Section I: General Measures to Deter Bribery

Question 7:

Do you require that details be provided in respect of agents' commissions associated with the transaction?		If yes: a) Do you require the **amounts** of commissions to be disclosed?	If yes, the amounts of commissions must be disclosed:		Elaboration for "other" answers and/or any additional comments/clarifications:
Australia	Yes, always	Yes, always	at the time of application	X	At a minimum, the exporter is asked to provide at the outset the names of the agents employed and the amount of commissions paid to these agents in relation to an export contract/project requiring EFIC support. EFIC can, at its discretion, require additional information as part of its due diligence process in evaluating an application and where there are concerns about the amount paid or payable to these agents. The details EFIC may require include the specific purpose of the payment, the work to be undertaken by the agent and also a copy of the agency agreement. When a transaction has been underwritten, the exporter is required to provide a written declaration prior to each drawdown of any other payments or incentives given to a third party (including those payments previously declared to EFIC)detailing the amount, purpose and recipient of said payments.
			before the final decision to provide support is made	X	
			before a claim will be indemnified		
			other		
Austria	Yes, always	Yes, always	at the time of application	X	
			before the final decision to provide support is made		
			before a claim will be indemnified	X	
			other		
Belgium	No		at the time of application		However, Belgium is currently examining the possible impact of examining commission details on the obligation to cover them.
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other		
Canada	Yes, sometimes	Yes, always	at the time of application		Details would be required if there is reason to believe bribery may have been involved in the transaction. Exporters/ applicants, through the declaration, agree to disclose details upon EDC's request for such. Where the level of commission is inconsistent with industry/business practice and the scope of the agents' responsibilities/role, EDC will not provide support unless further information/details are provided and it is otherwise satisfied. In all such situations, EDC would always undertake the measures set out in Q7 a), b), c) and d).
			before the final decision to provide support is made	X	
			before a claim will be indemnified	X	
			other		
Czech Republic (EGAP)	Yes, sometimes	Yes, sometimes	at the time of application		As a part of enhanced due diligence.
			before the final decision to provide support is made	X	
			before a claim will be indemnified		
			other		
Czech Republic (CEB)	Yes, sometimes	Yes, sometimes	at the time of application		In case of enhanced due diligence
			before the final decision to provide support is made	X	
			before a claim will be indemnified		
			other		
Denmark	Yes, always	Yes, always	at the time of application		EKF is considering whether to include this in the application form.
			before the final decision to provide support is made	X	
			before a claim will be indemnified		
			other		

Section I: General Measures to Deter Bribery

Question 7:

Do you require that details be provided in respect of agents' commissions associated with the transaction?		If yes: a) Do you require the **amounts** of commissions to be disclosed?	If yes, the amounts of commissions must be disclosed:		Elaboration for "other" answers and/or any additional comments/clarifications:
Finland	Yes, always	Yes, always	at the time of application		
			before the final decision to provide support is made	X	
			before a claim will be indemnified		
			other		
France	Yes, sometimes	Yes, sometimes	at the time of application	X	
			before the final decision to provide support is made	X	
			before a claim will be indemnified	X	
			other		
Germany	Yes, sometimes	Yes, sometimes	at the time of application		
			before the final decision to provide support is made	X	
			before a claim will be indemnified	X	
			other		
Greece	Yes, always	Yes, always	at the time of application		
			before the final decision to provide support is made	X	
			before a claim will be indemnified		
			other		
Hungary (MEHIB)	Yes, always	Yes, always	at the time of application	X	
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other		
Hungary (Eximbank)	Yes, always	Yes, always	at the time of application	X	
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other		
Israel	Yes, always	Yes, always	at the time of application	X	
			before the final decision to provide support is made	X	
			before a claim will be indemnified		
			other		
Italy	Yes, always	Yes, always	at the time of application	X	
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other		
Japan (JBIC)	Yes, sometimes	Yes, sometimes	at the time of application		Anytime when deemed necessary.
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other	X	
Japan (NEXI)	Yes, sometimes	Yes, sometimes	at the time of application		case by case basis
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other	X	
Korea (Eximbank)	Yes, sometimes	Yes, always	at the time of application	X	
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other		
Korea (K-sure)	Yes, sometimes	Yes, sometimes	at the time of application		It depends on cases.
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other	X	

Section I: General Measures to Deter Bribery

Question 7:

