

PRIVATE & CONFIDENTIAL

21 November 2005

Ben Llewellyn
Export Credits Guarantee Department
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Harbour Exchange Square
London E14 9GS

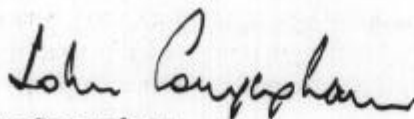
Dear Mr Llewellyn

Re: Consultation on ECGD's anti-bribery and corruption procedures introduced in December 2004

I am writing to respond to the ECGD's request for comments on its response to consultation on the above procedures. In our earlier submission, we said that applicants' "refusal to provide the name and address of an agent – even on a confidential basis to a government agency – is an obvious 'red flag'", and we did not think that applicants should have this option. I understand that the ECGD is now again seeking opinions on that particular point.

We stand by our earlier view. Whilst noting the central importance of confidentiality, we regard the provision of agents' names as an essential part of ECGD's review process. The fact that the ECGD does not "have statutory powers of search or arrest" (in the words of the consultation document) need not preclude it – or any commercial entity - from commissioning further due diligence enquiries if it believes this to be appropriate.

Yours Sincerely

John Conyngham
Director