



Sustainability Report 2014

Atradius Dutch State Business

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Foreword

2014 was a good year for Atradius Dutch State Business. We received a high volume of applications and also issued a high volume of policies. An environmental and social impact assessment was obligatory for 38 applications and these assessments were completed as required. Many assessments were lengthy and complex.

The major milestone in 2014 was the launching of a new fund for providing export credit insurance and export finance: the Dutch Good Growth Fund (DGGF). In 2013 consultations started with the Ministry of Foreign Affairs to determine the conditions for this new fund which focuses on projects relevant to the development of emerging economies and developing countries. Atradius Dutch State Business processes the applications for the DGGF and completes an environmental and social review for each application. The fund started operations on 1 July 2014 and we have meanwhile processed many applications for transactions which are relevant for the development of the recipient countries.

2014 was also characterised by the attention our export credit facility and in particular our environmental and social impact assessment received in the political arena and from the general public. Atradius Dutch State Business took this as an opportunity to give presentations explaining our activities in several fora. In 2014 various NGOs requested us to provide feedback and information for their publications.

In 2015 we will do our utmost to conduct high quality environmental and social reviews. In our reviews we endeavour to assess as accurately as possible the risks of damage to the environment or habitat due to projects which we have supported by providing export credit insurance. This assessment is one of our priorities when determining whether to underwrite risks related to export transactions or investments abroad. In 2015 we will also continue to expand our expertise in the field of development objectives with regard to projects supported by the DGGF.

Bert Bruning
Managing Director
Atradius Dutch State Business NV
June 2015

Organisation and policy

Atradius Dutch State Business and the Atradius Group

Atradius Dutch State Business is part of the Atradius Group. The Atradius Group corporate social responsibility (CSR) policy also applies to Atradius Dutch State Business. In 2008 the Group endorsed the ten principles of the *United Nations Global Compact* initiative (www.unglobalcompact.org). As a signatory, Atradius recognises that human rights, working conditions, the environment and combating corruption are part of the strategy, culture and day-to-day management of the company and that it will act accordingly. Atradius Dutch State Business actively participates in the Atradius Group working group established to continue taking further steps in corporate social responsibility.

In 2014 the working group started developing a materiality matrix. This matrix will display the most important corporate social responsibility issues for Atradius in their order of importance for internal and external stakeholders. As an agency for Dutch state facilities, Atradius Dutch State Business also has its own responsibilities with regard to sustainability.

Atradius Dutch State Business and the Dutch State

Atradius Dutch State Business manages the Dutch state's export credit insurance programme and foreign investment scheme in accordance with the *Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence* (known as the *Common Approaches*) agreed in the OECD.

The Dutch state, in co-operation with Atradius Dutch State Business, established a national policy document incorporating the international agreements made in the *Common Approaches* and supplementary Dutch policy agreements. This policy document focuses mainly on the review of the environmental and social impact of export transactions and foreign investments.

We also have policies on transparency, sustainable lending and deterring bribery. We expect exporters to be familiar with the OECD guidelines for multi-national enterprises and to do their utmost to comply with them. For more information on how Atradius promotes and stimulates corporate social responsibility in its day-to-day business,

please refer to our policy document (in Dutch) and our brochure on corporate social responsibility, both available on our website.

International developments

When the OECD policy group for export credit insurance, the Export Credit Group (ECG), revised the *Common Approaches* in 2012, it also gave a mandate to the environmental and social specialists of the Export Credit Agencies (ECAs, the national export credit agencies). In 2014, as part of this mandate, the specialists worked on improving the screening and assessment of project-related human rights issues as well as on other matters such as the evaluation of existing projects. An example of a project-related human rights issue is the use of child labourers in projects. A case in which an existing project may need to be evaluated is, for example, when a processing line is to be replaced in an existing factory which itself is not to be expanded.

The environmental and social specialists reported their progress on project-related human rights issues as well as on the registration of greenhouse gas emission levels to the Export Credit Group in June 2014. They will report on other issues in 2015.

Monitoring

In 2013 Atradius Dutch State Business issued, for the first time, a policy subject to monitoring requirements under regulations agreed in the revised *Common Approaches*. This was for a project with potential major adverse environmental or social impacts (category A project) financed through project finance. As required by the revised *Common Approaches*, the project will be monitored for the entire period of cover. Category A projects are often large-scale projects in which export credit agencies in other countries and banks are also involved. Atradius Dutch State Business will cooperate fully with all parties so that project monitoring will be well coordinated. The purpose of monitoring is to closely follow a project's performance with regard to its environmental and social aspects and to search for a solution together with all parties in the event of any issues. In 2014 we started monitoring a project for the first time (see boxed text below).



