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

Question 12:

If, **before** credit, cover or other support has been approved, you have reason to believe that **bribery may be involved in the transaction** (e.g. press reports from a reputable source, information provided by participants in the transaction) related to the award of the export contract, what action(s) are taken?				Elaboration for "other" answers and/or any additional comments/clarifications:
Australia	Enhanced due diligence is undertaken	X	always	
	Other			
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	Procédure de contrôle approfondi déclenchée si, par exemple : - Montant du contrat manifestement surévalué - Montant manifestement trop élevé d'un poste du contrat - Service après vente déclaré - Contrat d'agent déclaré - Contrat passé de gré à gré avec un acheteur public - Contrat avec un co-traitant ou sous-traitant local lorsque le montant de sa part semble disproportionné - Contrat comportant l'intervention de sociétés écran notamment sises dan des paradis fiscaux (hors credit bail pour les financements d'actifs)
	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			

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

Question 12:

If, **before** credit, cover or other support has been approved, you have reason to believe that **bribery may be involved in the transaction** (e.g. press reports from a reputable source, information provided by participants in the transaction) related to the award of the export contract, what action(s) are taken?				Elaboration for "other" answers and/or any additional comments/clarifications:
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	Business staff, checking the transaction, must require the applicant / exporter more information in order to clarify any doubt about the suspicion of bribes. At the same time a prior information is given to SACE's Legal Department about this further enquiry. If the information provided is not deemed as sufficient, the staff informs Top Management and they decide whether reject the transaction or ask for more detailed explanations. They also may decide to appoint the Legal Department in order to report the case to law enforcement authorities and start a public procedure. Please take note that SACE staff's request concerns only the transaction under examination. On the contrary, an enhanced due diligence procedure investigates not only about the transaction under examination, but also about the management control system of the exporter / applicant. The Top Management, after a first investigation done by the business staff, on the collected information basis, may decide to enhance due diligence.
	Other	X	always	Please note that in our response to the Survey question we outline the process that is undertaken, always, when we have reason to believe that bribery may be involved in the transaction before credit, cover or other support has been approved. To this end, we have explained the due diligence that is conducted: through requiring information from the exporter/applicant, further to involving our Legal Department. Should the information supplied be insufficient, we either reject the transaction or request further explanation/due diligence. As outlined in our response, this would include the reporting of the incident to the law enforcement authorities, should that be relevant. After such internal investigation, we would either reject the transaction or conduct further enhanced due diligence. Therefore, an enhanced due diligence is undertaken, always, before the credit, cover or other support has been approved, should we have reason to believe that bribery may be involved in the transaction.
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			

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

Question 12:

If, **before** credit, cover or other support has been approved, you have reason to believe that **bribery may be involved in the transaction** (e.g. press reports from a reputable source, information provided by participants in the transaction) related to the award of the export contract, what action(s) are taken?				Elaboration for "other" answers and/or any additional comments/clarifications:
Korea (K-sure)	Enhanced due diligence is undertaken	X	always	K-sure is not supposed to have a mandate to 'conclude' or 'judge' that bribery is involved in the transaction with, for example, press reports. Therefore, K-sure may practically inform first the appropriate authorities of the allegations.
	Other	X	sometimes	
Luxembourg	Enhanced due diligence is undertaken	X	always	
	Other			
Mexico	Enhanced due diligence is undertaken			If Bancomext has reason to believe that bribery may be involved in the transaction, 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	
	Other			
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	See comments under Question 11.
	Other	X	always	

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

Question 12 (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	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Austria	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	We would require additional information about the transaction; this could include information from third parties, information and verification of measures taken by the exporter/applicant.
		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	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 (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, sometimes	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	Précisions demandées au demandeur, copies des contrats, informations auprès des Mission Economiques
		No fixed policy.			
		Other			
Germany	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		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			

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

Question 12 (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:
Hungary (MEHIB)	Yes, always	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)	Yes, always	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	Yes, sometimes	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			
Italy	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 (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 (K-sure)	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	The approval of the application is also suspended pending the outcome of the review by law enforcement authorities. K-sure is not supposed to have a mandate to 'conclude' or 'judge' that bribery is involved in the transaction with, for example, press reports. Therefore, K-sure may practically inform first the appropriate authorities of the allegations.
		No fixed policy.			
		Other	X	always	
Luxembourg	Yes, always	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			

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

Question 12 (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:
Netherlands	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		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, sometimes	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	We would require additional information about the transaction; this could include to seek for further information from publicly available sources (e.g. internet, newspapers) from local diplomatic authorities, from third parties or the verification of procedures followed by the exporter /applicant (e.g. procurement procedures)
		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 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	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		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	Article 9 of the Directives on Combating Bribery of Foreign Public Officials in International Business Transactions reads: 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

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

Question 12 (continued):

If enhanced due diligence is undertaken:					Elaboration for "other" answers and/or any additional comments/ clarifications:
	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?			
		No fixed policy.			transactions, the issue shall be brought to the agenda of the Executive Committee of the Bank by the related department. The Executive Committee shall discuss the issue promptly and –if so required- shall inform the public prosecution office and take the necessary measures.
		Other			

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

Question 12 (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:
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	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			