

<u>Lapse Plan Summary Overview Export-Import Bank (as of 31JAN26)</u>	
Estimated time (to nearest half day) required to complete shutdown activities:	0.5 days
Total number of agency employees expected to be on board before implementation of the plan:	324 FTEs
Total number of agency employees expected to be furloughed under the plan (unduplicated count):	214
<u>Total number of employees to be retained under the plan for each of the following categories:</u>	
Compensation is financed by a resource other than annual appropriations:	110 FTEs
Necessary to perform activities expressly authorized by law:	0 FTEs
Necessary to perform activities necessarily implied by law:	80 FTEs
Necessary to the discharge of the President's constitutional duties and powers:	80 FTEs
Necessary to protect life and property:	30 FTEs
<u>Brief summary of significant agency activities that will continue during a lapse:</u>	
<p>Excepted budget activities and reauthorization; payment of claims under guarantee and insurance programs; processing of payments received under loan programs; processing direct loan disbursements due where failure to disburse would jeopardize an approved credit; payments required by contract; protection of property or assets in the event of imminent or actual default or potential impairment, including asset monitoring and recovery; responding to requests from government authorities and media regarding services, programs and other functions of EXIM Bank to ensure accurate representation in federal coordination and external engagements, including matters directly arising from the White House; processing strategic transactions; implementation of ongoing IT upgrades to support Bank operations; Board meetings to consider and approve matters of national strategic importance including IT and other staff support; issuing Congressional Notices and Federal Register Notices as needed to process strategic transactions.</p>	
<u>Brief summary of significant agency activities that will cease during a lapse:</u>	
<p>All IT services and systems not related to the functions listed above; all administrative support activities unless related to ensuring orderly lapse of appropriations; all asset monitoring and recovery activities except those listed above; approval of new direct loans, guarantees, insurance and working capital loans except pursuant to applications, transactions and functions listed above; business development activities not related to the functions listed above.</p>	

[TEXT CONTINUED ON FOLLOWING PAGE]

Export-Import Bank of the United States

Plan for Orderly Termination of EXIM Bank Operations in the Event of Failure to Enact Regular Appropriations or a Continuing Resolution

As of January 31, 2026

Introduction – Use of Carryover Appropriations

EXIM has unobligated FY 2025 appropriations, which remain available for use in FY 2026. EXIM may use these unobligated amounts for critical operations by excepted staff.

Plan for Short-Term Interruption

EXIM Bank currently has 324 employees. Under this plan, in the event of a furlough, EXIM Bank expects to retain 115 employees, i.e., approximately 34% percent of EXIM Bank's workforce, and 65 contractors. This number excludes 80 employees and 35 contractors in an on-call status. It is expected that this plan can be implemented within one-half day.

1. OMB, OPM, GSA, and the Department of the Treasury will be notified that lapse of appropriations activities of EXIM Bank are being initiated.

2. All exporters and commercial banks will be notified that EXIM Bank is temporarily closed. All delegated authority to exporters and/or banks under insurance and guarantee programs (such as the Working Capital Delegated Authority Program) will be suspended during a lapse in appropriations.

3. The Bank will continue to process and deposit funds received in connection with its guarantee and insurance programs.

4. The Bank will pay claims under its guarantee and insurance programs, which carry the full faith and credit of the U.S.-Government. The Bank is committed to pay within a specified time and payment does not require passage of annual appropriation legislation. This requires claims analysis, a certifying officer, cash control and an approving official. No payments will be made under third-party contracts unless permitted by law or as excepted above.

5. No employee travel after the funding lapse will be authorized from carryover funds except as necessary to address EXIM Bank priorities, other than for the protection of U.S. Government property, and employees on extended TDY will be furloughed. Employees who are on travel prior to the funding lapse will cease all business activities and return home in a reasonable amount of time.

6. Furloughing of employees in all divisions of EXIM Bank will be initiated except for those detailed in this plan.

7. Four Office of Human Capital (OHC) employees will remain to process furloughs and to address human capital actions.

8. EXIM Bank will maintain and service IT network systems to support payment of guarantee and insurance claims and other payments as provided in this plan and to implement ongoing IT systems and upgrades projects to support Bank operations, with existing resources and the support of service contractors.

9. For excepted budgetary activities, two employees of the Office of the Chief Financial Officer (OCFO) will remain until all related financial activity is completed, and

depending on Treasury and OMB deadlines, one additional employee will remain to complete required financial reporting activities.

