

## **DECLARATION**

**by the German National Contact Point for the  
OECD Guidelines for Multinational Enterprises**

**regarding a complaint filed by**

- Transparency International – Deutschland e.V.

**against**

- 57 companies (Oil for Food Programme)

## **SUMMARY**

The complaint dated 5 June 2007 alleged a violation of Chapter VI (Combating Bribery) of the OECD Guidelines by 57 companies based in Germany which had supplied goods, chiefly of a medical and technical nature, to the Iraqi government within the framework of the UN Oil for Food programme. Following careful consideration of the case, including consultation with other federal ministries, the NCP rejected the complaint in a letter dated 31 August 2007. According to the procedural guidance of the OECD Guidelines and its explanatory comments, the initial assessment of a complaint must also address the question of whether an investigation of the problem in question serves the objectives of the Guidelines. All of the cases in this complaint involved only the supply of goods. No investment nexus or supply chain relationship was involved. The OECD Guidelines therefore did not apply. The NCP pointed out that the competent law enforcement authorities had examined the events, and it also referred to the Federal Government's efforts to raise companies' awareness of their obligations in combating bribery.