Do you require that details be provided in respect of agents' commissions associated with the transaction?		If yes: a) Do you require the **amounts** of commissions to be disclosed?	If yes, the amounts of commissions must be disclosed:		Elaboration for "other" answers and/or any additional comments/clarifications:
Luxembourg	Yes, sometimes	Yes, always	at the time of application		We only request details in respect of agents' commissions in case of compensation. We sometimes require the amount of agents' commissions to be disclosed at the time of application in case of suspicion of bribery.
			before the final decision to provide support is made		
			before a claim will be indemnified	X	
			other	X	
Mexico	No		at the time of application		
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other		
Netherlands	Yes, always	Yes, always	at the time of application	X	
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other		
New Zealand	Yes, always	Yes, always	at the time of application		
			before the final decision to provide support is made	X	
			before a claim will be indemnified		
			other		
Norway	Yes, always	Yes, always	at the time of application	X	
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other		
Poland	Yes, sometimes	Yes, sometimes	at the time of application		
			before the final decision to provide support is made	X	
			before a claim will be indemnified		
			other		
Portugal	Yes, always	Yes, always	at the time of application	X	
			before the final decision to provide support is made	X	
			before a claim will be indemnified		
			other		
Slovak Republic	Yes, sometimes	Yes, sometimes	at the time of application		Details would be required on a case by case basis if there is a suspicion of bribery. Exporter in written declares that he is prepared to disclose, upon demand of EXIMBANKA SR the identity of persons acting on our behalf in connection with the transaction, which is subject to state support, as well as the amount and purpose of commissions and fees paid, or agreed to be paid, to such persons.
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other	X	
Spain	Yes, always	Yes, always	at the time of application	X	The exporter has to disclose the amount of the commission and whether it is paid in Spain or abroad. On an exceptional basis, we may require additional information.
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other		
Sweden	Yes, always	Yes, always	at the time of application	X	
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other		
Switzerland	Yes, sometimes	Yes, sometimes	at the time of application		
			before the final decision to provide support is made	X	
			before a claim will be indemnified	X	
			other		

Section I: General Measures to Deter Bribery

Question 7:

	Do you require that details be provided in respect of agents' commissions associated with the transaction?	If yes: a) Do you require the **amounts** of commissions to be disclosed?	If yes, the amounts of commissions must be disclosed:		Elaboration for "other" answers and/or any additional comments/clarifications:
Turkey	Yes, sometimes	Yes, sometimes	at the time of application		
			before the final decision to provide support is made	X	
			before a claim will be indemnified	X	
			other		
United Kingdom	Yes, always	Yes, always	at the time of application	X	
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other		
United States (EXIM)	Yes, sometimes	Yes, sometimes	at the time of application		Exporters are required to disclose on the Exporter's Certificate, prior to approval of disbursements, any fees or arrangements that are not regular commissions or fees to regular sales agents, brokers or representatives or that are not readily identifiable on the exporter's books and records as to amount and purpose. Exporters also are required to provide information regarding the recipient of any such commission. In addition to these programmatic requirements, Ex-Im Bank fairly routinely inquires about commissions in specific cases. For example, Ex-Im Bank reviews the price reasonableness of all long-term and medium-term transactions, which assists in determining whether the cost of administrative fees or commissions is reflected in the amount of support requested from Ex-Im Bank. Ex-Im Bank may review the appropriateness of supporting commissions at a number of points during the course of a transaction, including pre-authorization, pre-disbursement, and claims evaluation, and may request additional information regarding the amount, level and purpose of such commission as part of such review. In addition, Ex-Im Bank may seek information about commissions as part of its inquiry into how a transaction was originated, in order to assess the creditworthiness of the transaction.
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other	X	
United States (USDA)	No	No	at the time of application		
			before the final decision to provide support is made		
			before a claim will be indemnified		
			other		

Section I: General Measures to Deter Bribery

Question 7 (continued):

b) Do you assess whether the **level** of commissions is consistent with standard business practice?		If yes, assessment is made:		Elaboration for "other" answers and/or any additional comments/clarifications:
Australia	Yes, always	at the time of application	X	Refer to responses and comments to Question 6 and Question 7(a).
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Austria	Yes, always	at the time of application	X	
		before the final decision to provide support is made		
		before a claim will be indemnified	X	
		other		
Belgium	Yes, sometimes	at the time of application		Assessment on a case by case basis. if there are indications, the due diligence procedure takes place
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
Canada	Yes, always	at the time of application		Refer to comment in Q7 a).
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		
Czech Republic (EGAP)	Yes, sometimes	at the time of application		As a part of enhanced due diligence.
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Czech Republic (CEB)	Yes, sometimes	at the time of application		In case of enhanced due diligence
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Denmark	Yes, always	at the time of application		EKF is considering whether to include this in the application form
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Finland	Yes, always	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
France	Yes, sometimes	at the time of application	X	
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		
Germany	Yes, sometimes	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		
Greece	No	at the time of application		
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		

