TRADE DIRECTORATE
TRADE COMMITTEE

Cancels & replaces the same document of 27 April 2007

Working Party on Export Credits and Credit Guarantees

SURVEY ON MEASURES TAKEN TO COMBAT BRIBERY IN OFFICIALLY SUPPORTED EXPORT CREDITS - 2006 REVISION

PURPOSE: This document contains the 2006 Survey on Measures Taken to Combat Bribery in Officially Supported Export Credits; it has been revised, inter alia, to reflect the undertakings contained in the 2006 OECD Recommendation on Bribery and Officially Supported Export Credits. The Survey is meant to provide for the ongoing monitoring and review of measures taken by Members to combat bribery in their official export credit systems; it replaces the previous survey [TD/ECG(2004)11].

TIMING: Initial responses to this ongoing Survey are sought by no later than 27 July 2007. An updated summary of Members’ responses will be issued on a regular basis and made available on the OECD web site to reflect changes reported by Members.

LINK TO PROGRAMME OF WORK AND BUDGET: Output Results: 7R311006.

Contact: Mr. Michael Gonter, Export Credits Division, Trade and Agriculture Directorate, OECD
Tel. +33 (0)1 45 24 18 22; Fax. +33 (0)1 44 30 61 58; e-mail: michael.gonter@oecd.org
SURVEY ON MEASURES TAKEN TO COMBAT BRIBERY
IN OFFICIALLY SUPPORTED EXPORT CREDITS – 2006 REVISION

SECTION I – GENERAL MEASURES TO DETER BRIBERY

Question 1

Do you inform exporters and, where appropriate, applicants, requesting official export credit support about the legal consequences of the bribery in international business transactions under your national legal system including your national laws prohibiting such bribery?

☐ Yes, always ☐ Yes, sometimes (please provide details below) ☐ No

If yes:

a) Please indicate the method(s) by which this is accomplished:

☐ text in the application form
☐ a stand-alone document is provided to applicants
☐ text included in a stand-alone document submitted by applicants
☐ text in the general conditions of cover (for export credit insurance and guarantees)
☐ text in the credit agreement
☐ information posted on the organisation’s web site
☐ customer publications (e.g. brochures, handbooks)
☐ other (please elaborate):

________________________________________________________________________

________________________________________________________________________
b) Please provide the text used to describe the legal consequences of the bribery in international business transactions under your national legal system including your national laws prohibiting such bribery:

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

Comments/clarifications/additional information related to the answers provided above:

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

Please describe any additional measures taken in relation to information provided to exporters/applicants:

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>
Question 2

Do you encourage exporters and, where appropriate, applicants, requesting official export credit support to develop, apply and document appropriate management control systems that combat bribery?

☐ Yes, always ☐ Yes, sometimes *(please provide details below)* ☐ No

*If yes:*

a) Please indicate how this is accomplished:

☐ text in the application form
☐ a stand-alone document is provided to applicants
☐ text in the general conditions of cover *(for export credit insurance and guarantees)*
☐ text in the credit agreement
☐ information posted on the organisation’s web site
☐ customer publications (e.g. brochures, handbooks)
☐ other (please elaborate):

b) Please provide the text used to encourage exporters and, where appropriate, applicants, requesting official export credit support to develop, apply and document appropriate management control systems that combat bribery:

Comments/clarifications/additional information related to the answers provided above:

Please describe any additional measures taken in relation to exporter/applicant management control systems to combat bribery:
**Question 3**

Do you require exporters and, where appropriate, applicants, requesting official export credit support to provide an undertaking/declaration that neither they, nor anyone acting on their behalf, such as agents, have been engaged or will engage in bribery in the transaction?