Aerial photograph of the Ichthys LNG plant near Darwin, Australia, early 2014

Monitoring the environmental and social aspects of projects - In 2014 Atradius Dutch State Business started the first monitoring procedure for a policy issued for a transaction which was classified as having a potential major adverse environmental or social impact (category A project) and which was financed on a project-finance basis. This was required by the Common Approaches as revised in 2012. The rules laid down in the Common Approaches stipulate that the environmental and social impact of this project must be monitored for the entire period of cover. This basically means that during its execution, the project will be closely followed to verify whether the commitments made at the time of the project's environmental and social impact assessment prior to the issue of the insurance policy are indeed being honoured.

The venture concerned is an LNG (liquefied natural gas) project in Australia. Two Dutch companies working on the project are covered by the insurance policy which Atradius Dutch State Business issued for the project financing. The seven export credit insurance agencies cooperating on this project have hired an independent consultant to monitor it. In 2014 the consultant submitted two monitoring reports on the progress of the project and its adherence to the IFC Performance Standards for Social and Environmental Sustainability. These are standards developed by the World Bank Group (which includes the IFC) for assessing projects.

Atradius Dutch State Business and the other credit insurance agencies participating in the project, accompanied the consultant on their visit to the project site from 10-13 March 2014. The objective of the visit was to see at first hand whether the project was proceeding according to plan and to evaluate the consultants work. The visit to the site focused on how management plans were being implemented and whether the environmental, health and safety commitments made prior to the start of the project are being honoured. The visit will also result in a clearer understanding of future monitoring reports.

Several project staff members gave presentations on the overall state and specific elements of the project. A visit was paid to the site of the plant (see photograph) and the village where some of the temporary workers are being housed during the project's construction phase. Meetings were held, including with local inhabitants. In a final meeting the consultant presented his initial conclusions. After the visit, our final conclusion, and that of the other export credit insurance agencies as well as of the consultant, was that to date this project is being managed well.

Anti-bribery and corruption procedures

The Dutch state and Atradius Dutch State Business wish to prevent export orders being secured through bribery. Apart from its criminal aspects, bribery also harms a country's economic development. The OECD *Recommendation on Bribery and Officially Supported Export Credits*, adopted in 2006, accords priority to deterring bribery in connection with export transactions supported by official export credit agencies. By adopting the *Recommendation*, OECD member countries agreed on appropriate measures against bribery; the *Recommendation* describes what these measures must entail. Atradius Dutch State Business does not want to be associated in any way with transactions involving bribery. If there are any indications of bribery in the broadest sense of the word, Atradius Dutch State Business is obliged to investigate.

It is not only the exporter, but also his agent who may commit bribery. An obstacle for an applicant to obtaining insurance cover may also be a main contractor who has not applied for cover but about whom there are well-founded suspicions that he is involved in bribery. Atradius Dutch State Business asks for information about agents' commissions on its application forms. In our insurance policies we furthermore refer to the penalties for bribery, being the loss of the right to indemnification and possibly, criminal prosecution.

In 2014 we screened all applications for any indications of bribery. There were no applications for transactions where there were any well-founded suspicions of bribery.

Sustainable lending policy

In 2008 the OECD concluded agreements on sustainable lending to low-income countries. The purpose of these agreements is to ensure that government support for export credits is used for transactions which benefit a country's development and that our export credit insurance complies with the IMF and World Bank sustainable lending policy for low-income countries. In practice this means that transactions with low-income countries where the payment obligation ultimately lies with the central government must include aid or be in accordance with the IMF and World Bank sustainable lending policy. Aid may take the form of a loan on concessional terms or a grant

for part of the contract sum. In 2014 we insured, for account of the Dutch State, various transactions which were partially financed with official development aid.

In 2014 the IMF and the World Bank started examining whether recipient countries should take more responsibility for sustainable lending policies. The IMF's new policy for sustainable lending took effect on 1 June 2015.

Transparency and relationship with stakeholders

Atradius Dutch State Business engages with five groups of stakeholders on matters pertaining to environmental and social reviews and policy developments (see figure 1).