Section I: General Measures to Deter Bribery

Question 7 (continued):

b) Do you assess whether the **level** of commissions is consistent with standard business practice?		If yes, assessment is made:		Elaboration for "other" answers and/or any additional comments/clarifications:
Hungary (MEHIB)	Yes, sometimes	at the time of application	X	The assessment is made on a case by case basis.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Hungary (Eximbank)	Yes, sometimes	at the time of application	X	The assessment is made on a case by case basis.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Israel	Yes, sometimes	at the time of application	X	
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Italy	Yes, always	at the time of application	X	
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Japan (JBIC)	No	at the time of application		
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Japan (NEXI)	No	at the time of application		
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Korea (Eximbank)	Yes, sometimes	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Korea (K-sure)	Yes, sometimes	at the time of application		It depends on cases.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
Luxembourg	Yes, sometimes	at the time of application	X	We always assess whether the level of commissions is consistent with standard business practice before a claim will be indemnified. We sometimes assess whether the level of commissions is consistent with standard business practice at the time of application.
		before the final decision to provide support is made		
		before a claim will be indemnified	X	
		other		
Mexico		at the time of application		
Netherlands	Yes, always	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		

Section I: General Measures to Deter Bribery

Question 7 (continued):

b) Do you assess whether the **level** of commissions is consistent with standard business practice?		If yes, assessment is made:		Elaboration for "other" answers and/or any additional comments/clarifications:
New Zealand	Yes, sometimes	at the time of application		Where the amount in (a) appears excessive
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other	X	
Norway	Yes, always	at the time of application	X	
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Poland	Yes, sometimes	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Portugal	Yes, always	at the time of application	X	
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Slovak Republic	Yes, sometimes	at the time of application		Assessment would be provided on a case by case basis.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
Spain	Yes, sometimes	at the time of application		We would ask for more detailed information about the agents' commissions in case we observe discrepancies in the figures submitted to us, but not as a general rule in the application form.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Sweden	Yes, sometimes	at the time of application		If the level of the commission is significant due to the size of the contract, EKN tries to find out whether there is standard business practice. However, EKN has found it difficult to find out whether there is a standard for a particular transaction. EKN has contacted both relevant interest organisations as well as NGOs for that purpose. None of them had any information on standard practice.
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Switzerland	Yes, sometimes	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		

Section I: General Measures to Deter Bribery

Question 7 (continued):

b) Do you assess whether the **level** of commissions is consistent with standard business practice?		If yes, assessment is made:		Elaboration for "other" answers and/or any additional comments/clarifications:
Turkey	Yes, sometimes	at the time of application		We would like to clarify that Turkey never gives cover or finances the agent's commissions under its programs. However, "expenses" as a breakdown item of the contract is always scrutinized. For small-value-short terms transactions which do not include any "services" or "expenses" item, Turk Eximbank always makes the disbursements against the customs documentations which does not leave any unidentified portion in the costs. In the case of higher volume- medium-long term transactions, we always require the exporter give explanation on every item of costs breakdown. As a result, Turkey's "undertaking review of the agents' commissions in certain circumstances" mentioned in the footnote refers to the scrutiny of the costs breakdown and the right of loan officers to ask all the details of a contract.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
United Kingdom	Yes, always	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
United States (EXIM)	Yes, sometimes	at the time of application		See Question 7 a) for discussion of the "reasonableness" of fees.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
United States (USDA)	No	at the time of application		
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		

Section I: General Measures to Deter Bribery

Question 7 (continued):

c) Do you require the **purpose** of commissions to be clearly identified?		If yes, the purpose is identified:		Elaboration for "other" answers and/or any additional comments/clarifications:
Australia	Yes, sometimes	at the time of application	X	Refer to responses and comments to Question 7(a).
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Austria	Yes, sometimes	at the time of application		Details would be required if the commission exceeded a size which is not customary within the industry or business or if there is reason to suspect.
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		
Belgium		at the time of application		
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Canada	Yes, always	at the time of application		Refer to comment in Q7 a).
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		
Czech Republic (EGAP)	Yes, sometimes	at the time of application		As a part of enhanced due diligence.
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Czech Republic (CEB)	Yes, sometimes	at the time of application		In case of enhanced due diligence
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Denmark	Yes, always	at the time of application		EKF is considering whether to include this in the application form
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Finland	Yes, sometimes	at the time of application		Details would be required on a case by case basis if there is a reason to suspect misconduct.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
France	Yes, sometimes	at the time of application	X	
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		
Germany	Yes, sometimes	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		

