



# Rolls-Royce

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14<sup>th</sup> December 2005

Dear Ben,

## **Interim Response to ECGD's Consultation on Changes to its Anti-Bribery and Corruption Procedures: Qualification of Statements**


Thank you for your letter of 5<sup>th</sup> December 2005 with respect to the above. We covered our concern regarding absolute statements in our response to you dated 18<sup>th</sup> November 2005 as follows:

“Although the change was not highlighted in ECGD's covering note the qualification “to the best of our knowledge and belief” has been deleted in the revised documentation making all statements absolute. It is not practical for us to make such unqualified statements particularly where they are in respect of third parties where we would be relying upon the representations of others. The phrase should be reinserted in all the relevant places throughout the documentation. Alternatively the qualification “as far as you are aware”, used in Annex C3, paragraph 12.4, would also be acceptable.”

We have not changed our view on this issue. To give you just one example of the impact of the global deletion of the qualifying words, the first sentence of Annex C(i)B now requires that “All relevant questions in this Schedule must be answered fully and truthfully” and the qualification “to the best of our knowledge and belief” that had appeared at the end of that sentence has been deleted. It is impossible for us to state absolutely that all questions have been answered ‘fully’ as we could not claim to have ‘full’ knowledge of every aspect of every question.

It is essential that the qualifying language, together with the explanatory notes relating to that language, be re-inserted.

Yours sincerely

A handwritten signature in black ink, appearing to read "Sue M. Walton". The signature is fluid and cursive, with a large initial "S" and a distinct "W" at the end.

Sue M. Walton  
General Manager  
Structured Finance & Export Credit