Section III: Actions Taken in Relation to a Specific Transaction After Credit, Cover or Other Support Has Been Approved

Question 15:

If, **after** credit, cover or other support has been approved, you become aware of **credible evidence that bribery was involved in the award of the export contract for a transaction**, what action(s) are taken?				Elaboration for "other" answers and/or any additional comments/clarifications:
Australia	Law enforcement authorities are informed	X	always	
	Other			
Austria	Law enforcement authorities are informed	X	always	OeKB would inform the Ministry of Finance which would inform the law enforcement authorities.
	Other			
Belgium	Law enforcement authorities are informed	X	sometimes	The disclosure is a competence of the management committee or the board .
	Other			
Canada	Law enforcement authorities are informed	X	always	In addition to undertaking enhanced due diligence, no further support will be provided to the relevant party, whether in a related transaction or otherwise, until such time as EDC is satisfied there was no bribery involved in the transaction or that satisfactory systems have been implemented to deter further bribery.
	Other			
Czech Republic (EGAP)	Law enforcement authorities are informed	X	always	
	Other			
Czech Republic (CEB)	Law enforcement authorities are informed	X	always	
	Other			
Denmark	Law enforcement authorities are informed	X	always	Depending on how strong the evidence is. We assume that credible evidence represent rather strong evidence.
	Other			
Finland	Law enforcement authorities are informed	X	always	
	Other			
France	Law enforcement authorities are informed	X	always	Charte éthique Coface applicable aux procédures publiques : dispositions relatives à la lutte contre la corruption Le comité anti-corruption décidera, en cas d'indices sérieux de corruption, s'il convient de transmettre un dossier à la DGTPE.
	Other			
Germany	Law enforcement authorities are informed	X	always	
	Other			
Greece	Law enforcement authorities are informed	X	always	Enhanced due diligence is undertaken.
	Other	X	always	
Hungary (MEHIB)	Law enforcement authorities are informed	X	always	In-house ad hoc Anti –Bribery Committe (MEHIB) takes necessary measures.
	Other			
Hungary (Eximbank)	Law enforcement authorities are informed	X	always	The relevant permanent Censorship Committee (Eximbank) takes necessary measures.
	Other			
Israel	Law enforcement authorities are informed	X	sometimes	As of July 2011, Enhanced due diligence is always undertaken if ASHRA has reason to believe that bribery is involved in the transaction. ASHRA has appointed a committee headed by the CEO which will review the findings of the enhanced due diligence and will decide on any course of action or measures to be taken (such as informing the law enforcement authorities).
	Other			
Italy	Law enforcement authorities are informed	X	always	
	Other			
Japan (JBIC)	Law enforcement authorities are informed	X	always	
	Other			

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Japan (NEXI)	Law enforcement authorities are informed	X	always	
	Other			
Korea (Eximbank)	Law enforcement authorities are informed	X	always	
	Other			
Korea (K-sure)	Law enforcement authorities are informed	X	always	
	Other			
Luxembourg	Law enforcement authorities are informed	X	always	
	Other			
Mexico	Law enforcement authorities are informed	X	always	When the crime affects the Institution directly, such crime is communicated to the authority and Bancomext would withdraw the approval or in such case, the credit has already been disbursed, it will call back the credit and request for its immediate payment.
	Other	X	always	
Netherlands	Law enforcement authorities are informed	X	always	If there is credible evidence that bribery was involved in the award of the export contract Atradius will take the appropriate measures as mentioned in art. 2k of the Action Statement.
	Other			
New Zealand	Law enforcement authorities are informed	X	always	
	Other			
Norway	Law enforcement authorities are informed	X	always	According to internal rules of procedure GIEK will inform Norwegian law Enforcement Authorities if considered appropriate after an evaluation of the actual situation.
	Other			
Poland	Law enforcement authorities are informed	X	always	
	Other			
Portugal	Law enforcement authorities are informed	X	sometimes	Law enforcement authorities can be informed of a credible evidence of bribery, after coordination with the Council, depending on a case by case evaluation.
	Other			
Slovak Republic	Law enforcement authorities are informed	X	always	No title for indemnification shall arise on the basis of insurance concluded in accordance with the Insurance Conditions in case the insured or a person acting for him or on his behalf violates the standards and practices of the international law which are binding for the Slovak Republic*. (*e.g. the Announcement of the Ministry of Foreign Affairs of the Slovak Republic No.318/1999 Coll. Convention on Combating Bribery of Foreign Public Officials in International Business Transactions)
	Other			
Spain	Law enforcement authorities are informed	X	always	If there is a legal proceeding in course CESCE suspends cover until the official investigation is over.
	Other	X	always	
Sweden	Law enforcement authorities are informed	X	always	
	Other			
Switzerland	Law enforcement authorities are informed	X	always	
	Other			
Turkey	Law enforcement authorities are informed	X	always	Turk Eximbank suspends any further disbursements or claims until the official investigation is over.
	Other	X	always	

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United Kingdom	Law enforcement authorities are informed	X	always	Many of ECGD's rights only arise once an exporter, or anyone acting on that exporter's behalf, has been convicted of bribery. Accordingly, ECGD will have to wait until the relevant criminal proceedings have been concluded before it may exercise those rights. Where ECGD has a right to claim compensation as a result of corrupt activity, this right will only arise where ECGD has suffered loss as a result of the corrupt activity in question and that activity has been proved by a judgement in a criminal or civil court of competent jurisdiction.
	Other			
United States (EXIM)	Law enforcement authorities are informed	X	always	
	Other			
United States (USDA)	Law enforcement authorities are informed	X	always	Any further applications received would be placed on hold pending investigation by FAS and the OIG. These applications may become void depending on the outcome of the matter.
	Other	X	always	