☐ Yes, always ☐ Yes, sometimes (*please provide details below*) ☐ No

*If Yes:*

a) The requirement is communicated to exporters/applicants via:

☐ text in the application form
☐ a stand-alone document is provided to applicants
☐ text in the general conditions of cover (*for export credit insurance and guarantees*)
☐ text in the credit agreement
☐ information posted on the organisation’s web site
☐ customer publications (e.g. brochures, handbooks)
☐ other (please elaborate): 

b) The undertaking/declaration is obtained from exporters/applicants through:

☐ the application form
☐ a stand-alone document submitted by the exporter/applicant
☐ other (please elaborate): 

  ☐ at the time of application
  ☐ before support is provided

c) Please provide the text of the requirement and/or the undertaking/declaration provided by exporters/applicants:
Comments/clarifications/additional information related to the answers provided above:

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

Please describe any additional measures taken in relation to exporter/applicant declarations/undertakings:

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>
**Question 4**

Do you verify and note\(^1\) whether exporters, and where appropriate, applicants, are listed on the publicly available debarment lists of the following international financial institutions (IFIs): World Bank Group, African Development Bank, Asian Development Bank, European Bank for Reconstruction and Development and the Inter-American Development Bank?

- [ ] Yes, always
- [ ] Yes, sometimes *(please provide details below)*
- [ ] No

*If Yes:*

a) Which actors associated with the transaction are subject to verification?

- [ ] the applicant  at the time of application  before support is provided
- [ ] the exporter(s)  at the time of application  before support is provided
- [ ] other (e.g. agents – please elaborate)  at the time of application  before support is provided

b) Please indicate how the verification is achieved:

- [ ] staff check the lists  at the time of application  before support is provided
- [ ] exporter/applicant self-declaration  at the time of application  before support is provided
- [ ] other (please elaborate):  at the time of application  before support is provided

Comments/clarifications/additional information related to the answers provided above:

Please describe any additional measures taken in relation to current or past debarment of exporters/applicants by other institutions:

---

\(^1\) Such verification may take the form of a self-declaration from exporters and, where appropriate, applicants, as to whether they are listed on the publicly available IFI debarment lists.
**Question 5**

Do you require exporters and, where appropriate, applicants, to disclose whether they or anyone acting on their behalf in connection with the transaction are currently under charge in a national court or, within a five-year period preceding the application, have been convicted in a national court or been subject to equivalent national administrative measures for violation of laws against bribery of foreign public officials of any country?

☐ Yes, always  ☐ Yes, sometimes *(please provide details below)*  ☐ No

*If Yes:*

a) Please indicate how requirement is met:

☐ the application form provides for such disclosures to be made

☐ a stand-alone document requiring such disclosures must be provided by the exporter/applicant

☐ at the time of application

☐ before support is provided

☐ other (please elaborate):

☐ at the time of application

☐ before support is provided

Comments/clarifications/additional information related to the answers provided above:

Please describe any additional measures taken in relation to exporter/applicant disclosure of charges and/or convictions of bribery:
Question 6

Are agents' commissions (included in the export contract) eligible for official support?

☐ Yes, always  ☐ Yes, sometimes (please provide details below)  ☐ No

If Yes:

a) Do you apply a ceiling to agents’ commissions for which official support is provided?

☐ Yes, always  ☐ Yes, sometimes (please provide details below)  ☐ No

If Yes:

b) Please provide details on the ceiling(s) applied:


c) What is the rationale for imposing a ceiling on agents' commissions?


Comments/clarifications/additional information related to the answers provided above:


Please describe any additional measures taken in relation to the eligibility for official support of agents’ commissions:


Question 7

Do you require that details be provided in respect of agents' commissions associated with the transaction?

☐ Yes, always  ☐ Yes, sometimes (please provide details below)  ☐ No

If yes:

a) Do you require the amounts of commissions to be disclosed?

☐ Yes, always  ☐ Yes, sometimes (please provide details below)  ☐ No

If yes, the amounts of commissions must be disclosed:

☐ at the time of application
☐ before the final decision to provide support is made
☐ before a claim will be indemnified
☐ other (please elaborate):

b) Do you assess whether the level of commissions is consistent with standard business practice?

☐ Yes, always  ☐ Yes, sometimes (please provide details below)  ☐ No

If yes, the assessment is made:

☐ at the time of application
☐ before the final decision to provide support is made
☐ before a claim will be indemnified
☐ other (please elaborate):

c) Do you require the purpose of commissions to be clearly identified?

