Section IV: Past Experience

Question 17:

Please indicate by marking the appropriate boxes if you have had any experience with the following scenarios related to the time **before** credit, cover or other support has been approved:		You became aware or have reason to believe that					
		an exporter/ applicant was on one of the debarment lists that you verify, and…	an exporter/ applicant was under charge in a national court for bribery, and…	an exporter/ applicant had been convicted in a national court or had been subject to equivalent national administrative measures for bribery, and…	bribery may be involved in the transaction (e.g. press reports from a reputable source, information provided by participants in the transaction), and…	You became aware of credible evidence that bribery was involved in the award of the export contract for a transaction, and…	Elaboration for "other" answers and/or any additional comments/ clarifications:
Australia	you notified law enforcement authorities.						For legal reasons, it would not be appropriate to publish this information in the event that we had experienced any of the scenarios above.
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Austria	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Belgium	you notified law enforcement authorities.						
	you undertook enhanced due diligence.				X		
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Canada	you notified law enforcement authorities.						
	you undertook enhanced due diligence.	X	X	X	X	X	
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence.	X	X	X	X	X	
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Czech Republic (EGAP)	you notified law enforcement authorities.						No experience
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						

Section IV: Past Experience

Question 17:

Please indicate by marking the appropriate boxes if you have had any experience with the following scenarios related to the time **before** credit, cover or other support has been approved:		You became aware or have reason to believe that					
		an exporter/ applicant was on one of the debarment lists that you verify, and…	an exporter/ applicant was under charge in a national court for bribery, and…	an exporter/ applicant had been convicted in a national court or had been subject to equivalent national administrative measures for bribery, and…	bribery may be involved in the transaction (e.g. press reports from a reputable source, information provided by participants in the transaction), and…	You became aware of credible evidence that bribery was involved in the award of the export contract for a transaction, and…	Elaboration for "other" answers and/or any additional comments/ clarifications:
Czech Republic (CEB)	you notified law enforcement authorities.						No experience
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Denmark	you notified law enforcement authorities.						
	you undertook enhanced due diligence.		X				
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Finland	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
France	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Germany	you notified law enforcement authorities.						
	you undertook enhanced due diligence.		X	X	X		
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence.		X	X	X		
	you suspended approval of the application pending the outcome of the legal process.						
	other						

Section IV: Past Experience

Question 17:

Please indicate by marking the appropriate boxes if you have had any experience with the following scenarios related to the time **before** credit, cover or other support has been approved:		You became aware or have reason to believe that					
		an exporter/ applicant was on one of the debarment lists that you verify, and…	an exporter/ applicant was under charge in a national court for bribery, and…	an exporter/ applicant had been convicted in a national court or had been subject to equivalent national administrative measures for bribery, and…	bribery may be involved in the transaction (e.g. press reports from a reputable source, information provided by participants in the transaction), and…	You became aware of credible evidence that bribery was involved in the award of the export contract for a transaction, and…	Elaboration for "other" answers and/or any additional comments/ clarifications:
Greece	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence process.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Hungary (MEHIB)	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence process.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Hungary (Eximbank)	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence process.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Israel	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.				X		
	you suspended approval of the application pending the outcome of the enhanced due diligence process.				X		
	you suspended approval of the application pending the outcome of the legal process.				X		
	other						
Italy	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence process.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						

Section IV: Past Experience

Question 17:

Please indicate by marking the appropriate boxes if you have had any experience with the following scenarios related to the time **before** credit, cover or other support has been approved:		You became aware or have reason to believe that					
		an exporter/ applicant was on one of the debarment lists that you verify, and…	an exporter/ applicant was under charge in a national court for bribery, and…	an exporter/ applicant had been convicted in a national court or had been subject to equivalent national administrative measures for bribery, and…	bribery may be involved in the transaction (e.g. press reports from a reputable source, information provided by participants in the transaction), and…	You became aware of credible evidence that bribery was involved in the award of the export contract for a transaction, and…	Elaboration for "other" answers and/or any additional comments/ clarifications:
Japan (JBIC)	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Japan (NEXI)	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Korea (Eximbank)	you notified law enforcement authorities.						No experience
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Korea (K-sure)	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Luxembourg	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due diligence.						
	you suspended approval of the application pending the outcome of the legal process.						
	other						

Section IV: Past Experience

Question 17:

Please indicate by marking the appropriate boxes if you have had any experience with the following scenarios related to the time **before** credit, cover or other support has been approved:		You became aware or have reason to believe that					
		an exporter/ applicant was on one of the debarment lists that you verify, and…	an exporter/ applicant was under charge in a national court for bribery, and…	an exporter/ applicant had been convicted in a national court or had been subject to equivalent national administrative measures for bribery, and…	bribery may be involved in the transaction (e.g. press reports from a reputable source, information provided by participants in the transaction), and…	You became aware of credible evidence that bribery was involved in the award of the export contract for a transaction, and…	Elaboration for "other" answers and/or any additional comments/ clarifications:
Mexico	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Netherlands	you notified law enforcement authorities.				X		
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
New Zealand	you notified law enforcement authorities.						The NZECO has had no such experience.
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Norway	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Poland	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due						
	you suspended approval of the application pending the outcome of the legal process.						
	other						