Section I: General Measures to Deter Bribery

Question 7 (continued):

c) Do you require the **purpose** of commissions to be clearly identified?		If yes, the purpose is identified:		Elaboration for "other" answers and/or any additional comments/clarifications:
Greece	No	at the time of application		
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Hungary (MEHIB)	Yes, always	at the time of application	X	Data are required on the application form.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Hungary (Eximbank)	Yes, always	at the time of application	X	Data are required on the application form.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Israel	Yes, always	at the time of application	X	
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Italy	Yes, sometimes	at the time of application	X	We ask the purpose in case the amount is clearly exceeding business practices and in case of n enhanced due diligence.
		before the final decision to provide support is made		
		before a claim will be indemnified	X	
		other		
Japan (JBIC)	Yes, sometimes	at the time of application		Anytime when deemed necessary.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
Japan (NEXI)	Yes, sometimes	at the time of application		case by case basis
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
Korea (Eximbank)	Yes, always	at the time of application	X	
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Korea (K-sure)	Yes, sometimes	at the time of application		It depends on cases.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
Luxembourg	Yes, always	at the time of application		
		before the final decision to provide support is made		
		before a claim will be indemnified	X	
		other		
Mexico		at the time of application		
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		

Section I: General Measures to Deter Bribery

Question 7 (continued):

c) Do you require the **purpose** of commissions to be clearly identified?		If yes, the purpose is identified:		Elaboration for "other" answers and/or any additional comments/clarifications:
Netherlands	Yes, always	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
New Zealand	Yes, always	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Norway	Yes, always	at the time of application	X	
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Poland	Yes, sometimes	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Portugal	Yes, sometimes	at the time of application		When they exceed the usual standard according to business practice, a full explanation is required and it may trigger an enhanced due diligence procedure. Ultimately, the Guardian Authorities may decide to deny cover for such amounts.
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Slovak Republic	Yes, sometimes	at the time of application		On case by case basis if there is a suspicion of bribery. Exporter in written declares that he is prepared to disclose, upon demand of EXIMBANKA SR the identity of persons acting on our behalf in connection with the transaction, which is subject to state support, as well as the amount and purpose of commissions and fees paid, or agreed to be paid, to such persons.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
Spain	Yes, sometimes	at the time of application		See Question 7 b). We do not require such information systematically. We would if we detected any irregularity in the figures.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
Sweden	Yes, always	at the time of application	X	
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Switzerland	Yes, sometimes	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		

Section I: General Measures to Deter Bribery

Question 7 (continued):

c) Do you require the **purpose** of commissions to be clearly identified?		If yes, the purpose is identified:		Elaboration for "other" answers and/or any additional comments/clarifications:
Turkey	Yes, sometimes	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		
United Kingdom	Yes, always	at the time of application	X	
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
United States (EXIM)	Yes, sometimes	at the time of application		As indicated above, the purpose of any commission is expected to be readily identifiable on the exporter's books. Otherwise, the commission must be specifically disclosed on the exporter's certificate.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
United States (USDA)	No	at the time of application		
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		

Section I: General Measures to Deter Bribery

Question 7 (continued):

d) Do you require that details (e.g. name, company, address) be provided in respect of the **agent(s)** to whom commissions are paid?		If yes, assessment is made:		Elaboration for "other" answers and/or any additional comments/clarifications:
Australia	Yes, always	at the time of application	X	Refer to responses and comments to Question 6 and Question 7(a).
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Austria	Yes, sometimes	at the time of application		Details would be required if the commission exceeded a size which is not customary within the industry or business or if there is reason to suspect.
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		
Belgium		at the time of application		
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Canada	Yes, always	at the time of application		Refer to comment in Q7 a).
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		
Czech Republic (EGAP)	Yes, sometimes	at the time of application		As a part of enhanced due diligence.
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Czech Republic (CEB)	Yes, sometimes	at the time of application		In case of enhanced due diligence
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Denmark	Yes, sometimes	at the time of application		It depends on level and/or purpose of the commission.
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Finland	Yes, always	at the time of application		Details would be required on a case by case basis if there is a reason to suspect misconduct. The exporter is liable to provide additional information specified in Questions 7 a)~d) upon request.
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		