Mandate

Firstly, we frequently consult with the Dutch state (represented by the Ministry of Finance and Ministry of Foreign Affairs) who gave us our mandate. In addition to advising the Ministries on policy issues, we coordinate our procedures with them. They review our work.

In 2014 the most significant development in our cooperation with the government was the launching of the Dutch Good Growth Fund, for which the Ministry of Foreign Affairs has given Atradius Dutch State Business the mandate (see boxed text). Our mandate for regular export credit insurance comes from the Ministry of Finance which in turn consults with the Ministry of Foreign Affairs.

In the spring of 2014 we held a two-day introductory

course for new central government staff on export credit insurance in which we also dealt with the environmental and social review process. We furthermore held extra introductory courses for staff at the ministries we work with.

Figure 1: Stakeholders



Dutch Good Growth Fund - The Dutch Good Growth Fund (DGGF) was launched on the 1st of July 2014. The DGGF is a fund established by the Ministry of Foreign Affairs to provide funding and credit insurance to enterprises and investment funds in the Netherlands and in low- and middle-income countries in support of development-related investments in and export transactions for designated countries. The fund may be of help when mainstream market players are unable to provide funding and/or credit insurance. The fund comprises three tracks:

1. Financial support for Dutch small and medium-sized enterprises (SMEs) and banks which wish to invest in countries eligible for DGGF support. This segment is managed by the Netherlands Enterprise Agency (Rijksdienst voor Ondernemend Nederland).
2. Financial support for local SMEs and banks which wish to invest in eligible countries. This segment is managed by PWC and Triple Jump.
3. Export credit insurance and export finance for transactions with eligible countries. This segment is managed by Atradius Dutch State Business.

Atradius Dutch State Business carries out its work for the DGGF largely in the same way as it does for the regular export credit insurance programme. There are however special requirements for DGGF transactions, most of which are related to environmental and social reviews. As the DGGF's objective is to provide support specifically for projects which are relevant for a country's development, DGGF transactions must be related to projects which benefit the communities in which they are located. In the first place they must provide employment and encourage primarily women and young entrepreneurs to participate in the job market and develop their skills. Furthermore, they must transfer knowledge to the local population and expand local production capacity. As the Ministry of Foreign Affairs aims to provide aid which is relevant for the development of the recipient country, strict requirements have been set for various aspects of the environmental and social review.

Government stakeholders

In 2014 Atradius Dutch State Business's activities received considerable attention in the political arena and from the general public. In connection with the DGGF, we visited Minister Ploumen for Foreign Trade and Development Cooperation to make each other's acquaintance. A delegation from the Parliamentary Standing Committee on Finance paid a working visit to our offices in Amsterdam. Subsequently a team from Atradius Dutch State Business made a presentation to the Parliamentary Standing Committee on Foreign Trade and Development Cooperation in The Hague.

Clients

We naturally also maintain good contacts with our clients: the exporters and banks we insure. In 2014 our services included holding our introductory course for them twice. Atradius Dutch State Business organises these introductory courses to explain export credit insurance procedures to employees of new clients and to new employees of existing clients. The courses also deal with the environmental and social aspects of export transactions.

Co-operation with Dutch and international partners

Atradius Dutch State Business's environmental and social specialists maintain a network of partners who also conduct environmental and social reviews. These include the environmental and social specialists of the other export credit agencies in the OECD, banks which adhere to the Equator Principles¹, and the IFC/World Bank.

If development co-operation is involved, we coordinate our activities with the Netherlands Enterprise Agency (Rijksdienst voor Ondernemend Nederland: RVO.nl). In 2014 our relationship with the agency broadened to include the coordination of DGGF activities. We also consult on DGGF matters with PWC and Triple Jump who are responsible for managing the second track of the DGGF. In addition, we maintain contact with the Netherlands National Contact Point OECD Guidelines (NCP). Our specialists participate in meetings with these partners but also initiate contacts with them whenever there are opportunities for co-operation and coordination.

In 2014 three international meetings were held with the environmental and social specialists of the export credit agencies of the other OECD member countries. In 2014, just as in 2013, the specialists devoted much attention to improving the screening and review of project-related human rights issues. They also prepared their recommendations for the reporting of greenhouse gas emission levels. Several other topics were discussed, including the ability of an insurer to exert its influence (i.e. to steer and control other parties), the application of the IFC Performance Standards, the guidelines for power plants (including coal-fired and nuclear power plants), animal welfare (see boxed text) and co-operation with the financial sector and NGOs. Export credit insurers recognise that their ability to exert influence on or to steer or control other parties involved in the transactions they have insured are limited, given that they are not directly involved in the execution or financing of a project.

