

Environmental and Social Survey

REPORTING COUNTRY INFORMATION

ESS-DEU-EULER HERMES (26-04-2017) version 2

Reporting Country

Germany

Reporting Institution

EULER HERMES

Submission Date

26 April 2017

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.

Euler Hermes applies the Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence in its revised version as of June 2012. A specialized Sustainability Department with different experts i. a. carries out the environmental and social due diligence and monitoring of projects falling under the scope of the Recommendation and beyond, advises the guardian authorities, and undertakes disclosure and transparency exercises. Procedures and practices are based on the policies of the German Export Promotion Scheme and are determined by the decision making body of the Federal Government, an Interministerial Committee consisting of the Federal Ministry of Economics and Technology (lead function), the Federal Ministry of Finance, the Federal Foreign Office and the Federal Ministry of Economic Cooperation and Development. E&S issues are regularly communicated to exporters, financiers and CSO organizations through newsletters, brochures, workshops, trainings or face-to-face meetings. Euler Hermes actively contributes to inform the discussions at ECG Practitioners Meetings and fosters the exchange of expertise and experience.

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

<http://www.agaportal.de/en/main-navigation/exporte-exportkreditgarantien/verfahren-exportkreditgarantien/umwelt-sozialpruefung-exportkreditgarantien>

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)

☒

If information provided in the application form is not sufficient for screening, we would require further information from the applicant.

Responsibility for screening

5. Who is responsible for screening applications?

Underwriter

☒

Practitioner

☐

ECA Consultant

☐

Other (please specify)

☐

Practitioner may be involved in case of doubt or when deemed necessary.

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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:

It's the task of the Practitioners to assess, on the basis of the information given by the applicant, whether the undertaking is to be classified as a project or existing operation. To distinguish between those, it is taken into account if there is material increase in capacity or output and which environmental or social (negative or positive) impacts may be linked to the planned changes of an existing operation.

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

Yes

If yes, please provide details:

The application form contains a requirement to provide this information. Where appropriate, this information is checked by the Practitioner.

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

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

No

If yes, how do you classify such applications?

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:

In order to identify potential impacts of the projects, to which deliveries and services of an exporter are destined, Practitioners use several sources of information depending on the case. Examples are Environmental and Social Impact Assessment Reports where available, specific information required from and provided by the applicants, questionnaires, publicly available information, etc. The use of checklists, internal sources, and external sources of technical guidance (e.g. the Best Available Techniques (BAT) reference documents) is also helpful. Additionally, Practitioners use their professional expertise and experience drawn from former projects which is documented in our data base.

Responsibility for classification

10. Who is responsible for the classification of applications?

Underwriter

☐

Practitioner

☒

ECA Consultant

☐

Other (please specify)

☐

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

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(b) Any other comments:

As a rule, we rely on the review carried out by another ECA, if we are in a Reinsurer's position. Nevertheless, we will also conduct an own review, if appropriate.

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 apply a risk oriented approach taking also into account relevant circumstances, such as, but not limited to, availability of and access to information, leverage, timing and location and sector.

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:

Reviewing publicly reported cases and further information by the National Contact Point (NCP) made available to us is part of the due diligence process conducted by the Practitioner.

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:

In principle, we require an ESIA for Category A projects. In exceptional cases where there is no possibility to draw on a comprehensive report addressing all relevant aspects, we would ask for similar documentation / studies containing all relevant information for review. This may be in form of additional or gap reports by external consultants, questionnaires or other valid sources of information given by the applicants.

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 depth of the review depends on specific impacts and risks of the project. The information required might be contained in ESIA's, questionnaires adapted to the specific needs, other information given by the applicant, external reports / studies or other sources of information such as internal data bases and reports or publicly available data.

Responsibility for review

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

Underwriter

☐

Practitioner

☒

ECA Consultant

☒

Other (please specify)

☐

In principle, the Practitioner is responsible for undertaking the environmental and social review of the necessary information. In some cases an external consultant might be commissioned to look into specific issues or undertake the whole due diligence, especially for project finance and/or Category A projects.

Standards for benchmarking projects

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

Case-by-case approach, applicant has to confirm that relevant licences / permits required have been obtained. For Category A projects compliance with local standards is usually covered by the ESIA. Where appropriate, further information may be required from the applicant.

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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.