10. A limited number of individuals are being placed in an on-call status to process invoices and in the event of disbursements coming due where the disbursement can be made through ministerial actions and failure to disburse would jeopardize an already approved credit, is required to protect property or assets or is required by contract, or as excepted above.

11. A limited number of individuals will be excepted or excepted on-call in the event of an imminent or actual default or potential impairment, including asset monitoring and recovery, or restructuring that requires the protection of property or assets, or ongoing litigation or similar proceedings related to collections overseas, as well as to process payment or reimbursement for incidental or out of pocket costs of such activities, or as excepted above.

12. GSA/EXIM Bank have ongoing changes and renovations in the Lafayette Building, where EXIM Bank's headquarters are located. GSA/EXIM Bank will continue renovations to prevent Damages for Delay claims of contractors that are paid for with previously obligated funds and will continue in the event of a lapse of appropriations.

13. A limited number of employees shall perform such duties as are necessary or advisable to process nominations made by the President of the United States of individuals to serve on the Bank's Board of Directors. These duties shall include responding to requests from Congress and implementing the duties of the President of the United States under Article II, Section 2, of the United States Constitution.

14. A limited number of employees shall perform such duties as are necessary or advisable to respond to requests from government authorities and media regarding services, programs and other functions of EXIM Bank to ensure accurate representation in federal coordination and external engagements, or to process existing applications and transactions previously approved by the Board, or as excepted above.

15. A limited number of employees shall perform such duties to discharge the President's constitutional duties and powers, activities necessarily implied by law, and/or as are necessary or advisable to process strategic transactions, or as excepted above.

16. Employees are expected to check open source and internal EXIM sources for updates on the shutdown and to return to work on their next regularly scheduled workday following enactment of appropriations legislation. EXIM will prepare a notification and return to work guidance for all affected employees. The notification will include instructions on reporting to work.

17. This plan does not account for the activities of the Office of the Inspector General.

18. The Bank will pay claims under both its guarantee and insurance programs. Depending upon volume and ability to process the Bank's legal obligations, additional staff may be recalled to handle claims processing.

19. The Bank will disburse funds and process shipment documents relating to operative loan and guarantee transactions, or as excepted above. Payments will be made under third-party contracts to the extent permitted by law or as excepted above.

20. The status of Bank assets and obligations will be reviewed on a regular basis and any other adjustments in personnel status will be made as needed.

**EXPORT-IMPORT BANK OF THE UNITED STATES CONTINGENCY
PLAN FOLLOWING FULL EXPENDITURE OF AVAILABLE
APPROPRIATIONS - ONE PAGE SUMMARY**

I. Services and programs that will remain operational include:

NAME OF SERVICE/PROGRAM	REASON
Payment of claims under guarantee and insurance programs, and under contract.	Authorized under necessary implication doctrine to maintain the full faith and credit of the United States Government
Processing of payments received under loan programs	Authorized under necessary implication doctrine and for the protection of property
Responding to requests from government authorities and media regarding services, programs and other functions of EXIM Bank to ensure accurate representation in federal coordination and external engagements; processing strategic transactions; protection of property or assets in the event of imminent or actual default or potential impairment, including asset monitoring and recovery; Board meetings to consider matters of national strategic importance; issuing Congressional Notices and Federal Register Notices as needed to process strategic transactions.	Authorized under necessary implication doctrine, to discharge the President's constitutional duties and powers, to maintain the full faith and credit of the United States Government and/or for the protection of property
On-call status only: processing disbursements due where failure to disburse would jeopardize an approved credit.	Authorized under necessary implication doctrine and for the protection of property

II. Services and programs that will be closed:

- All IT services and systems other than as excepted
- All administrative support activities unless related to ensure orderly lapse of appropriations
- All business development activity other than as excepted

III. Key citizen services that will be impacted:

- U.S. exporters will be unable to obtain new EXIM Bank financing (except as set forth above), which may result in loss of export sales and reputational damage to the Bank
- Delayed closings and non-emergent loan disbursement (except as set forth above), which may negatively affect delivery of U.S. exports and reputational damage to the Bank
- Preliminary commitments will not be converted into final commitments (except as set forth above), which may result in the loss of export sales and reputational damage to the Bank
- Processing of amendment and waiver requests will not occur (except as set forth above), which may materially delay transaction performance or cause extra costs to be incurred; it may also result in the delay or loss of exports sales and reputational damage to the Bank.
- U.S. Exporter education — EXIM Bank will be unable to provide access to EXIM Online and other services.

IV. Employees.

- Total Agency Employees: 324
- Total Employees Furloughed in the Event of Lapse and Exhaustion of Carryover: 214