1 The Equator Principles include elective guidelines developed by banks for managing social and environmental issues related to project finance transactions.

Animal Welfare - Animal welfare is a topical issue internationally as well as in the Netherlands. Atradius Dutch State Business follows the guidelines of the IFC and is part of a wide international knowledge network in the field of corporate social responsibility (CSR). Animal welfare receives ample attention in various fora, partly as a result of Atradius Dutch State Business's efforts in this field.

Animal welfare is not a new topic on the agenda. We have already been working internationally with export credit insurance agencies in other OECD countries for a number of years to improve current standards and to apply them in the environmental and social review conducted for export transactions. By co-operating with other insurers we are also working on creating a level playing field and eliminating any competitive advantages or disadvantages due to the application of lower or higher standards in project reviews.

Atradius Dutch State Business has reporting obligations to various international bodies. In three of the mandatory reports we must include information about our environmental and social reviews. Those completed for Category A and B projects are the most important, and, after issuing an insurance policy for such projects, we must report to the OECD on how we conducted the reviews. In 2014 we also reported to the European Union in accordance with our reporting obligations under EU Regulation 1233/2011. Via a questionnaire we also reported to the Berne Union. This is an international organisation of private and public sector export credit and investment insurers.

We also consult with non-governmental organisations (NGOs). Last year we had several contacts with various NGOs on an ad-hoc basis. We were usually asked to complete questionnaires or to give feedback on reports they sent us. We respond to such requests without of course divulging any confidential information. If deemed useful or advisable, we will enter into a dialogue with certain parties.

Lastly, the Ministry of Finance organises an annual stakeholder meeting for industry organisations, NGOs and trade unions. In 2014 this meeting was held in February. At the meeting, the Ministry of Finance gave a presentation on the international playing field in which we operate. Atradius Dutch State Business environmental and social specialists gave a presentation on our reporting obligations and our commitment to transparency.

In 2013 the IFC started revising its *IFC Industry Sector Environmental, Health, and Safety Guidelines*. These guidelines were established for specific sectors and can be used to review the environmental, health and safety aspects of projects in these sectors. The Common Approaches as revised in 2012 stipulate that, if relevant, projects must be reviewed to determine whether they comply with these sector guidelines as well as with the general IFC Performance Standards. We therefore regularly refer to these guidelines. Two rounds of revisions have meanwhile taken place, each resulting in amendments to a number of guidelines. As a user of these guidelines, we also submitted suggestions for amendments. In 2014 there were no discussion rounds on new topics which

were relevant for us. There were however new discussion rounds on two relevant ongoing topics which resulted in some of our suggestions for amendments in 2013 being incorporated in the new versions of the *IFC Industry Sector Environmental, Health, and Safety Guidelines*.

Transparency

In accordance with the ex-ante publication procedure required by the Common Approaches, we publish all category A projects on our website for 30 days before issuing an insurance policy. Category A projects are those with major potential adverse environmental or social impacts. The publication procedure enables third parties to request information about the project or to provide us information which could be relevant for the environmental and social review. Furthermore, after issuing an insurance policy, we publish the key data for the relevant transaction on our website. The lists of policies issued up to and including 2014, along with the classification of the environmental and social review, are available (in Dutch only) on our website.

Outlook

At this time we do not expect that in 2015 there will be any major developments concerning environmental and social reviews. We will continue to expand our expertise in this field with regard to development-relevant trade and investment transactions supported by the Dutch Good Growth Fund (DGGF).

As mentioned earlier, we will be submitting our second report to the OECD on our mandate for conducting environmental and social reviews. The Export Credit Group (ECG) of the OECD will then decide whether to draw up a new mandate or amend the current *Common Approaches*. Human rights in particular will remain high on the agenda.

In 2015 we will of course continue to communicate with our partners, clients and NGOs; our objective being to continually develop our review procedures.

