

## Environmental and Social Survey

### REPORTING COUNTRY INFORMATION

ESS-NLD-ATRADIUS (05-11-2015) version 2

Reporting Country **Netherlands**  
Submission Date **05 November 2015**

Reporting Institution **ATRADIUS**  
Version number **2**

### I GENERAL PRINCIPLES

#### Objectives

1. Please describe the policies and procedures that you have established to support the objectives of the Recommendation. Please include details about your organisational structure, the operational process and supporting tools.

**The revised Common Approaches has led to a revision of our national policy document in August 2012. This policy document includes procedural guidance. At the operational level Atradius DSB has developed procedures in which the objectives of the Dutch policy are addressed. All insurance applications for export transactions and investments are screened. Based on the screening, applications for transactions or projects over 10 million euro are classified. If it is clear that a transaction /project under the 10 million euro threshold will involve a sensitive sector or sensitive area, classification and review will follow. On the Atradius DSB webpage a summary is given of the review process and the revised policy document and a specific brochure is available.**

2. Please provide a link to the environmental and social due diligence page of your institution's website.

<http://www.atradiusdutchstatebusiness.nl/dsben/cr/index.html>

### II SCREENING

#### Exemptions

3. Are all applications (apart from those related to military equipment and agricultural commodities) screened? **Yes**

If no, please provide details of any exemptions from screening, including:

(a) value of any threshold used:  (b) currency:

(c) details of any products exempt from screening:

(d) details of any other exemptions from screening:

#### Information requirements

4. What information is required for the screening process?

Application form ☒ Separate environmental/social questionnaire ☐

Sector / issue-specific questionnaires (please specify) ☐ Other (please specify) ☒

**Sometimes additional questions need to be answered in order to finalise the screening process.**

#### Responsibility for screening

5. Who is responsible for screening applications?

Underwriter ☐ Practitioner ☒

ECA Consultant ☐ Other (please specify) ☐

#### Screening policies

6. Do you have policies and procedures in place to identify exports of capital goods and services destined to:

(a) Projects or to existing operations as defined in the Recommendation? **Yes**

If yes, please provide details:

**We have described our procedures in our policy document. The procedures have been made available on our website.**

(b) Identified locations that are in or near sensitive areas? **Yes**

If yes, please provide details:

**We always perform an environmental and social due diligence when a sensitive area is involved. We follow the process according to the Common Approaches.**



## Environmental and Social Survey

### REPORTING COUNTRY INFORMATION

**ESS-NLD-ATRADIUS (05-11-2015) version 2**

Reporting Country **Netherlands**  
 Submission Date **05 November 2015**

Reporting Institution **ATRADIUS**  
 Version number **2**

### Classification system

7. Do you classify applications described in paragraph 8 of the Recommendation? **Yes**

If yes, how do you classify such applications?

**Using "EO" category**

**We have a separate classification category for such projects, called "M". When operations are existing and not changing significantly we perform a reputational review (marginal review)**

8. Do you classify applications described in paragraph 9 of the Recommendation? **Yes**

If yes, how do you classify such applications?

**Using "A, B, C" Categories**

**We also classify projects under 10 mln EUR when we categorise them as sensitive sector or sensitive area**

### III CLASSIFICATION

9. Do you have policies and procedures in place to identify the potential positive and negative environmental and social impacts relating to the applications to be classified? **Yes**

If yes, please provide details, including any specific tools employed:

**We classify the applications based on the transaction, the project definition and project surroundings. We take into account operational and functional relations, location and timing**

### Responsibility for classification

10. Who is responsible for the classification of applications?

Underwriter	<input type="checkbox"/>	Practitioner	<input checked="" type="checkbox"/>
ECA Consultant	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>

### IV ENVIRONMENTAL AND SOCIAL REVIEW

#### Scope and criteria

11. (a) Do you have policies and procedures in place for reviewing projects when supporting exports forming only a minor part of a project [i.e. co-insuring / financing with another Export Credit Agency (ECA), Multilateral Financial Institution (MFI) or development agency] or in re-insurance situations? **Yes**

If yes, please provide details, for example:

**May take account of review carried out by other ECAs, MFIs or Development Agency**

(b) Any other comments:

**We are always responsible for our own review and use the policies and procedures as described above (our answers to questions 2 and 3 are applicable). However, we will take into account reviews by other parties.**