Default standards, i.e. when IFC/MFI not involved in project or when more stringent international standards (such as EU standards) not applied

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

Other (please specify)

(c) Multilateral Financial Institution (MFI) standards.

Where such institutions are supporting a project

(d) Any other comments:

To 18 (b): We would use IFC PS as benchmark standards in case of project finance projects or similar structured projects, when IFC/MFI/EPFI are involved in the project or if an ESIA according to IFC PS is available/was provided or the use of IFC PS is to the benefit of the applicant.

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 principle, cover won't be given for such transactions/projects. Therefore, we aim at finding solutions together with the applicant/buyer and maybe other parties involved to achieve compliance of the project with the standards against which it has been benchmarked. When appropriate in exceptional cases, cover might be granted when justified taking into account both the risks and the benefits of a project; justification will be provided in the reporting.

Site visits

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

(a) All projects

☐

(f) Project involves particularly complex/unusual potential impacts

☒

(b) Category A projects

☒

(g) Project located in or near sensitive area

☒

(c) Category A project finance transactions only

☐

(h) Project generating significant stakeholder interest

☒

(d) Category B projects

☒

(i) To verify project impact information provided

☒

(e) Project finance transactions

☒

(j) Other (please specify)

☐

Case-by-case approach, where appropriate, depending i.a. on risks/impacts.

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

☐

Practitioner

☐

Senior ECA staff

☐

ECA committee / board

☐

Guardian Authority(ies)

☒

Other (please specify)

☐

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

Due to the variety of projects, no standard statement can be given. However, for projects with material/significant negative impacts not eligible for mitigation or remedy (see also Question 19.), these impacts will form a significant aspect in decision making.

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(b) Please provide any examples of experience.

Specific projects in sensitive sectors (such as hydro power or pulp and paper) or in sensitive areas.

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.

Euler Hermes is a pure cover ECA, we do not offer direct lending facilities and we are not the contractual partner of the buyer. Conditions will, where appropriate, be documented in the cover decision (offer of cover in principle or final commitment) and/or the loan or export contract documentation. Often, conditions to be met in order to abide by the reference standards for example are already addressed during the review process and would then be seen as stated facts and not be formally documented as conditions.

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

Monitoring, carrying out an Environmental Social and Action Plan, specific mitigation measures such as emission reduction via a filter installation, ESIA amendments.

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)

☐

Regularly in Category A project finance and when cover decision subject to conditions; apart from that where appropriate (see above).

(b) Monitoring frequency/period:

(i) during construction:

other (please specify)

(ii) during operation:

other (please specify)

(c) Content:

Case-by-case approach.

(d) Any other comments:

To 24 (b): The monitoring frequency/period depends on the project. Often, frequency is semi-annually during construction and yearly during operation, or at time of fulfillment of conditions, incident reporting on material aspects.

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):

☒

In principle, the Practitioner is responsible for undertaking the monitoring of projects. In some cases an external consultant might be commissioned to look into specific issues, especially for project finance and/or Category A projects. However, the overall responsibility for the monitoring lies with the Practitioner.

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Non-compliance measures

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

Intensive consultations in order to restore compliance with relevant conditions; in specific cases using, where appropriate, documented remedy measures such as cure periods, mandatory pre-payment, stop of draw-downs.

(b) Please provide any examples of experience.

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

☐

(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) Where project not in compliance with support

☐

(v) Project finance transactions

☐

(x) None

☐

(xi) Any other (please specify)

☐
☐

(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

☐

(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) Where project not in compliance with support

☐

(v) Project finance transactions

☐

(x) None

☐

(xi) Any other (please specify)

☐
☐

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? If yes, please provide details:

Yes

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

Ad hoc informal exchanges (email, telephone, etc.)

☒

Ad hoc bilateral / multilateral meetings

☒

Practitioners' events

☒

Other (please specify)

☐

Observing legal constraints, Euler Hermes fosters the exchange of information, in particular among the ECAs.

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(b) competitive situations:

Ad hoc informal exchanges (email, telephone, etc.)

☒

Ad hoc bilateral / multilateral meetings

☒

Practitioners' events

☐

Other (please specify)

☐

See above.

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

☒

Project location

☒

Description of exported goods/services and of the project

☒

Details of where additional information may be obtained

☒

Other (please specify)

☐

(b) The language of the information released:

ECA language

☒

English

☒

Project language

☐

Other (please specify)

☐

(c) Method of disclosure:

ECA website (please provide link below)

☒

Other (please specify)

☐

<http://www.agaportal.de/en/main-navigation/exporte-exportkreditgarantien/praxis-exportkreditgarantien/projektinformationen-exportkreditgarantien>

(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:

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.