☐ Yes, always  ☐ Yes, sometimes (please provide details below)  ☐ No

If yes, the purpose is identified:

☐ at the time of application
☐ before the final decision to provide support is made
☐ before a claim will be indemnified
☐ other (please elaborate):
d) Do you require that details (e.g. name, company, address) be provided in respect of the **agent(s)** to whom commissions are paid?

- [ ] Yes, always  
- [ ] Yes, sometimes *(please provide details below)*  
- [ ] No

*If yes, the details must be provided:*

- [ ] at the time of application
- [ ] before the final decision to provide support is made
- [ ] before a claim will be indemnified
- [ ] other *(please elaborate)*:

```

```

Comments/clarifications/additional information related to the answers provided above:

```

```

Please describe any additional measures taken in relation to the collection of information on and/or review of agents’ commissions:

```

```

```

```
**Question 8**

Have you developed and implemented procedures to disclose to your law enforcement authorities instances of credible evidence\(^2\) of bribery?

☐ Yes  ☐ No

*If Yes:*

Please provide a short description of your policies and procedures:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________

Comments/clarifications/additional information related to the answers provided above:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

Please describe any additional measures taken in relation to the disclosure of information on possible instances of bribery to law enforcement authorities:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

---

\(^2\) As defined in the OECD Council Recommendation on Bribery and Officially Supported Export Credits.
SECTION II – ACTIONS TAKEN IN RELATION TO A SPECIFIC APPLICATION BEFORE CREDIT, COVER OR OTHER SUPPORT HAS BEEN APPROVED

Question 9

If, before credit, cover or other support has been approved, you become aware that an exporter and, where appropriate, applicant (or anyone acting on their behalf in connection with the transaction) are listed on any of debarment lists that you verify, what action(s) are taken?

☐ Enhanced due diligence is undertaken. ☐ always ☐ sometimes (please provide details below)

☐ Other (please elaborate): ☐ always ☐ sometimes (please provide details below)

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?

☐ Yes, always ☐ Yes, sometimes (please provide details below) ☐ No

b) Does the enhanced due diligence process include, *inter alia*, verification that the exporter/applicant has taken appropriate internal corrective and preventative measures after having been debarred?

☐ Yes, always ☐ Yes, sometimes (please provide details below) ☐ No

c) How is the application treated?

☐ The approval of the application is suspended pending the outcome of the enhanced due diligence process. ☐ always ☐ sometimes (please provide details below)

☐ No fixed policy.

☐ Other (please elaborate): ☐ always ☐ sometimes (please provide details below)

Comments/clarifications/additional information related to the answers provided above:


Question 10

If, before credit, cover or other support has been approved, you become aware that an exporter and, where appropriate, applicant (or anyone acting on their behalf in connection with the transaction) is currently under charge in a national court for violation of laws against bribery of foreign public officials of any country, what action(s) are taken?

☐ Enhanced due diligence is undertaken. ☐ always ☐ sometimes (please provide details below)
☐ Other (please elaborate): ☐ always ☐ sometimes (please provide details below)

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?

☐ Yes, always ☐ Yes, sometimes (please provide details below) ☐ No

b) How is the application treated?

☐ The approval of the application is suspended pending the outcome of the enhanced due diligence process. ☐ always ☐ sometimes (please provide details below)
☐ No fixed policy.
☐ Other (please elaborate): ☐ always ☐ sometimes (please provide details below)

Comments/clarifications/additional information related to the answers provided above:
**Question 11**

If, **before** credit, cover or other support has been approved, you become aware that an exporter/applicant (or anyone acting on their behalf in connection with the transaction) **has been convicted in a national court or has been subject to equivalent national administrative measures for violation of laws against bribery of foreign public officials of any country within a five-year period**, what actions are taken?

- Enhanced due diligence is undertaken.  
  - always  
  - sometimes (please provide details below)
- Other (please elaborate):
  - always  
  - sometimes (please provide details below)

*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?

- Yes, always  
- Yes, sometimes (please provide details below)  
- No

b) Does the enhanced due diligence process include, *inter alia*, verification that the exporter/applicant has taken appropriate internal corrective and preventative measures after having been convicted?

- Yes, always  
- Yes, sometimes (please provide details below)  
- No

c) How is the application treated?

