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

Question 13:

If, **before** credit, cover or other support has been approved, you become aware of **credible evidence that bribery was involved in the award of the export contract for the transaction**, what action(s) are taken?				Elaboration for "other" answers and/or any additional comments/clarifications:
Australia	Law enforcement authorities are informed	X	always	In determining as to whether there is “credible evidence”, Australia (EFIC) seeking external legal advice is in essence the likely first avenue in making such determination albeit we may consider other avenues such as consulting with relevant government agencies.
	Enhanced due diligence is undertaken	X	sometimes	
	Support is not provided for the transaction			
	Other			
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			
	Support is not provided for the transaction	X	always	
	Other			
Belgium	Law enforcement authorities are informed	X	always	The information of the autorities is a competence of the management or the board as described in our disclosure procedure. For combating bribery, we have a standard procedure in place (i.e. basic checks). If these checks, in combination with other elements (discovered thanks to the experience of the underwriter) lead to the conclusion that bribery might be involved, enhanced due diligence is required, even if chance are extremely small. If the enhanced due diligence procedure leads to conclude that the risk of bribery is real, we do always inform the law enforcement authorities. By stating that we do “not always inform the law enforcement authorities”, we mean we do not inform them if the enhanced due diligence procedure leads to conclude that bribery is very unlikely.
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			
Canada	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken			
	Support is not provided for the transaction	X	always	
	Other			
Czech Republic (EGAP)	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			
Czech Republic (CEB)	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			
Denmark	Law enforcement authorities are informed	X	always	No experience to date. Reporting to law enforcement authorities will be depending on how strong the evidence is. Enhanced due diligence may be pointless if the evidence is conclusive and support is not provided.
	Enhanced due diligence is undertaken	X	sometimes	
	Support is not provided for the transaction	X	always	
	Other			

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

Question 13:

If, **before** credit, cover or other support has been approved, you become aware of **credible evidence that bribery was involved in the award of the export contract for the transaction**, what action(s) are taken?				Elaboration for "other" answers and/or any additional comments/clarifications:
Finland	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction	X	sometimes	
	Other			
France	Law enforcement authorities are informed	X	always	Le Comité anti corruption est saisi des dossiers où des soupçons de corruption se posent. S’il considère qu’il s’agit d’indices sérieux de corruption, il décide d’en informer les Autorités de tutelle. We would like to point out that last year(2009) France adjusted its answer to question 13 only because of a misunderstanding, but France has always met the requirements in connection with law enforcement authorities. As a matter of fact the misunderstanding was due to the difficulty of interpretation of credible evidence in French Law and our first answer was “not always” because Coface has to assess any bribery suspicion before considering it as credible evidence to be transmitted.
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction	X	sometimes	
	Other			
Germany	Law enforcement authorities are informed	X	always	If there is credible evidence that bribery was involved in the award of the export contract for Transaction than the decision whether support can be provided is suspended until verification. Law enforcement authorities will be informed after the German Guardian Authorities have been consulted.
	Enhanced due diligence is undertaken			
	Support is not provided for the transaction	X	always	
	Other			
Greece	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			
Hungary (MEHIB)	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			

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

Question 13:

If, **before** credit, cover or other support has been approved, you become aware of **credible evidence that bribery was involved in the award of the export contract for the transaction**, what action(s) are taken?				Elaboration for "other" answers and/or any additional comments/clarifications:
Hungary (Eximbank)	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			
Italy	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken			
	Support is not provided for the transaction			
	Other			
Japan (JBIC)	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			
Japan (NEXI)	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			
Korea (Eximbank)	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			
Korea (KEIC)	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			
Luxembourg	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken			
	Support is not provided for the transaction	X	always	
	Other			
Mexico	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken			
	Support is not provided for the transaction	X	always	
	Other			
Netherlands	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken			
	Support is not provided for the transaction	X	always	
	Other			
New Zealand	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			
Norway	Law enforcement authorities are informed	X	always	Whether support is provided or not will depend on the outcome of the due diligence. The approval of the application will be suspended.
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction	X	sometimes	
	Other			
Poland	Law enforcement authorities are informed	X	always	KUKE S.A. always undertake enhanced due diligence while cover might be refused sometimes.
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction	X	sometimes	
	Other			

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

Question 13:

If, **before** credit, cover or other support has been approved, you become aware of **credible evidence that bribery was involved in the award of the export contract for the transaction**, what action(s) are taken?				Elaboration for "other" answers and/or any additional comments/clarifications:
Portugal	Law enforcement authorities are informed	X	always	If there is credible evidence that bribery was involved in the award of the export contract , the decision to provide cover will be suspended until full verification; All information collected will be submitted to the Management Board of COSEC and subsequently to the Council for the Financial Guarantees , Exports and Investment that together with the Guardian Authorities will take the final decision to report it to the Law enforcement authorities.
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			
Slovak Republic	Law enforcement authorities are informed	X	always	If before support EXIMBANKA SR becomes aware of credible evidence that bribery was involved in the award of the export contract for the transaction, approval of the application is suspended during the enhanced due diligence process. If the enhanced due diligence concluded that bribery was involved in the transaction, EXIMBANKA SR refuses to approve credit, cover or other support.
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction	X	always	
	Other			
Spain	Law enforcement authorities are informed	X	always	If there is any evidence that has the potential to constitute credible evidence that bribery was involved at any time in the award or execution of the export transactions, the issue shall be brought to the agenda of the Board of Directors of CESCE by the related department. The Board of Directors shall discuss the issue promptly and –if so required- shall inform the public prosecution office and take the necessary measures.
	Enhanced due diligence is undertaken			
	Support is not provided for the transaction			
	Other			
Sweden	Law enforcement authorities are informed	X	always	EKN will always do an enhanced due diligence in these cases, and depending on the outcome of such due diligence EKN will either provide support or not. As long as the credible evidence remains, EKN will not provide support. During the time of due diligence the application will be put on hold.
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			
Switzerland	Law enforcement authorities are informed	X	always	According to our enhanced due diligence process, the board of directors have to approve the involvement of the law enforcement authorities. There is a possibility that the board of directors do not approve the involvement of the law enforcement authorities
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			
Turkey	Law enforcement authorities are informed	X	always	See comments provided under Question 12
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			
United Kingdom	Law enforcement authorities are informed	X	always	
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction			
	Other			