Environmental and social review of insurance applications

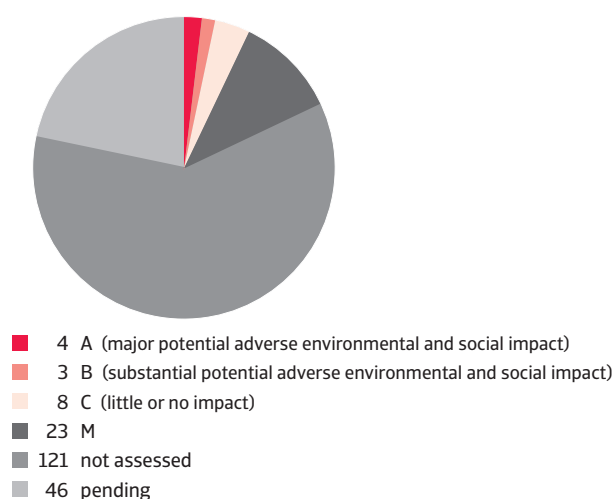
Procedure

Atradius Dutch State Business screens all applications for export credit insurance and foreign investment insurance in order to determine whether an environmental and social review is required. In our screening process we look at the size of the transaction and whether a vulnerable region or sector is involved. The screening and review procedures agreed in the OECD are stated in the *Common Approaches*. The agreements made in the *Common Approaches* have been developed further in a Dutch policy document on reviewing environmental and social aspects of projects (*Milieu en Sociale Beoordeling, 2012*) drawn up by the Ministries of Finance and Economic Affairs² and Atradius Dutch State Business. The screenings, classifications and reviews are conducted by Atradius Dutch State Business's environmental and social specialists.

Content

Atradius Dutch State Business tries to avoid covering unacceptable social or environmental risks. In order to identify such risks and exclude them from our cover, we assess applications according to the *IFC Performance Standards for Social and Environmental Sustainability*. These were developed by the World Bank Group for the projects they finance around the world.

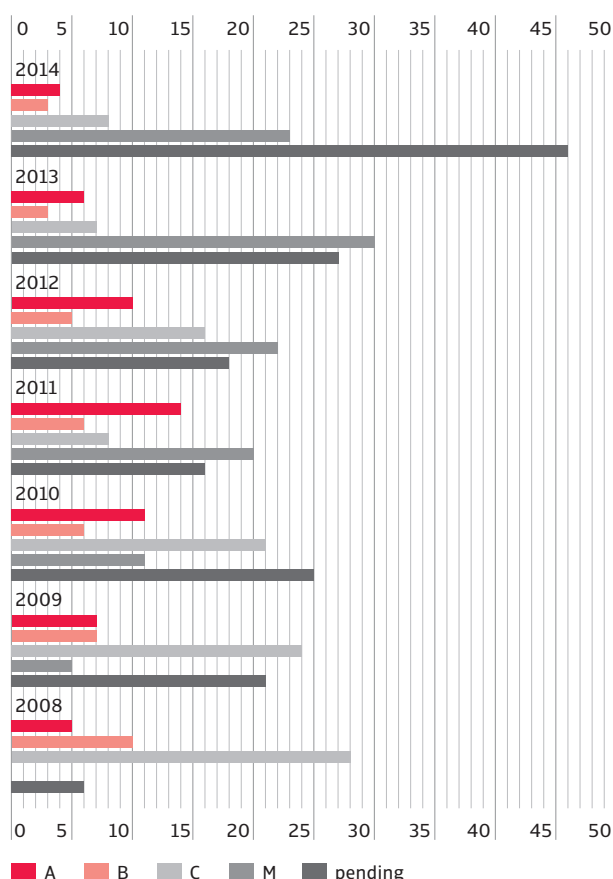
Figure 2: Applications screened in 2014, by category



Report on applications screened and reviewed in 2014

In 2014 we received 287 applications pertaining to 205 export transactions. The discrepancy in the number of applications versus the number of transactions is due to the fact that, for 82 transactions, both an exporter and a bank were involved and therefore both submitted an application for cover. We thus conducted 205 screenings in order to determine whether an environmental and social impact assessment was required. This number was approximately 15% higher than in 2013. In 2014, 38 projects were ultimately defined, classified and their environmental and social aspects reviewed. It must be noted that this small number gives a distorted view of the actual number of applications, as sometimes a single review can pertain to several applications. This is the case when various exporters submit applications for different

Figure 3: Number of applications reviewed and classification 2008-2014



2 The responsibility for this has meanwhile been transferred from the Ministry of Economic Affairs to the Ministry of Foreign Affairs

goods and services transactions for the same project or when several exporters compete for the same project and each one submits an application for export credit insurance for the project.