12. Do you have policies and procedures in place for assessing, where appropriate, the potential environmental and/or social impacts of any associated facilities? **Yes**

If yes, please provide details:

**We take into account associated facilities as a part of the project definition procedure**

13. Do you have policies and procedures in place for considering, where appropriate, any statements or reports from your National Contact Point (NCP)? **Yes**

If yes, please provide details:

**In our policy document we state that information from the NCP, when relevant, must be taken into account during the review process.**



## Environmental and Social Survey

### REPORTING COUNTRY INFORMATION

**ESS-NLD-ATRADIUS (05-11-2015) version 2**

Reporting Country **Netherlands**  
 Submission Date **05 November 2015**

Reporting Institution **ATRADIUS**  
 Version number **2**

### Category A projects

14. Under paragraph 17 of the Recommendation, Members should require an Environmental and Social Impact Assessment (ESIA) to be undertaken for Category A projects. Are there any circumstances in which you might accept to review a Category A project for which an ESIA has not been undertaken or for which either an ESIA report is not available for review or does not adequately address all the issues set out in Annex II of the Recommendation?

**Yes**

If yes, please provide details, including the type of information that you would require in the absence of a (complete) ESIA:

**Sometimes we categorise a project as A and local legislation does not demand an EIA for the project. In such cases we would demand information of equal level to the information that would be part of the EIA as written down in annex 2 of the Common Approaches.**

### Category B projects

15. The scope of a review for Category B projects may vary from project to project. Please provide details of your general approach to reviewing Category B projects, including the type of information required under your policies and procedures.

**The review of Category B projects is similar to a Category A project. We always request an ESIA. If an ESIA is not available at least equal environmental & social information in e.g. assessment reports, studies & plans etc. is required for Category B projects**

### Responsibility for review

16. Who is responsible for undertaking the environmental and social review?

Underwriter ☐ Practitioner ☒  
 ECA Consultant ☐ Other (please specify) ☐

### Standards for benchmarking projects

17. How do you seek assurance that a project is compliant with host country standards?

**An EIA includes an assessment of local legislation. We check if the EIA is approved by the authorities and whether permits are issued.**

18. Paragraphs 20-21 of the Recommendation set out the general circumstances in which various international standards should be used for the purposes of evaluating the potential environmental and social impacts of projects. Please provide details of when, in practice, you would use the following international standards:

(a) World Bank Safeguard Policies.

**Never**

(b) International Finance Corporation (IFC) Performance Standards.

**All projects**

(c) Multilateral Financial Institution (MFI) standards.

**Where such institutions are supporting a project**

(d) Any other comments:

19. Do you have policies and procedures in place for dealing with cases where projects do not meet the international standards or guidelines against which they have been benchmarked?

**Yes**

If yes, please provide details:

**In exceptional cases in which a project does not meet the relevant aspects of the international standards against which it has been benchmarked, the reasons for the failure to meet such international standards and the related justification for supporting the project will be discussed with our guardian authorities.**



## Environmental and Social Survey

### REPORTING COUNTRY INFORMATION

**ESS-NLD-ATRADIUS (05-11-2015) version 2**

Reporting Country **Netherlands**

Submission Date **05 November 2015**

Reporting Institution **ATRADIUS**

Version number **2**

### Site visits

20. Please specify the circumstances in which you might carry out a site visit as part of the review process.

- |  |   |
|--|---|
| <p>(a) All projects <input type="checkbox"/></p> <p>(b) Category A projects <input type="checkbox"/></p> <p>(c) Category A project finance transactions only <input type="checkbox"/></p> <p>(d) Category B projects <input type="checkbox"/></p> <p>(e) Project finance transactions <input type="checkbox"/></p> | <p>(f) Project involves particularly complex/unusual potential impacts <input checked="" type="checkbox"/></p> <p>(g) Project located in or near sensitive area <input type="checkbox"/></p> <p>(h) Project generating significant stakeholder interest <input type="checkbox"/></p> <p>(i) To verify project impact information provided <input type="checkbox"/></p> <p>(j) Other (please specify) <input type="checkbox"/></p> |
|--|---|

**We do not visit many projects. Only in special cases we perform site visits.**

### V EVALUATION, DECISION AND MONITORING

#### Providing official support

21. Who is responsible for deciding whether to decline or provide official support and, in the event that support is to be provided, whether this should involve conditions to fulfil?

