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

Question 11:

If, **before** credit, cover or other support has been approved, you become aware that an exporter/applicant (or anyone acting on their behalf in connection with the transaction) **has been convicted in a national court or has been subject to equivalent national administrative measures for violation of laws against bribery of foreign public officials of any country within a five-year period**, what actions are taken?				Elaboration for "other" answers and/or any additional comments/clarifications:
Australia	Enhanced due diligence is undertaken	X	always	Refer comments under Question 9.
	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	
	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	
	Other			
Hungary (MEHIB)	Enhanced due diligence is undertaken	X	always	
	Other			
Hungary (Eximbank)	Enhanced due diligence is undertaken	X	always	
	Other			
Israel	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 (K-sure)	Enhanced due diligence is undertaken	X	always	
	Other			
Luxembourg	Enhanced due diligence is undertaken	X	always	
	Other			
Mexico	Enhanced due diligence is undertaken			If Bancomext becomes aware that an applicant has been convicted in a national court, the application for credit or support is cancelled.
	Other	X	always	
Netherlands	Enhanced due diligence is undertaken	X	always	
	Other			
New Zealand	Enhanced due diligence is undertaken	X	always	Similar process as for Question 9.
	Other			

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

Question 11:

If, **before** credit, cover or other support has been approved, you become aware that an exporter/applicant (or anyone acting on their behalf in connection with the transaction) **has been convicted in a national court or has been subject to equivalent national administrative measures for violation of laws against bribery of foreign public officials of any country within a five-year period**, what actions are taken?				Elaboration for "other" answers and/or any additional comments/clarifications:
Norway	Enhanced due diligence is undertaken	X	always	
	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	
	Other			
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	Pending the results of enhanced due diligence, the applicant may be disqualified from program participation in accordance with CCC regulation 1493.30 (d) by being placed under suspension or debarment: (d) Ineligibility for program participation. An applicant may be ineligible to participate in the GSM-102 or GSM-103 programs if: (1) Such applicant is currently debarred, suspended, or proposed for debarment from contracting with or participating in any program administered by a U.S. Government agency; or (2) Such applicant is controlled or can be controlled, in whole or in part, by any individuals or entities currently debarred, suspended or proposed for debarment from contracting with or participating in programs administered by any U.S. Government agency.
	Other	X	always	

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

Question 11 (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, always	Yes, always	
Germany	Yes, always	Yes, always	
Greece	Yes, always	Yes, always	
Hungary (MEHIB)	Yes, always	Yes, always	
Hungary (Eximbank)	Yes, always	Yes, always	
Israel	Yes, sometimes	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 (K-sure)	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	
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, sometimes	

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

Question 11 (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	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			
Hungary (MEHIB)	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	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 enhanced due diligence process.	X	always	The relevant permanent Censorship Committee (Eximbank) takes necessary measures.
	No fixed policy.			
	Other			
Israel	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	a) As of July 2011, verification that the exporter/applicant has in place appropriate management control systems that combat bribery will be performed always by Ashra, as part of the enhanced due diligence.
	No fixed policy.			
	Other			

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

Question 11 (continued):

If enhanced due diligence is undertaken (continued):	c) 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.	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 (K-sure)	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	
	No fixed policy.			
	Other			
Norway	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
	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	We would require further details about the circumstances of the case and ask for information on the corrective measures undertaken by the exporter to avoid such situations in the future (e.g if the person responsible convicted has been replaced, internal control systems are in place).
	No fixed policy.			
	Other			

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

Question 11 (continued):

If enhanced due diligence is undertaken (continued):	c) How is the application treated?			Elaboration for "other" answers and/or any additional comments/clarifications:
Slovak Republic	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	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			
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	
	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	If an application is received, it is placed on hold, pending the outcome of the enhanced due diligence process. Any subsequent recommendation for the party/parties to be placed on the suspension or debarment list would provide the reasons for this recommendation and the party would be afforded the opportunity to dispute the findings and demonstrate to USDA that it has taken the necessary steps to comply with the program regulations.
	No fixed policy.			
	Other			