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

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?				Elaboration for "other" answers and/or any additional comments/clarifications:
Australia	Enhanced due diligence is undertaken	X	always	Refer comments under Question 9.
	Other	X	always	
Austria	Enhanced due diligence is undertaken	X	always	
	Other			
Belgium	Enhanced due diligence is undertaken	X	always	
	Other			
Canada	Enhanced due diligence is undertaken	X	always	
	Other			
Czech Republic (EGAP)	Enhanced due diligence is undertaken	X	always	
	Other			
Czech Republic (CEB)	Enhanced due diligence is undertaken	X	always	
	Other			
Denmark	Enhanced due diligence is undertaken	X	always	
	Other			
Finland	Enhanced due diligence is undertaken	X	always	
	Other			
France	Enhanced due diligence is undertaken	X	always	
	Other			
Germany	Enhanced due diligence is undertaken	X	always	
	Other			
Greece	Enhanced due diligence is undertaken			The final decision to provide support is withheld pending the outcome of the legal process. There will also be a co-operation with the Ministry of Justice.
	Other	X	always	
Hungary (MEHIB)	Enhanced due diligence is undertaken	X	always	
	Other			
Hungary (Eximbank)	Enhanced due diligence is undertaken	X	always	
	Other			
Italy	Enhanced due diligence is undertaken	X	always	
	Other			
Japan (JBIC)	Enhanced due diligence is undertaken	X	always	
	Other			
Japan (NEXI)	Enhanced due diligence is undertaken	X	always	
	Other			
Korea (Eximbank)	Enhanced due diligence is undertaken	X	always	
	Other			
Korea (KEIC)	Enhanced due diligence is undertaken	X	always	
	Other			
Luxembourg	Enhanced due diligence is undertaken	X	always	
	Other			
Mexico	Enhanced due diligence is undertaken			If Bancomext becomes aware of such charge in any national court, the application for credit or support is considered null and void.
	Other	X	always	

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

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?				Elaboration for "other" answers and/or any additional comments/clarifications:
Netherlands	Enhanced due diligence is undertaken	X	always	
	Other			
New Zealand	Enhanced due diligence is undertaken	X	always	Similar process as for Question 9.
	Other			
Norway	Enhanced due diligence is undertaken	X	always	
	Other			
Poland	Enhanced due diligence is undertaken	X	always	
	Other			
Portugal	Enhanced due diligence is undertaken	X	always	
	Other			
Slovak Republic	Enhanced due diligence is undertaken	X	always	No experience.
	Other			
Spain	Enhanced due diligence is undertaken	X	always	
	Other			
Sweden	Enhanced due diligence is undertaken	X	always	
	Other			
Switzerland	Enhanced due diligence is undertaken	X	always	
	Other			
Turkey	Enhanced due diligence is undertaken	X	always	
	Other			
United Kingdom	Enhanced due diligence is undertaken	X	always	
	Other			
United States (EXIM)	Enhanced due diligence is undertaken	X	always	
	Other			
United States (USDA)	Enhanced due diligence is undertaken	X	always	If the exporter is applying for the first time we will hold his application pending the results of the enhanced due diligence review.
	Other			

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

Question 10 (continued):

If enhanced due diligence is undertaken: a) Does the enhanced due diligence process include, inter alia, verification that the exporter/applicant has in place appropriate management control systems that combat bribery?		b) How is the application treated?			Elaboration for "other" answers and/or any additional comments/ clarifications:
Australia	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Austria	Yes, sometimes	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	We would require further details about the reasons for the charge and might also ask for information about measures the exporter/applicant has taken if any.
		No fixed policy.			
		Other			
Belgium	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	See disclosure procedure under Question 8. When ONDD has general information (not on a specific case, but for example press rumours on an exporter), ONDD asks questions to the exporter but a specific case is not suspended if there is no need for it.
		No fixed policy.			
		Other			
Canada	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Czech Republic (EGAP)	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Czech Republic (CEB)	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Denmark	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Finland	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
France	Yes, sometimes	The approval of the application is suspended pending the outcome of the enhanced due diligence	X	always	Cf. Question 9.
		No fixed policy.			
		Other			

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

Question 10 (continued):

If enhanced due diligence is undertaken: a) Does the enhanced due diligence process include, inter alia, verification that the exporter/applicant has in place appropriate management control systems that combat bribery?		b) How is the application treated?			Elaboration for "other" answers and/or any additional comments/ clarifications:
Germany	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Greece	No	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Hungary (MEHIB)	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Hungary (Eximbank)	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Italy	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Japan (JBIC)	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Japan (NEXI)	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Korea (Eximbank)	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Korea (KEIC)	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			

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

Question 10 (continued):

If enhanced due diligence is undertaken: a) Does the enhanced due diligence process include, inter alia, verification that the exporter/applicant has in place appropriate management control systems that combat bribery?		b) How is the application treated?			Elaboration for "other" answers and/or any additional comments/ clarifications:
Luxembourg	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Mexico		The approval of the application is suspended pending the outcome of the enhanced due diligence process.			
		No fixed policy.			
		Other			
Netherlands	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
New Zealand	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Norway	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Poland	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Portugal	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	We would require further details about the circumstances of the case.
		No fixed policy.			
		Other			
Slovak Republic	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	No experience until now. In case that an exporter and, where appropriate, applicant (or anyone acting on their behalf in connection with the transaction) will be under charge in a national court for violation of laws against bribery of foreign public officials of any country due diligence process will include verification that the exporter/ applicant has in place appropriate management control systems that combat bribery.
		No fixed policy.			
		Other			

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

Question 10 (continued):

If enhanced due diligence is undertaken: a) Does the enhanced due diligence process include, inter alia, verification that the exporter/applicant has in place appropriate management control systems that combat bribery?		b) How is the application treated?			Elaboration for "other" answers and/or any additional comments/ clarifications:
Spain	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Sweden	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Switzerland	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
Turkey	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
United Kingdom	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
United States (EXIM)	Yes, always	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			
United States (USDA)	Yes, sometimes	The approval of the application is suspended pending the outcome of the enhanced due diligence process.	X	always	
		No fixed policy.			
		Other			