- |   |   |
|---|---|
| Underwriter <input type="checkbox"/>                        | Practitioner <input type="checkbox"/>           |
| Senior ECA staff <input type="checkbox"/>                   | ECA committee / board <input type="checkbox"/>  |
| Guardian Authority(ies) <input checked="" type="checkbox"/> | Other (please specify) <input type="checkbox"/> |

22. (a) Under what circumstances would you consider denying support on account of the environmental and social impacts of a project? Please provide details.

**When, on balance, the environmental & social impacts comes out negative and when unacceptable issues remain after the review process.**

(b) Please provide any examples of experience.

**We have denied in total 5 projects on environmental and social issues. Some examples are:**  
**- The permits and acceptance of the EIA were in place before all formal procedures were finished.**  
**- Significant negative ecological impacts without proper mitigation and compensation.**

#### Conditions to official support

23. (a) How are environmental and/or social conditions to be fulfilled prior to, or after, the final commitment for official support incorporated into documentation? Please provide details.

**Prior to official support we include a specific condition in the insurance documentation (promise of cover) in cases when the E&S due diligence has not been finalised. After official support we only include E&S conditions in cases of Category A project finance**

(b) Please provide examples of any environmental and/or social conditions used.

**Conditions may include permits, environmental & social management plans etc.**



## Environmental and Social Survey

### REPORTING COUNTRY INFORMATION

ESS-NLD-ATRADIUS (05-11-2015) version 2

Reporting Country

Netherlands

Reporting Institution

ATRADIUS

Submission Date

05 November 2015

Version number

2

### Monitoring

24. Do you have policies and procedures in place for monitoring, as appropriate, the implementation of a project to ensure compliance with the conditions of your official support?

Yes

If yes, please provide details:

(a) Types of projects:

(i) All projects

☐

(vi) Project involves particularly complex/unusual potential impacts

☐

(ii) Category A projects

☐

(vii) Project located in or near sensitive area

☐

(iii) Category A project finance transactions only

☒

(viii) Project likely to generate significant stakeholder interest

☐

(iv) Category B projects

☐

(ix) To verify how impacts are being addressed

☐

(v) Project finance transactions

☐

(x) Where support is provided subject to certain conditions

☐

(xi) Any other (please specify)

☐

(b) Monitoring frequency/period:

(i) during construction:

other (please specify)

(ii) during operation:

other (please specify)

(c) Content:

(d) Any other comments:

The monitoring strategy will be defined on a case-by-case basis. We require regular ex post reports and related information to be provided, at least annually, during our involvement in the project to ensure that relevant potential environmental and/or social impacts are addressed according to the information provided by applicants during the environmental and social review.

25. Who is responsible for undertaking monitoring of projects, including, if appropriate, making site visits, reviewing monitoring reports, deciding on compliance, etc?

Underwriter

☐

Practitioner

☒

ECA Consultant

☐

Other (please specify):

☐

We expect in most cases consultant involvement in these projects. In most cases an ECA Consultant will report on the monitoring requirement and its compliance.

### Non-compliance measures

26. (a) What actions are available to you in cases where monitoring reveals that conditions are not being complied with?

In case of non-compliance a corrective action plan will be discussed with the project sponsor

(b) Please provide any examples of experience.



## Environmental and Social Survey

### REPORTING COUNTRY INFORMATION

**ESS-NLD-ATRADIUS (05-11-2015) version 2**

Reporting Country **Netherlands**  
Submission Date **05 November 2015**

Reporting Institution **ATRADIUS**  
Version number **2**

### Disclosure of monitoring reports

27. (a) In what circumstances do you encourage project sponsors to make *ex post* monitoring reports and related information publicly available?

- |  |                                     |  |                          |
|--|-------------------------------------|--|--------------------------|
| (i) All projects                                   | <input type="checkbox"/>            | (vi) Project involves particularly complex/unusual potential impacts | <input type="checkbox"/> |
| (ii) Category A projects                           | <input type="checkbox"/>            | (vii) Project located in or near sensitive area                      | <input type="checkbox"/> |
| (iii) Category A project finance transactions only | <input checked="" type="checkbox"/> | (viii) Project likely to generate significant stakeholder interest   | <input type="checkbox"/> |
| (iv) Category B projects                           | <input type="checkbox"/>            | (ix) Where project not in compliance with support                    | <input type="checkbox"/> |
| (v) Project finance transactions                   | <input type="checkbox"/>            | (x) None   | <input type="checkbox"/> |
| (xi) Any other (please specify)                    | <input type="checkbox"/>            |  |                          |

**We only monitor Project Finance Category A projects. In these cases project sponsor publicly discloses ex-post monitoring reports and other related information as a part of a communication strategy of the project. If this is not the case we will encourage the project sponsor to do so**

(b) In what circumstances, if any, does your ECA require project sponsors to make such information publicly available or itself seek to make such information publicly available?