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

Question 13:

If, **before** credit, cover or other support has been approved, you become aware of **credible evidence that bribery was involved in the award of the export contract for the transaction**, what action(s) are taken?				Elaboration for "other" answers and/or any additional comments/clarifications:
United States (EXIM)	Law enforcement authorities are informed	X	always	When Ex-Im Bank receives credible evidence of bribery before approval of the transaction, processing of the transaction is always suspended and law enforcement authorities are informed. If the law enforcement investigation results in no action, Ex-Im Bank nevertheless engages in its own enhanced due diligence prior to any approval of the transaction.
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction	X	always	
	Other			
United States (USDA)	Law enforcement authorities are informed	X	sometimes	See comments under Question 11.
	Enhanced due diligence is undertaken	X	always	
	Support is not provided for the transaction	X	sometimes	
	Other	X	always	

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

Question 13 (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) How is the application treated?			Elaboration for "other" answers and/or any additional comments/ clarifications:
Australia	No	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.			
		No fixed policy.			
		Other			
Belgium	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Canada		The approval of the application is suspended pending the outcome of the enhanced due diligence process.			
		No fixed policy.			
		Other			
Czech Republic (EGAP)	Yes, always	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)	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Denmark	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Finland	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
France	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Germany		The approval of the application is suspended pending the outcome of the enhanced due diligence process.			
		No fixed policy.			
		Other			
Greece	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Hungary (MEHIB)	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Hungary (Eximbank)	Yes, always	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 13 (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) How is the application treated?			Elaboration for "other" answers and/or any additional comments/ clarifications:
Italy		The approval of the application is suspended pending the outcome of the enhanced due diligence process.			
		No fixed policy.			
		Other			
Japan (JBIC)	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Japan (NEXI)	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Korea (Eximbank)	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Korea (KEIC)	Yes, always	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.			
		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.			
		No fixed policy.			
		Other			
New Zealand	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Norway	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Poland	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Portugal	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Slovak Republic	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			

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

Question 13 (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) How is the application treated?			Elaboration for "other" answers and/or any additional comments/ clarifications:
Spain		The approval of the application is suspended pending the outcome of the enhanced due diligence process.			
		No fixed policy.			
		Other			
Sweden	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Switzerland	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Turkey	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
United Kingdom	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	ECGD takes such action as is reasonably practicable provided that it would not prejudice any investigation which is being, or may be, undertaken by any investigatory authority.
		No fixed policy.			
		Other			
United States (EXIM)	Yes, always	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)	Yes, sometimes	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 13 (continued):

If investigative authorities are informed:				Elaboration for "other" answers and/or any additional comments/clarifications:
	c) How is the application treated?			
Australia	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Austria	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Belgium	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Canada	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Czech Republic (EGAP)	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Czech Republic (CEB)	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Denmark	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Finland	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	In case we become aware of the credible evidence the support is not provided and the enhanced due diligence is conducted. However, should the outcome of the review by the law enforcement authorities show that there were no bribery involved, the support is reconsidered.
	No fixed policy.			
	Other			
France	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Germany	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Greece	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	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 13 (continued):

If investigative authorities are informed:				Elaboration for "other" answers and/or any additional comments/clarifications:
	c) How is the application treated?			
Hungary (MEHIB)	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	In-house ad hoc Anti –Bribery Committe (MEHIB) takes necessary measures.
	No fixed policy.			
	Other			
Hungary (Eximbank)	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	The relevant permanent Censorship Committee (Eximbank) takes necessary measures.
	No fixed policy.			
	Other			
Italy	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Japan (JBIC)	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Japan (NEXI)	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Korea (Eximbank)	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Korea (KEIC)	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Luxembourg	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Mexico	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.			
	No fixed policy.			
	Other			
Netherlands	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.			
	No fixed policy.			
	Other			
New Zealand	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	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 13 (continued):

If investigative authorities are informed:	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 review by law enforcement authorities.	X	always	In case GIEK becomes aware of the credible evidence support would not be provided and the enhanced due diligence is launched. However, the support might be reconsidered after the verification process, if there is no proof of bribery involved.
	No fixed policy.			
	Other			
Poland	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Portugal	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Slovak Republic	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Spain	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Sweden	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Switzerland	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
Turkey	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
United Kingdom	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
United States (EXIM)	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	
	No fixed policy.			
	Other			
United States (USDA)	The approval of the application is suspended pending the outcome of the review by law enforcement authorities.	X	always	See comments under Question 12 b)
	No fixed policy.			
	Other			