Section I: General Measures to Deter Bribery

Question 7 (continued):

d) Do you require that details (e.g. name, company, address) be provided in respect of the **agent(s)** to whom commissions are paid?		If yes, assessment is made:		Elaboration for "other" answers and/or any additional comments/clarifications:
France	Yes, sometimes	at the time of application	X	Précisions sur les montants, l'objet des commissions, les agents, dans les cas suivants : - Si l'exportateur/ investisseur/ banque/demandeur figure sur la liste d'exclusion des IFI, - Si l'exportateur/ investisseur/ banque/demandeur a fait l'objet d'une condamnation passée ou fait l'objet d'une procédure en cours pour faits de corruption -Si des éléments permettent de détecter des indices de corruption Formulaire de demande d'assurance crédit Le demandeur s'engage, sur demande de la Compagnie, à fournir tout renseignement sur l'identité des personnes agissant pour son compte dans le cadre de l'opération faisant l'objet de la demande ainsi que sur le montant et l'objet des commissions et/ou rémunérations qui leur auraient ou devraient leur être versées Lettre d'engagement L'assuré reconnait que la Compagnie aura le droit de lui demander tout renseignement sur l'identité des personnes agissant pour son compte dans le cadre du contrat d'exportation ainsi que, le cas échéant, sur le montant et l'objet des commissions et/ou rémunérations qui leur auraient ou devraient leur être versées. Dispositions prévues dans les Conditions Générales des polices (Art. 25 Contrôle) La Compagnie se réserve également le droit de demander à l'Assuré tout renseignement sur l'identité des personnes agissant pour son compte dans le cadre du contrat garanti ainsi que, le cas échéant, sur le montant et l'objet des commissions et/ou rémunérations qui leur auraient ou devraient leur être versées
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		

Section I: General Measures to Deter Bribery

Question 7 (continued):

d) Do you require that details (e.g. name, company, address) be provided in respect of the **agent(s)** to whom commissions are paid?		If yes, assessment is made:		Elaboration for "other" answers and/or any additional comments/clarifications:
Germany	Yes, sometimes	at the time of application		EH requires details to be provided in case there is a reason to suspect. A reason to suspect is for example supposed whenever an exporter is listed on the publicly available debarment list or in case we have been informed that the exporter or anyone acting on behalf of the exporter is currently under charge in a national court or within a five year period preceding has been convicted in a national court or has been subject to equivalent administrative measures for violation of laws against bribery. Regarding the level of commission we try to find out whether there is a standard business practice.
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		
Greece	Yes, always	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Hungary (MEHIB)	Yes, always	at the time of application	X	Data are required on the application form.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Hungary (Eximbank)	Yes, always	at the time of application	X	Data are required on the application form.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Israel	Yes, always	at the time of application	X	
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Italy	Yes, sometimes	at the time of application	X	We ask further details only in case of enhanced due diligence.
		before the final decision to provide support is made		
		before a claim will be indemnified	X	
		other		
Japan (JBIC)	Yes, sometimes	at the time of application		Anytime when deemed necessary.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
Japan (NEXI)	Yes, sometimes	at the time of application		case by case basis
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
Korea (Eximbank)	Yes, always	at the time of application	X	
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Korea (K-sure)	Yes, sometimes	at the time of application		It depends on cases.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
Luxembourg	Yes, always	at the time of application		
		before the final decision to provide support is made		
		before a claim will be indemnified	X	
		other		

Section I: General Measures to Deter Bribery

Question 7 (continued):