- |  |                          |  |                                     |
|--|--------------------------|--|-------------------------------------|
| (i) All projects                                   | <input type="checkbox"/> | (vi) Project involves particularly complex/unusual potential impacts | <input type="checkbox"/>            |
| (ii) Category A projects                           | <input type="checkbox"/> | (vii) Project located in or near sensitive area                      | <input type="checkbox"/>            |
| (iii) Category A project finance transactions only | <input type="checkbox"/> | (viii) Project likely to generate significant stakeholder interest   | <input type="checkbox"/>            |
| (iv) Category B projects                           | <input type="checkbox"/> | (ix) Where project not in compliance with support                    | <input type="checkbox"/>            |
| (v) Project finance transactions                   | <input type="checkbox"/> | (x) None   | <input checked="" type="checkbox"/> |
| (xi) Any other (please specify)                    | <input type="checkbox"/> |  |                                     |

**see 27 a.**

## VI EXCHANGE AND DISCLOSURE OF INFORMATION

### Environmental and social procedural guidance

28. Have you published national ECA environmental and other related policy statements or principles and procedural guidance? **Yes**

### Exchanging information

29. Do you have policies and procedures in place for exchanging information with other ECAs and MFIs? **Yes**  
If yes, please provide details:

(a) co-insuring/co-financing situations:

- |  |                                     |  |                          |
|--|-------------------------------------|--|--------------------------|
| Ad hoc informal exchanges (email, telephone, etc.) | <input checked="" type="checkbox"/> | Ad hoc bilateral / multilateral meetings | <input type="checkbox"/> |
| Practitioners' events                              | <input checked="" type="checkbox"/> | Other (please specify)                   | <input type="checkbox"/> |

**We share information (but not our due diligence reports) with other ECAs and, if appropriate, with other financial institutions involved in the project, with a view to seeking, where appropriate, common positions on the review of projects, including project classification.**

(b) competitive situations:

- |  |                                     |  |                          |
|--|-------------------------------------|--|--------------------------|
| Ad hoc informal exchanges (email, telephone, etc.) | <input checked="" type="checkbox"/> | Ad hoc bilateral / multilateral meetings | <input type="checkbox"/> |
| Practitioners' events                              | <input checked="" type="checkbox"/> | Other (please specify)                   | <input type="checkbox"/> |

**In case of competitive situations we share information (but not our due diligence reports) taking into account the competitive context in which they operate and constraints of business confidentiality**



## Environmental and Social Survey

### REPORTING COUNTRY INFORMATION

**ESS-NLD-ATRADIUS (05-11-2015) version 2**

Reporting Country **Netherlands**

Submission Date **05 November 2015**

Reporting Institution **ATRADIUS**

Version number **2**

### Ex ante disclosure of project information

30. Please provide details of your policies and procedures for disclosing publicly information on Category A projects before a final commitment to grant official support, including:

(a) The scope and content of information released:

Project name	<input type="checkbox"/>	Project location	<input checked="" type="checkbox"/>
Description of exported goods/services and of the project	<input checked="" type="checkbox"/>	Details of where additional information may be obtained	<input checked="" type="checkbox"/>
Other (please specify)	<input checked="" type="checkbox"/>		

**In case of a specific project name, we may also publish this under 'project description'**

(b) The language of the information released:

ECA language	<input type="checkbox"/>	English	<input checked="" type="checkbox"/>
Project language	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>

(c) Method of disclosure:

ECA website (please provide link below)	<input checked="" type="checkbox"/>	Other (please specify)	<input type="checkbox"/>
---	-------------------------------------	------------------------	--------------------------

[http://www.atradiusdutchstatebusiness.nl/publicaties/Publicatie\\_milieu\\_informatie/index.html](http://www.atradiusdutchstatebusiness.nl/publicaties/Publicatie_milieu_informatie/index.html)

(d) The minimum number of days the information should be made available prior to commitment: **30** days

(e) Details of any circumstances in which project information relating to Category A projects is not disclosed prior to commitment:

**We publish all Category A projects. In exceptional cases when project information relating to Category A project can not be disclosed, the justification for not disclosing project information will be discussed with our guardian authorities**

### Ex ante disclosure of environmental and social impact information

31. Please provide details of your policies and procedures for requiring that environmental and social impact information on Category A projects be made publicly available before a final commitment to grant official support, including

(a) Scope and content of information that should be released.