The piechart, (figure 3) displays the screening and classification distribution by category.

4 of the 38 applications were classified as category A projects (major potential adverse environmental and social impact), 3 as category B projects (substantial potential adverse environmental and social impact) and 8 as category C projects (little or no impact). In addition, marginal reviews, known as M reviews, which focus on the reputation of the buyer and the related project, were conducted on 23 applications.

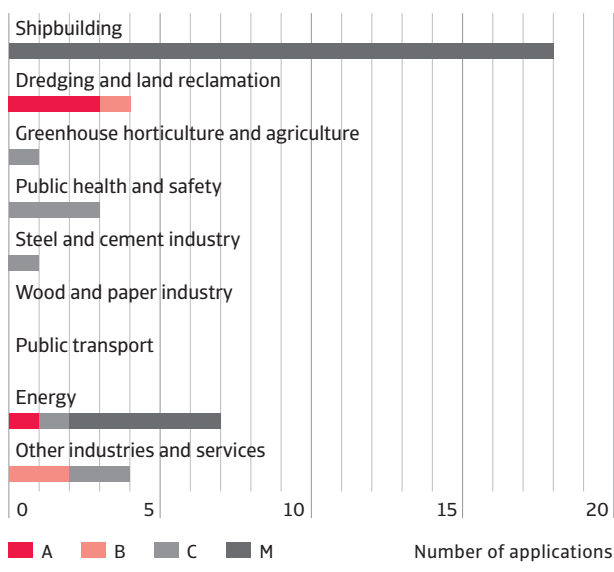
121 transactions were not reviewed. This was because screening showed that the nature, small size or sector of a transaction meant that a review was not required. A review may also have been unnecessary because an application was withdrawn during the review process or because it was rejected for other reasons.

Figure 3 clearly shows that the trend for the number of category A projects reviewed was reversed in 2012. After increasing steadily up to 2011, the number continued to decline in the years thereafter. The number of category B projects has also been declining but not as much and was the same in 2014 as in 2013. The number of category C projects has been uneven through the years. The number of category M projects, which had increased steadily since the introduction of this category in 2009, declined for the first time in 2014.

Just as in 2014, the shipbuilding sector, with 23 applications, was by far the largest sector requiring reviews. Far behind in numbers were the oil and gas, dredging and land reclamation, and public health and safety sectors. The number of reviews conducted for transactions in the “other products and services” category declined in 2014. It included various applications for projects which we hadn’t seen very often before such as the construction of bridges, a water purification plant and a spinning mill.

In 2014 one application was formally rejected on environmental or social impact grounds. Since the implementation of the Common Approaches in 2001, six applications have been rejected on these grounds. This figure gives a somewhat distorted view however, as applications which would have been rejected on either of these grounds were often withdrawn beforehand or rejected for other reasons such as financial shortcomings. In 2014 ten projects were either withdrawn during the environmental and social review process or rejected on other than environmental or social impact grounds.

Figure 4: Sector and classification of projects reviewed in 2014 as to their environmental and social impact



Environmental and social impact review processing times

We achieved our targets for the environmental and social review processing times in 2014. All of the reviews were completed within 30 processing days. This is a high score and is probably related to the lower number of category A and B projects reviewed during the year, which reflects a continuation of the downward trend of the past years.

The average environmental and social impact review processing time was 22 working days for category A projects, 9 working days for category B projects and 3 working days

for category C projects. Reviews for category M projects took an average of 4 working days. Processing times in 2014 were therefore on average longer than in 2013. The processing time required for Category B projects was the only one which declined, but as there were few Category B projects, this was not representative of the overall processing time. The overall processing times included the time it took to obtain all the information required for a review.

Figure 5 compares the average number of processing days required for each category from 2010 onwards.

