May 11, 2015

Dear Mr. Daignault

Petrobras and a number of its associates are currently under investigation for corrupt practices in Brazil. Former executives at Petrobras and a number of construction and engineering firms have been criminally charged. Eight individuals were recently convicted of crimes. Criminal investigations are ongoing into more than fifty politicians and members of congress. Both the U.S. Department of Justice and the U.S. Securities and Exchange Commission have opened investigations. According to media reports, the massive kickback scheme spans approximately a decade. Federal prosecutors reportedly began their investigation into Petrobras in mid-2013.

In December 2013, EDC provided Petrobras with between $250 and $500 million in financing for the procurement of Canadian goods and services.

Canadian firm Brookfield Asset Management Inc.’s Brazilian subsidiary is currently under investigation for corrupt practices in Brazil. In or around 2012, the U.S. Securities and Exchange Commission began to investigate the subsidiary. In 2013, the U.S. Department of Justice followed suit. In 2012, the Brazilian public prosecutor initiated legal action against the company. According to company filings, the investigations and lawsuit are ongoing.

In July 2014, EDC provided Brookfield Asset Management Inc. with between $100 and $250 million in “liquidity support for working capital purposes for operating businesses around the world.”

Would you please provide the following information:
1. How did Petrobras use the financing provided by EDC? What goods and services were procured by Petrobras and from which companies? What did Petrobras pay for these goods and services?

2. Are any of the Petrobras transactions that were financed by EDC currently under investigation in Brazil in relation to allegations of corruption?

3. Has EDC provided Petrobras with other financing or insurance in the last ten years, in addition to the loan provided in December 2013? If so, what and when?

4. What methods did EDC employ to evaluate Petrobras’ anti-bribery procedures prior to the approval of financing?

5. What, if any, assurances were made by Petrobras that financing from EDC would not be used to support commercial transactions tainted by corruption?

6. Has EDC investigated whether Petrobras used its financing for a criminal purpose? Has EDC investigated whether Petrobras is in violation of its contractual obligations to the Crown corporation?

7. How did Brookfield use financing provided by EDC? On what and where was the financing spent?

8. What methods did EDC employ to evaluate Brookfield’s anti-bribery procedures prior to the approval of financing?

9. What, if any, assurances were provided by Brookfield that the financing from EDC would not be used to support commercial transactions tainted by corruption?

10. Has EDC investigated whether Brookfield used its financing for a criminal purpose? Has EDC investigated whether Brookfield is in violation of its contractual obligations to the Crown corporation?

I look forward to hearing from you.

Yours truly,

Karyn Keenan
Director