**Environmental and social impact information (e.g. ESIA report, summary thereof)**

(b) Language of the information released:

ECA language	<input type="checkbox"/>	English	<input type="checkbox"/>
Project language	<input checked="" type="checkbox"/>	Other (please specify)	<input type="checkbox"/>

(c) Method of disclosure:

Disclosure of documents by ECA	<input checked="" type="checkbox"/>	Via link on ECA website to additional information	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>		

(d) Minimum number of days the information should be made available prior to commitment: **30** days

(e) Details of any circumstances in which environmental and social impact information relating to Category A projects is not disclosed prior to commitment.

**We always disclose environmental & social impact information. In exceptional circumstances we may take into account the competitive context and/or constraints of business confidentiality when environment and social impacts information is disclosed.**



## Environmental and Social Survey

### REPORTING COUNTRY INFORMATION

**ESS-NLD-ATRADIUS (05-11-2015) version 2**

Reporting Country **Netherlands**

Submission Date **05 November 2015**

Reporting Institution **ATRADIUS**

Version number **2**

### Ex post disclosure

32. Please provide details of your policies and procedures for making available to the public information on projects classified in Category A and Category B for which you have made a final commitment to provide official support, including:

(a) Scope and content of information released:

(i) Project name	<input type="checkbox"/>	(x) Project location	<input checked="" type="checkbox"/>
(ii) Description of exported goods/services and of the project	<input checked="" type="checkbox"/>	(xi) Name of exporter	<input checked="" type="checkbox"/>
(iii) Name of buyer / project sponsor	<input checked="" type="checkbox"/>	(xii) Type of support	<input checked="" type="checkbox"/>
(iv) Repayment term	<input type="checkbox"/>	(xiii) Project credit volume	<input type="checkbox"/>
(v) Commitment date	<input type="checkbox"/>	(xiv) Category (A or B)	<input checked="" type="checkbox"/>
(vi) Reason for classification	<input type="checkbox"/>	(xv) Standards applied to the project	<input type="checkbox"/>
(vii) Key environmental and social factors / potential impacts	<input type="checkbox"/>	(xvi) Details of any conditions (including monitoring) applied	<input type="checkbox"/>
(viii) On-going monitoring reports	<input type="checkbox"/>	(xvii) GHG emissions of projects	<input type="checkbox"/>
(ix) Details of where additional information may be obtained	<input type="checkbox"/>	(xviii) Other (please specify)	<input checked="" type="checkbox"/>

**maximum indemnification**

(b) Language of the information released:

ECA language	<input checked="" type="checkbox"/>	English	<input type="checkbox"/>
Project language	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>

(c) Method of disclosure:

ECA website (please provide link below)	<input checked="" type="checkbox"/>	Other (please specify)	<input type="checkbox"/>
---	-------------------------------------	------------------------	--------------------------

<http://www.atradiusdutchstatebusiness.nl/publicaties/afgegevenpolissen/index.html>

(d) How often *ex post* information on projects classified in Category A and Category B is made publicly available:

**on-going basis**

**Ex-post information for Category A and B is disclosed after official support in granted**

(e) How long the information remains in the public domain:

**on-going basis**

**After information is disclosed is remains publicly available for about 5 yrs. All other ex-post information disclosed previously will be made available upon request**

(f) Details of any circumstances in which information on Category A and Category B projects is not disclosed after a final commitment is made:

33. Do you report and/or disclose publicly information on supported projects that do not meet the relevant aspects of the international standards against which they have been benchmarked?

