Section VI: Further Measures

Question 22:

Are you considering any further general measures to deter bribery and/or changes to your policies and practices described in the survey?		Comments on measures and/or actions under consideration:
Australia	No	Updates were made to EFIC's procedures in July 2012. EFIC's responses to this survey reflect the revisions to these procedures.
Austria	Yes	In the light of our experience we will adjust our policies and practices as appropriate.
Belgium	Yes	The underwriting department will be trained to deter bribery by official authorities.
Canada	No	
Czech Republic (EGAP)	Yes	We consider to utilize experience of other ECAs.
Czech Republic (CEB)	No	
Denmark	No	
Finland	No	
France	No	
Germany	No	In January 2008 we had a lecture for the staff by a Transparency International Board Member on the question of bribery and export finance. Together with the relaunch of the declaration provided to the applicants and the relaunch of our website in may 2008 we created a special site "Korruptionsprävention" http://www.agaportal.de/pages/aga/nachhaltigkeit/korruption.html); an English version, "prevention of bribery" is also available under http://www.agaportal.de/en/aga/nachhaltigkeit/korruption.html. After this no further activities are planned for the near future.
Greece	No	There is no consideration for further measures.
Hungary (MEHIB)	Yes	In line with international developments and experience
Hungary (Eximbank)	Yes	In line with international developments and experience
Israel	Yes	Please see our comments above in relevant clauses relating to implementation of further measures as of July 2011.
Italy	Yes	During 2008, the Code of Ethics and the Organisation Model for the prevention of crime according to legislative decree 231/2001, the two "pillars" of SACE's preventing policy were updated and applied to all SACE Group companies. The Model includes a detailed risk assessment on each activity of SACE and a matrix between risks and control procedures.
Japan (JBIC)	No	It is important to, first of all, gain some experience on the newly implemented policies and practices.
Japan (NEXI)	No	
Korea (Eximbank)	No	

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Korea (K-sure)	No	
Luxembourg	Yes	Training of employees will take place on an ongoing basis of ONDD and ODL.
Mexico	No	
Netherlands	Yes	Atradius DSB will foster the awareness of its personnel every year.
New Zealand	Yes	Increasing the level of information on the NZECO website and material provided to exporters.
Norway	Yes	The internal rules of procedure may be further developed as we gain experience.
Poland	No	
Portugal	Yes	The underwriting department dealing with transactions to be covered on behalf of the Portuguese State will be trained to become more aware of bribery crimes and how to deal with the requirements of the new Recommendation. Upgrading of publication on our official website.
Slovak Republic	No	
Spain	No	
Sweden	Yes	EKN intends to insert a link on its website to www.business-anti-corruption.com
Switzerland	Yes	SERV is having a regular exchange with Transparency International Switzerland on the subject of bribery. The underwriting department is trained on compliance issues on a regular basis.
Turkey	No	
United Kingdom	Yes	ECGD has an active programme of training its staff. ECGD is currently developing a tool kit to help it assess an applicant's policies taking account of the new British Standard BS10500 - Specification for an anti-bribery management system.
United States (EXIM)	No	In August 2007, an Office of the Inspector General was established and fully staffed with special agents prepared and capable of investigating allegations of bribery and corruption and referring such matter to the Department of Justice for prosecution. Furthermore, Ex-Im Bank has prepared "Transaction Due Diligence Guidelines" that addresses corruption generally in order to provide guidance to its applicants, lenders and project participants on such matters. At this time, no further steps have been taken.

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United States (USDA)	Yes	□ Inform exporter of consequences of bribery and encourage them to implement internal controls to prevent bribery ► Possible Solution: Issue notice to participants. □ Develop a more detailed written policy on how we report bribery (i.e. document our current practice of using Compliance Review Staff, OIG, Justice, etc. to deal with program issues). ► Possible Solution: Document our current policy on how we deal with suspected fraud in the Procedure Handbook. □ Check or require exporter to certify that the exporter is not listed on the following publicly available debarment lists: World Bank, African Development Bank, Asian Development Bank, EBRD and IADB. ► Possible Solution: Add to the certifications initially required in the exporter qualification. Explore whether this will require a regulatory change. Explore alternative to a regulatory change (for example, is it feasible to check these listings ourselves, and how often would we need to do it)? □ Certification on Foreign Corrupt Practices Act: ► Solution: Our current certification that the transaction complies with applicable U.S. Law (1493.50(b) and 1493.90(d) appears to be sufficient. A possible clarification in a notice to participants could be provided.