- The approval of the application is suspended pending the outcome of the enhanced due diligence process.  
  - always  
  - sometimes (please provide details below)

- No fixed policy.

- Other (please elaborate):
  - always  
  - sometimes (please provide details below)

Comments/clarifications/additional information related to the answers provided above:
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?

- [ ] Enhanced due diligence is undertaken.  
  - [ ] always  
  - [ ] sometimes (please provide details below)
- [ ] Other (please elaborate):  
  - [ ] always  
  - [ ] sometimes (please provide details below)

*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?

- [ ] Yes, always  
- [ ] Yes, sometimes (please provide details below)  
- [ ] No

b) How is the application treated?

- [ ] The approval of the application is suspended pending the outcome of the enhanced due diligence process.  
  - [ ] always  
  - [ ] sometimes (please provide details below)
- [ ] No fixed policy.
- [ ] Other (please elaborate):  
  - [ ] always  
  - [ ] sometimes (please provide details below)

Comments/clarifications/additional information related to the answers provided above:


**Question 13**

If, **before** 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 the transaction**, what action(s) are taken?

<table>
<thead>
<tr>
<th>Action</th>
<th>Always</th>
<th>Sometimes (please provide details below)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Law enforcement authorities are informed.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Enhanced due diligence is undertaken.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Support is not provided for the transaction.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other (please elaborate):</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*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?

<table>
<thead>
<tr>
<th>Answer</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes, always</td>
<td>Yes, sometimes (please provide details below)</td>
</tr>
<tr>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

b) How is the application treated?

<table>
<thead>
<tr>
<th>Answer</th>
<th>Always</th>
<th>Sometimes (please provide details below)</th>
</tr>
</thead>
<tbody>
<tr>
<td>The approval of the application is suspended pending the outcome of the enhanced due diligence process.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No fixed policy.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other (please elaborate):</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*If investigative authorities are informed:*

c) How is the application treated?

<table>
<thead>
<tr>
<th>Answer</th>
<th>Always</th>
<th>Sometimes (please provide details below)</th>
</tr>
</thead>
<tbody>
<tr>
<td>The approval of the application is suspended pending the outcome of the review by law enforcement authorities.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No fixed policy.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other (please elaborate):</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Comments/clarifications/additional information related to the answers provided above:
SECTION III – ACTIONS TAKEN IN RELATION TO A SPECIFIC TRANSACTION AFTER CREDIT, COVER OR OTHER SUPPORT HAS BEEN APPROVED

**Question 14**

If, **after** 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?

- Law enforcement authorities are informed.  
  - always
  - sometimes (please provide details below)

- Enhanced due diligence is undertaken.  
  - always
  - sometimes (please provide details below)

- Other (please elaborate):  
  - always
  - sometimes (please provide details below)

Comments/clarifications/additional information related to the answers provided above:

---

**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?

- Law enforcement authorities are informed.  
  - always
  - sometimes (please provide details below)

- Other (please elaborate):  
  - always
  - sometimes (please provide details below)

Comments/clarifications/additional information related to the answers provided above:

---
Question 16

If, after credit, cover or other support has been approved, it is proven that bribery was involved in the award of the export contract for a transaction, what action(s) are taken?

- Law enforcement authorities are informed. (only in relation to a conviction outside the Member’s country) [ ]
  - always [ ] sometimes (please provide details below) [ ]

- Loan disbursements are interrupted. [ ]
  - always [ ] sometimes (please provide details below) [ ]

- Cover is invalidated (for export credit insurance and guarantees). [ ]
  - always [ ] sometimes (please provide details below) [ ]

- Claims are not indemnified (for export credit insurance and guarantees). [ ]
  - always [ ] sometimes (please provide details below) [ ]

- Recourse is sought for amounts disbursed. [ ]
  - always [ ] sometimes (please provide details below) [ ]

- Recourse is sought for claims that have already been paid (for export credit insurance and guarantees). [ ]
  - always [ ] sometimes (please provide details below) [ ]

- Access to official support is denied for a specified period of time. [ ]
  - always [ ] sometimes (please provide details below) [ ]