ESIA and/or other reports/studies

(b) Language of the information released:

ECA language

☒

English

☒

Project language

☐

Other (please specify)

☒

Project description is in German and English. The environmental and social information itself in the language of the relevant documents (see question 31 a).

(c) Method of disclosure:

Disclosure of documents by ECA

☒

Via link on ECA website to additional information

☒

Other (please specify)

☐

(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.

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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 checked="" 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 type="checkbox"/> |
| (iii) Name of buyer / project sponsor | <input type="checkbox"/> | (xii) Type of support | <input type="checkbox"/> |
| (iv) Repayment term | <input type="checkbox"/> | (xiii) Project credit volume | <input checked="" 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 checked="" type="checkbox"/> |
| (vii) Key environmental and social factors / potential impacts | <input checked="" 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 type="checkbox"/> |

Euler Hermes discloses basic project information of any project (regardless of any environmental classification) above the threshold of EUR 15 million covered contract value after final commitment (name of exporter, contract value in categories, buyer country, credit period) subject to the consent of the applicant. This information is brought up to date each month and can be accessed at our website: <http://www.agaportal.de/en/main-navigation/exporte-exportkreditgarantien/praxis-exportkreditgarantien/projektinformationen-exportkreditgarantien>. Furthermore, selected projects are illustrated in more detail, even if they are below the aforementioned threshold. Furthermore, a list of all transactions having been reported to the OECD under the Common Approaches regime has been made available containing more detailed information such as the standards benchmarked against, justifications in case standards could not be met etc. All information remains available on the website (archive).

(b) Language of the information released:

- | | | | |
|------------------|-------------------------------------|------------------------|-------------------------------------|
| ECA language | <input checked="" 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.agaportal.de/en/main-navigation/exporte-exportkreditgarantien/praxis-exportkreditgarantien/projektinformationen-exportkreditgarantien>

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

on-going basis

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

indefinitely

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

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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 checked="" type="checkbox"/> |
| Disclosed publicly on Guardian Authority's website | <input type="checkbox"/> | Other (please specify) | <input type="checkbox"/> |
- See question 32.a).

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 checked="" type="checkbox"/> | (vi) Assurance provided by external parties | <input checked="" type="checkbox"/> |
| (iii) Compliance Officer | <input checked="" type="checkbox"/> | (vii) Complaint procedures | <input checked="" type="checkbox"/> |
| (iv) Disclosure and reporting practices | <input 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:
- Regular evaluation with guardian authorities on policies and procedures applied. NGO and CSO meetings. Hearings in Parliamentary Committees.

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 checked="" type="checkbox"/> |
- Workshops and trainings for other ECAs.

Revisions of due diligence procedures

37. (a) When was the last review or update of your due diligence procedures conducted? (mm/yy) 01-2013
- (b) What was the motivation for the last review or update of your due diligence procedures?
- Adoption of revised Common Approaches in June 2012.
- (c) Are any modifications foreseen in the near future? No
- If yes, please provide details:
-
- When ? (mm/yy)

Resources

38. How many dedicated Practitioners work for your institution? 10

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
-

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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:

Information on sustainability issues and project data forms a part of the export credit guarantees' annual report released by the Federal Ministry of Economics and Technology.

Additional measures

41. Have you adopted any additional measures for undertaking due diligence, consistent with the overall objectives of the Recommendation?

Yes

If yes, please provide details:

In general, we pursue a risk-orientated "watchful eye" approach. In particular, for export credits with a repayment term of less than two years, transactions connected to projects that might have high environmental/social and/or reputational risks will be reviewed and classified into an internal category. This mainly accounts for projects that (i.) would have been categorized as a category A project in case of medium/long credit terms, (ii.) belong to a sensitive/risk sector (such as pulp and paper, dams and mining) or (iii.) comprise turnkey delivery of large plants above EUR 50 million. Moreover, all other projects would be assessed and reviewed if we got clear information/hints that the project might/will have critical major environmental/social impacts.

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 pursue a risk-orientated approach when reviewing existing operations.

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:

In principle, no further review. But where appropriate, risk-orientated review.

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:

See answer to question 41.

Additional comments

45. Please provide any additional comments.