**Yes**

If yes, please provide details:

Reported to the Working Group on Export Credits and Credit Guarantees (ECG)	<input checked="" type="checkbox"/>	Disclosed publicly on ECA website	<input type="checkbox"/>
Disclosed publicly on Guardian Authority's website	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>



## Environmental and Social Survey

### REPORTING COUNTRY INFORMATION

**ESS-NLD-ATRADIUS (05-11-2015) version 2**

Reporting Country **Netherlands**  
Submission Date **05 November 2015**

Reporting Institution **ATRADIUS**  
Version number **2**

### VII REPORTING AND MONITORING OF THE RECOMMENDATION

#### Accountability of your guidelines

34. Do you have appropriate measures and mechanisms in place to ensure compliance with your policies and procedures? **Yes**

If yes, please provide details, including (multiple answers may apply):

(i) ECA committee / board approvals <input checked="" type="checkbox"/>	(v) Guardian Authority(ies) approvals <input checked="" type="checkbox"/>
(ii) Internal audits <input type="checkbox"/>	(vi) Assurance provided by external parties <input type="checkbox"/>
(iii) Compliance Officer <input type="checkbox"/>	(vii) Complaint procedures <input type="checkbox"/>
(iv) Disclosure and reporting practices <input checked="" type="checkbox"/>	(viii) Other (please specify) <input type="checkbox"/>

#### Monitoring and evaluation

35. Do you have any policies and procedures in place for monitoring and evaluating your experience of the Recommendation at a national level? **Yes**

If yes, please provide details:

**Our Guardian Authorities have policies and procedures in place for monitoring and evaluation**

#### Sharing information

36. Do you have policies and procedures in place for sharing experiences with other Members? **Yes**

If yes, please provide details:

Ad hoc informal exchanges (email, telephone, etc.) <input checked="" type="checkbox"/>	Ad hoc bilateral / multilateral meetings <input checked="" type="checkbox"/>
Practitioners' events <input checked="" type="checkbox"/>	Other (please specify) <input type="checkbox"/>

#### Revisions of due diligence procedures

37. (a) When was the last review or update of your due diligence procedures conducted? (mm/yy) **08-2012**

(b) What was the motivation for the last review or update of your due diligence procedures?

**The revision of the Common Approaches 2012 and the revision of the IFC Performance standards in 2012**

(c) Are any modifications foreseen in the near future? **No**

If yes, please provide details:

**We will update our procedures when Common Approaches will be revised or when there will be modifications in national policies relevant to our due diligence procedure. We do not expect this in the near future**

When ? (mm/yy)

#### Resources

38. How many dedicated Practitioners work for your institution? **2**

#### Reporting

39. How frequently do you report *ex post* to the ECG, in accordance with paragraph 41 of the Recommendation, all Category A and Category B projects for which a final commitment has been issued? **on-going basis**

40. Do you produce any reports on environmental and social issues in addition to those required by the Recommendation? **Yes**

If yes, please provide details:

**We publish an annual sustainability report in which we describe our activities of that year, including policy updates, stakeholder engagement and an overview of executed E&S due diligence transactions**



## Environmental and Social Survey

### REPORTING COUNTRY INFORMATION

**ESS-NLD-ATRADIUS (05-11-2015) version 2**

Reporting Country **Netherlands**

Reporting Institution **ATRADIUS**

Submission Date **05 November 2015**

Version number **2**

### Additional measures

41. Have you adopted any additional measures for undertaking due diligence, consistent with the overall objectives of the Recommendation? **No**

If yes, please provide details:

### Applications not classified

42. Do you have policies and procedures in place for assessing the environmental and social risks associated with existing operations, including reviewing potential impacts and benchmarking against international standards? **Yes**

If yes, please provide details:

**We classify and review existing operations after screening concludes a review is necessary (see 7 above). We have a separate classification category for existing operations called "M". When operations are existing and not changing significantly we perform a reputational review (marginal review).**

43. Do you have policies and procedures in place for addressing environmental and social issues relating to exports of capital goods and/or services that are not destined to identified locations? **Yes**

If yes, please provide details:

**We classify and review moveable assets after screening concludes that a review is necessary (see 8). We have a separate classification category for moveable assets called "M". In case of a moveable asset we perform a reputational review (marginal review). In case of transactions with a higher risk (e.g. sensitive sector), we review a broader spectrum of parties involved and the first project destination (if known)**

### Applications not covered by the Recommendation

44. Do you have policies and procedures in place for addressing the environmental and social issues relating to exports of capital goods and/or services and the locations to which these are destined for officially supported export credits not covered by the scope of the Recommendation, *i.e.* with a repayment term of less than two years, for military equipment and agricultural commodities, for any applications exempt from screening as reported under Q3, etc.? **Yes**

If yes, please provide details:

**We classify and review applications with a repayment term shorter than 2 years and/or cash transactions**

### Additional comments

45. Please provide any additional comments.