Publication of environmental and social information for category A projects

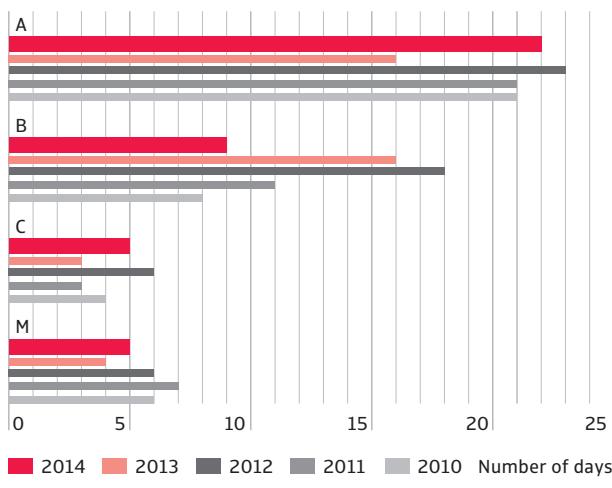
We published the category A projects we reviewed in 2014 on our website for 30 days before completing an environmental and social review, and therefore also before issuing an insurance policy or promise of cover. Third parties requested environmental and social impact information for all the projects. In one case we were able to make a summary available instead of the full environmental and social impact assessment. This is in line with the international standards for publication, which allows us to make a summary rather than the full assessment available

to the requesting party. In all other cases we were able to make the environmental and social impact assessment available to the requesting party or parties. On several occasions these third parties asked Atradius Dutch State Business questions about the available information or gave us additional project information.

External consultants

In 2014 we contracted an external consultant to assist us with an environmental and social review on one occasion. This was due to the language in which the project information was available, which is usually the reason why we contract an external consultant. We require project information to be available in Dutch or English in order to be able to conduct a review and in this case the information was not available in either language.

Figure 5: Average number of processing days by category for reviews conducted from 2010 - 2013



Appendix

Overview of environmental and social reviews conducted in 2014

Table 1: Category A projects reviewed in 2014

Description of transaction and project	Project sector	Country of buyer and delivery
Land reclamation for the construction of an artificial island	Dredging and land reclamation	Nigeria
Petrochemical plant	Petrochemical industry	Kazakhstan
Dredging for an entry channel for a transshipment port	Dredging and land reclamation	Kazakhstan
Sand replenishment for beaches	Dredging and land reclamation	Romania

Table 2: Category B projects reviewed in 2014

Description of transaction and project	Project sector	Country of buyer and delivery
Construction of a bridge	Infrastructure	Suriname
Depositing sand for the elevation of an existing artificial island	Dredging and land reclamation	United Arab Emirates
Expansion of a water purification plant	Other industries and services	Ghana

Table 3: Category C projects reviewed in 2014

Description of transaction and project	Project sector	Country (and recipient country, if different)
Expansion of an existing hospital	Public health and safety	Sri Lanka
Fitting out of a new hospital	Public health and safety	USA (Nigeria)
Cogeneration and pallet production line	Energy	Latvia
Bridges	Infrastructure	Sri Lanka
Green house complex	Greenhouse horticulture and agriculture	Azerbaijan
New hospital	Public health and safety	Ghana
Machine for producing autoclaved cellular concrete	Steel and cement industry	Saudi Arabia
Yarn spinning mill	Other industries and services	Ghana

Table 4 Category M projects reviewed in 2014

Description of transaction	Project sector	Country (and recipient country, if different)
Transport and installation of oil platforms	Oil and gas industry	Mexico
Tugboats	Shipbuilding	Trinidad & Tobago
Fast crew suppliers	Shipbuilding	Tanzania
Freighters	Shipbuilding	Ireland
Pipe laying systems and cranes	Shipbuilding	Norway
Dredger	Shipbuilding	South Africa
Supply vessel for oil platform	Shipbuilding	Nigeria
Pumps for refinery	Oil and gas industry	India
Supply vessel for oil platform	Shipbuilding	The Faroe Islands (Denmark)
Fast crew suppliers	Shipbuilding	Italy
Silos for a refinery	Oil and gas industry	India
Gas turbine compressors	Oil and gas industry	India
Dredger	Shipbuilding	Russia
Water pipes	Oil and gas industry	Libya
Dredger	Shipbuilding	India
Fire and blast resistant doors and panels	Oil and gas industry	India
Tugboats	Shipbuilding	Russia
Supply vessel for oil platform	Shipbuilding	Nigeria
Supply vessel for oil platform	Shipbuilding	Nigeria
Multicat	Shipbuilding	United Kingdom
Barges	Shipbuilding	Panama (Colombia)
Fast crew suppliers	Shipbuilding	Mexico
Fast crew suppliers	Shipbuilding	Nigeria