- Other (please elaborate): [ ]
  - always [ ] sometimes (please provide details below) [ ]

Comments/clarifications/additional information related to the answers provided above:

____________________________________________________________________________________

____________________________________________________________________________________

____________________________________________________________________________________

____________________________________________________________________________________

____________________________________________________________________________________
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:

<table>
<thead>
<tr>
<th>You became aware that an exporter/applicant was on one of the debarment lists that you verify, and...</th>
<th>You became aware that an exporter/applicant was under charge in a national court for bribery, and...</th>
<th>You became aware that an exporter/applicant had been convicted in a national court or had been subject to equivalent national administrative measures for bribery, and...</th>
<th>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), and...</th>
<th>You became aware of credible evidence that bribery was involved in the award of the export contract for a transaction, and...</th>
</tr>
</thead>
<tbody>
<tr>
<td>... you notified law enforcement authorities.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>... you undertook enhanced due diligence.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>... you decided not to provide support for the transaction.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>... you suspended approval of the application pending the outcome of the enhanced due diligence process.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>... you suspended approval of the application pending the outcome of the legal process.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>... [other].</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>... [other].</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Please describe the circumstances of the actual incidents noted in the preceding table. It is recognised that Members may not be able to provide certain information in respect of a given transaction, e.g. if the transaction is subject to an ongoing investigation or prosecution or if the information is commercially confidential.
**Question 18**

Please indicate by marking the appropriate boxes if you have had any experience with the following scenarios related to the time after credit, cover or other support has been approved:

<table>
<thead>
<tr>
<th>You became aware that an exporter/applicant was under charge in a national court for bribery, and...</th>
<th>You became aware that an exporter/applicant had been convicted in a national court or had been subject to equivalent national administrative measures for bribery, and...</th>
<th>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), and...</th>
<th>You became aware of credible evidence that bribery was involved in the award of the export contract for a transaction, and...</th>
<th>It was proven that bribery was involved in the award of the export contract for a transaction, and...</th>
</tr>
</thead>
<tbody>
<tr>
<td>... you notified law enforcement authorities.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>... you interrupted loan disbursements.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>... you invalidated export credit cover.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>... you did not indemnify a claim.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>... you sought recourse for disbursed loan amounts.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>... you sought recourse for claims that had already been paid.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>... denied access to official support for a specified period of time.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>... [other].</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>... [other].</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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.

<table>
<thead>
<tr>
<th>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.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

4 See footnote 3.
SECTION V – PRACTICAL APPLICATION OF KEY TERMS

Question 19

Please provide a detailed description of your Enhanced Due Diligence Procedures, addressing, inter alia:

➢ Whether they comprise verification that the exporter/applicant has in place appropriate management control systems that combat bribery.

➢ Whether the procedures seek to verify whether an exporter/applicant that has been debarred by an IFI (or any other entity checked under your procedures) or convicted of bribery has taken appropriate internal corrective and preventative measures after having been debarred or convicted.

➢ The treatment of agents’ commissions under the procedures.
Question 20

Please describe how the term **Credible Evidence** is applied in practice under your system (e.g. who makes the assessment). Any Member who has adopted a definition which is broader (i.e. that sets a lower threshold) than the definition provided in footnote 5 of the OECD Council Recommendation on Bribery and Officially Supported export Credits should provide its definition.

---

Question 21

Please describe how the term **national court** is applied under your system (i.e. does it apply to any national court, or is it limited to certain national courts such as your own and/or the national courts of the buyer/borrower country).
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?

- [ ] Yes
- [ ] No

Comments on measures and/or actions under consideration:

<table>
<thead>
<tr>
<th>Comments on measures and/or actions under consideration:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

**Question 23**
Would you be prepared to exchange information with other ECG Members about suspected and/or proven instances of bribery related to specific officially supported export credit transactions?

- [ ] Yes
- [ ] No

Comments:

<table>
<thead>
<tr>
<th>Comments:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>
SECTION VII – ADDITIONAL COMMENTS

Please provide any additional comments on the items covered in the survey, or in relation to any issue, policy, or practice which has not been addressed (including any additional measures you take to combat bribery).

[Blank lines for comments]