d) Do you require that details (e.g. name, company, address) be provided in respect of the **agent(s)** to whom commissions are paid?		If yes, assessment is made:		Elaboration for "other" answers and/or any additional comments/clarifications:
Mexico		at the time of application		
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Netherlands	Yes, always	at the time of application	X	
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
New Zealand	Yes, always	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Norway	Yes, always	at the time of application	X	In the application form/the Exporters Corruption Declaration, the applicant/exporter must give information on agents including; name, nature of the assignment/service, remuneration/fees/other benefits and payment/settlement location.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Poland	Yes, sometimes	at the time of application		Declaration submitted by exporter as a part of an application for cover includes a provision that upon demand the exporter will reveal the identity of persons acting on his behalf in connection with the export contract, and the amount and purpose of commissions and fees paid, or agreed to be paid, to such persons.
		before the final decision to provide support is made	X	
		before a claim will be indemnified		
		other		
Portugal	Yes, sometimes	at the time of application		COSEC requires details whenever there is any reason to suspect. For instance, the name of the exporter is included in a debarment list, conviction by national court or legal proceedings against the exporter on the basis of an accusation of bribery, etc.
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		
Slovak Republic	Yes, sometimes	at the time of application		Details would be required on a case by case basis. Exporter in written declares that he is prepared to disclose, upon demand of EXIMBANKA SR the identity of persons acting on our behalf in connection with the transaction, which is subject to state support, as well as the amount and purpose of commissions and fees paid, or agreed to be paid, to such persons.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
Spain	Yes, sometimes	at the time of application		See Question 7 b).
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
Sweden	Yes, always	at the time of application	X	
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		

Section I: General Measures to Deter Bribery

Question 7 (continued):

d) Do you require that details (e.g. name, company, address) be provided in respect of the **agent(s)** to whom commissions are paid?		If yes, assessment is made:		Elaboration for "other" answers and/or any additional comments/clarifications:
Switzerland	Yes, sometimes	at the time of application		
		before the final decision to provide support is made	X	
		before a claim will be indemnified	X	
		other		
Turkey	Yes, sometimes	at the time of application		Although Turk Eximbank is off-cover for the agents' commissions, we scrutinize the details of any types of commissions in the contracts. In case we detect an agent's commission, we exclude it from the cover. We would like to clarify that Turkey never gives cover or finances the agent's commissions under its programs. However, "expenses" as a breakdown item of the contract is always scrutinized. For small-value-short terms transactions which do not include any "services" or "expenses" item, Turk Eximbank always makes the disbursements against the customs documentations which does not leave any unidentified portion in the costs. In the case of higher volume- medium-long term transactions, we always require the exporter give explanation on every item of costs breakdown. As a result, Turkey's "undertaking review of the agents' commissions in certain circumstances" mentioned in the footnote refers to the scrutiny of the costs breakdown and the right of loan officers to ask all the details of a contract.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
United Kingdom	Yes, always	at the time of application	X	
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		
United States (EXIM)	Yes, sometimes	at the time of application		Whether or not financed by Ex-Im Bank, exporters are required to disclose on the Exporter's Certificate, prior to approval of disbursements, any fees or arrangements that are not regular commissions or fees to regular sales agents, brokers or representatives or that are not readily identifiable on the exporter's books and records as to amount and purpose. With respect to any such commission, the exporter will be required to provide information regarding the identity of the agent.
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other	X	
United States (USDA)	No	at the time of application		
		before the final decision to provide support is made		
		before a claim will be indemnified		
		other		

Section I: Measures to Deter Bribery

Question 7 (continued):

Please describe any additional measures taken in relation to the collection of information on and/or review of agens' commissions:	
Australia	
Austria	
Belgium	
Canada	
Czech Republic (EGAP)	
Czech Republic (CEB)	
Denmark	
Finland	
France	
Germany	
Greece	
Hungary (MEHIB)	
Hungary (Eximbank)	
Israel	
Italy	
Japan (JBIC)	
Japan (NEXI)	
Korea (Eximbank)	
Korea (K-sure)	
Luxembourg	
Mexico	
Netherlands	
New Zealand	

Section I: Measures to Deter Bribery

Question 7 (continued):

Please describe any additional measures taken in relation to the collection of information on and/or review of agens' commissions:	
Norway	GIEK has internal rules of procedure as to how to proceed with information which gives reason for further investigations. The officer in charge has a list of elements to consider, e.g. the relative size of an agent fee and if the place of payment differs from the place where the actual work is performed.
Poland	
Portugal	
Slovak Republic	
Spain	
Sweden	
Switzerland	SERV requires this information before the final decision to provide support is made or before a claim will be indemnified only in case if the enhanced due diligence process is invoked.
Turkey	
United Kingdom	We require the applicant to specify the country or countries where any commission, fees or other remuneration is/are payable to any Agent. ECGD has the right to audit the records of the exporter that relate specifically to the obtaining of the supply contract to be supported by ECGD to the extent necessary to verify the accuracy of the information given by the supplier in its application concerning agent's details and adherence to the supplier's code of conduct.
United States (EXIM)	
United States (USDA)	