
Luxembourg	

Section I: Measures to Deter Bribery

Question 4 (continued):

Please describe any additional measures taken in relation to current or past debarment of exporters/applicants by other institutions:	
Mexico	
Netherlands	
New Zealand	
Norway	
Poland	
Portugal	In general, the Policy holder is obliged to inform COSEC of any modification of the information reported in the application form previously submitted to the Insurer, which has impact in the risk assessment, specially if it involves the status and creditworthiness of any party related to the export credit transaction.
Slovak Republic	
Spain	
Sweden	
Switzerland	
Turkey	Additionally, Article 6 of Turk Eximbank's "Directives on Combating Bribery of Foreign Public Officials in International Business Transctions" , which is an internal document, reads as: Should the companies, as the exporter of goods/services benefiting from support, whether or not they are the direct applicants, declare their noncompliance against the Articles 2 or 3 of the Undertaking at the time of the application, such application may be taken into consideration if; d. The bribing employee was dismissed, e. The Company has a well established "management control system", f. The Company agrees to have an independent audit carried out and to deliver these reports as the Bank may require, d. The Company agrees to take other measures as the Bank may require
United Kingdom	In the application form the applicant is required to declare that: - neither it nor any of its Directors appears on any list of contractors or individuals debarred from tendering for or participating in any project funded by the World Bank or any other multilateral or bilateral aid agency; - it has made reasonable enquiries for the purpose of ascertaining whether any Group Companies, at the date of Application, have had, or, are intended to have, any material part in the negotiation or obtaining of the Supply Contract; - it has made reasonable enquiries in relation to any Senior Manager, Agent, Consortium Partner and Involved Group Company in order to ascertain whether any of them (or any Directors of any Consortium Partner or of any Involved Group Company or, if a corporate entity, of any Agent) appears on any list of contractors or individuals debarred from tendering for or participating in any project funded by the World Bank or any other multilateral or bilateral aid agency or has at any time during the last five years, admitted to having engaged in, or been convicted of engaging in, any Corrupt Activity; and - those enquiries have given it no cause to believe, and it does not believe, that any Senior Manager, Agent, Consortium Partner or Involved Group Company, or any of the Directors of any Consortium Partner, Involved Group Company or Agent, appears on any list of contractors or individuals debarred from tendering for or participating in any project funded by the World Bank or any other multilateral or bilateral aid agency or has at any time during the last five years, admitted (other than under duress) to having engaged, or been found by a court in any competent jurisdiction to have engaged, in any Corrupt Activity that has not previously been notified to ECGD.

Section I: Measures to Deter Bribery

Question 4 (continued):

Please describe any additional measures taken in relation to current or past debarment of exporters/applicants by other institutions:	
United Kingdom (contn'd)	In the application: “Agent” means any agent, intermediary, consultant or other person: - who has been instructed by the applicant or on the applicants behalf; and -who has been directly or indirectly involved in the process of tendering for, or seeking the award of, the Supply Contract or any Related Agreement; “Consortium Partner” means any company (other than the applicant), person or other legal entity which is a party to any written joint venture, consortium, or other similar arrangement (other than a sub-contract) to which the applicant is also a party and which joint venture, consortium or other arrangement has been, or will be, entered into in connection with the performance or financing of all, or any part of, the Supply Contract “control” and “controlled” means, in relation to a company (the “company controlled”), control of the company controlled (1) by virtue of any contractual arrangements including, without limitation, any provisions in the memorandum and articles of association (or the equivalent documents in the case of a company incorporated in a jurisdiction other than that of England and Wales) of the company controlled or any other company and/or (2) by virtue of ownership (whether directly or through nominees or trustees) of more than 50% of the voting share capital of the company controlled or (3) through a chain of companies each of which controls the next by the means described at (1) and/or (2) above “Directors” means, in relation to a company, the members of that company's board of directors (including non-executive directors); “Group Company” means a company (in any jurisdiction) which is controlled by the applicant or which controls the applicant or which is controlled by a company which controls the applicant; “Involved Group Company” means a Group Company which the applicant, having made the reasonable enquiries referred to in the application, believe has had, or is intended to have, at the date of the Application, any material part in the negotiation or obtaining of the Supply Contract.
United States (EXIM)	In addition to references to the lists in the application and exporter's certificate, Ex-Im Bank's website contains links to the debarment lists.
United States (USDA)	USDA staff will unqualify (bar participation in the program) exporters in the system if their names appear on the OFAC, EPLS list or any other publicly available debarment list.