Section IV: Past Experience

Question 17:

Please indicate by marking the appropriate boxes if you have had any experience with the following scenarios related to the time **before** credit, cover or other support has been approved:		You became aware or have reason to believe that					
		an exporter/ applicant was on one of the debarment lists that you verify, and…	an exporter/ applicant was under charge in a national court for bribery, and…	an exporter/ applicant had been convicted in a national court or had been subject to equivalent national administrative measures for bribery, and…	bribery may be involved in the transaction (e.g. press reports from a reputable source, information provided by participants in the transaction), and…	You became aware of credible evidence that bribery was involved in the award of the export contract for a transaction, and…	Elaboration for "other" answers and/or any additional comments/ clarifications:
Portugal	you notified law enforcement authorities.						No experience
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Slovak Republic	you notified law enforcement authorities.						No experience
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Spain	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Sweden	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
Switzerland	you notified law enforcement authorities.						
	you undertook enhanced due diligence.		X	X	X		
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due		X	X	X		
	you suspended approval of the application pending the outcome of the legal process.						
	other						

Section IV: Past Experience

Question 17:

Please indicate by marking the appropriate boxes if you have had any experience with the following scenarios related to the time **before** credit, cover or other support has been approved:		You became aware or have reason to believe that					
		an exporter/ applicant was on one of the debarment lists that you verify, and…	an exporter/ applicant was under charge in a national court for bribery, and…	an exporter/ applicant had been convicted in a national court or had been subject to equivalent national administrative measures for bribery, and…	bribery may be involved in the transaction (e.g. press reports from a reputable source, information provided by participants in the transaction), and…	You became aware of credible evidence that bribery was involved in the award of the export contract for a transaction, and…	Elaboration for "other" answers and/or any additional comments/ clarifications:
Turkey	you notified law enforcement authorities.						
	you undertook enhanced due diligence.						
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due						
	you suspended approval of the application pending the outcome of the legal process.						
	other						
United Kingdom	you notified law enforcement authorities.				X		
	you undertook enhanced due diligence.				X		
	you decided not to provide support for the transaction.						
	you suspended approval of the application pending the outcome of the enhanced due				X		
	you suspended approval of the application pending the outcome of the legal process.						
	other						
United States (EXIM)	you notified law enforcement authorities.						
	you undertook enhanced due diligence.	X	X	X	X		
	you decided not to provide support for the transaction.	X					
	you suspended approval of the application pending the outcome of the enhanced due	X		X	X		
	you suspended approval of the application pending the outcome of the legal process.						
	other						
United States (USDA)	you notified law enforcement authorities.						
	you undertook enhanced due diligence.	X					
	you decided not to provide support for the transaction.	X					
	you suspended approval of the application pending the outcome of the enhanced due	X					
	you suspended approval of the application pending the outcome of the legal process.						
	other						

Section IV: Past Experience

Question 17 (continued):

Please describe the circumstances of the actual incidents noted in the preceding table. Please also provide information on any actions that were taken as a result of situations not listed in the table (e.g. Members who review the details of agents' commissions as part of the standard application process should provide information on any actions that were taken as a result of the review of commissions).	
Australia	
Austria	
Belgium	A mother company located abroad has been accused of bribery abroad. The Belgian subsidiary company has been asked to explain their Management Control Systems.
Canada	
Czech Republic (EGAP)	
Czech Republic (CEB)	
Denmark	A board member and shareholder of the buyer was under charge of bribery for offering a New Years present to a public official. It was a big court case including many other people. We contacted a local lawyer and obtained a legal opinion in order to ensure, inter alia, that there was no link between the transaction and the court case.
Finland	
France	
Germany	
Greece	
Hungary (MEHIB)	
Hungary (Eximbank)	
Israel	
Italy	
Japan (JBIC)	
Japan (NEXI)	
Korea (Eximbank)	
Korea (K-sure)	
Luxembourg	
Mexico	
Netherlands	

Section IV: Past Experience

Question 17 (continued):

Please describe the circumstances of the actual incidents noted in the preceding table. Please also provide information on any actions that were taken as a result of situations not listed in the table (e.g. Members who review the details of agents' commissions as part of the standard application process should provide information on any actions that were taken as a result of the review of commissions).	
New Zealand	
Norway	
Poland	
Portugal	
Slovak Republic	
Spain	
Sweden	
Switzerland	
Turkey	
United Kingdom	
United States (EXIM)	
United States (USDA)	