



Rolls-Royce

Rolls-Royce Capital Limited
65 Buckingham Gate, London SW1E 6AT, England
Telephone: +44 (0) 20 7227 9100
Fax: +44 (0) 20 7227 9050
www.rolls-royce.com

Ben Llewellyn
PO Box 2200
2 Exchange Tower
Harbour Exchange Square
London
E14 9GS

27th April 2006

Dear Ben,

**Revisions in Standard Documents Relating to Bribery and Corruption:
Representations About Proposed Arrangements for Handling Information
About Agent's Identities**

In accordance with the request contained in Annex D of the Government's Final Response to the Public Consultation on Revisions in ECGD's Standard Documents Relating to Bribery and Corruption, please find below our comments on the proposed safe handling arrangements as outlined in Annex C of that document.

First, Rolls-Royce recognises and appreciates the efforts which ECGD have made to address concerns on this issue. The Company continues to be fully supportive of ECGD's aims and objectives to strengthen controls to prevent bribery and corruption.

The detailed response submitted by the CBI to the proposed safe handling arrangements also reflects the views of this Company but there are some points, which we would specifically like to draw to your attention.

- It is our position that ALL information with respect to Agents should be subject to the safe handling provisions and that the proposals should not be confined to the name and address of the Agent. The amount paid to an Agent and the services provided by that Agent are equally as commercially confidential as the identity of the Agent and should be afforded the same level of protection. It is however acknowledged that if the Agent's commission is to be included in ECGD's calculation of foreign content then it should continue to be disclosed on the face of the Application Form.
- We understand that only the Head of the Business Principles Unit ("BPU") will have access to the information and that if the Head is unavailable to deal with a particular Application, that the Deputy Head of the BPU will be the only person to have access.



Rolls-Royce

- Only one hard copy of the information will be held by ECGD and this will be stored in a secure location accessible only by the Head or Deputy Head of the BPU, depending on which of them had initially received the information. In our view the files should be clearly marked as “Commercial in Confidence”.
- It is understood that ECGD will ask permission of the Applicant before any enquiries are made in respect of an Agent. The Applicant may refuse consent but ECGD will then have the right to refuse support for the transaction. As it is in both parties interest to pursue any suspicion of wrongdoing, we would suggest that ECGD share the information and results of any enquiry so that any appropriate action may be taken at the earliest opportunity.
- We understand that ECGD treats all of the information provided to it in Applications as commercial and confidential. We would appreciate a formal acknowledgement of this, perhaps on the face of the Application Form.
- In the interests of ensuring that any future amendments or alterations to the proposed practices are capable of being implemented effectively, it is recommended that ECGD consult with all interested parties about proposed changes. There should also be ‘grandfathering’ arrangements for transactions already in process.

In conclusion, we think that the procedures set out in Annex C of the Final Response are workable provided that account is taken of the comments contained both here and in the CBI’s response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sue M. Walton'.

Sue M. Walton
General Manager
Structured Finance & Export Credit