Welcome to Dorsey & Whitney’s monthly Anti-Corruption Digest. Anti-corruption enforcement crosses boundaries like no other, so keeping up to date is more important than ever. In this digest, we draw together news of enforcement activity throughout the world and aim to reduce your information overload. Our London, Minneapolis, New York and Washington DC offices edit the digest and select the most important material so that you can use this digest as a single source of information.

The USA

Bank of New York Mellon

The Bank of New York Mellon Corporation (“BONY”) has disclosed in its most recent SEC filing that on January 23, 2015, it received an additional subpoena from the SEC “expanding the scope of the SEC’s inquiry into the provision of internships and employment opportunities offered [by BONY] to officials and relatives of officials and government-related entities.” BONY noted that it “has fully cooperated with the SEC Staff’s investigation.”

This subpoena follows the SEC’s issuance in the fourth quarter of 2014 of a Wells notice to BONY, as reported in the February 2015 Digest. The SEC sends a Wells notice when it has determined that it may bring a civil action against a person or firm, and allows the firm to explain to the SEC why it should not bring an enforcement action. The Wells notice and this subpoena are part of an SEC investigation dating back to 2011, of several financial institutions including BONY related to potential FCPA violations arising from their business practices and relationships with sovereign wealth fund clients.

Indictment Against Foreign Nationals for Foreign Bribery Activity Dismissed

Judge Breyer of the Northern District of California has dismissed an indictment for honest services fraud and conspiracy brought against two foreign nationals, Yuri Sidorenko and Alexander Vassiliev, after concluding that the court did not have jurisdiction over the foreign bribery case. United States v. Sidorenko, 14-CR-341 (N.D. Cal.). Honest services fraud is described in the federal mail and wire fraud statute, and has been interpreted by the United States Supreme Court to criminalize fraudulent schemes designed to deprive another person of honest services through bribes supplied by a third party.

The United States Attorney’s Office for the Northern District of California indicted Mr. Sidorenko and Mr. Vassiliev based on allegations that they paid bribes to Mauricio Siciliano, a Venezuelan national and Canadian

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residents. Mr. Siciliano was an executive of a United Nations agency called the International Civil Aviation Organization (“ICAO”), which is headquartered in Montreal and standardizes machine-readable passports.

The alleged bribery activity took place outside the United States, between foreign nationals. The only United States touchpoint was that the United States provides a percentage of ICAO’s funding. Judge Breyer noted that the United States funds a large number of foreign agencies.

In dismissing the indictment, Judge Breyer agreed with the defendants that the honest services fraud statute does not apply extraterritorially, i.e., to activity occurring outside the United States. He noted, “They actually have law enforcement in Canada. If you’re so concerned about the way some Canadians are operating with a Canadian-based company in dealing with Ukrainians, you can always phone the Mounties.”

DOJ Advises Companies Against “Boiling the Ocean” In Investigations

Assistant Attorney General for the United States Leslie Caldwell advised in a speech that companies should avoid the unnecessary expansion of the scope of investigations. She was deflecting blame that frequently is placed at the doorstep of DOJ, for causing companies to incur massive expenses related to FCPA investigations: “All too often, criticism is leveled against the Justice Department for purportedly causing companies to spend years, and many millions of dollars, investigating potential violations.”

“Although [DOJ] expect[s] internal investigation to be thorough, we do not expect companies to aimlessly boil the ocean. Indeed, there have been some instances in which companies have, in our view, conducted overly broad and needlessly costly investigations, in some cases delaying our ability to resolve matters in a timely fashion.

For example, if a company discovers an FCPA violation in one country, and has no basis to suspect that violations are occurring elsewhere, we would not necessarily expect it to extend its investigation beyond the conduct in that country. On the other hand, if the same people involved in the violation also operated in other countries, we likely would expect the investigation to be broader.”

Ms. Caldwell went on to explain that the foundational principles of an investigation conducted by a company that seeks cooperation credit should be “to conduct appropriately tailored investigations designed to root out misconduct, identify wrongdoers and provide all available facts.”

SEC and DOJ Discuss Mistakes Companies Make When Cooperating

Tracy Davis, assistant regional director of SEC’s San Francisco office, and Assistant United States Attorney Adam Reeves spoke at a May securities conference in California, where they outlined some of the mistakes that companies make when they attempt to cooperate in a government investigation:

- Companies fail to secure electronic records, particularly text messages. Ms. Davis said one of the first questions the SEC asks of cooperating companies is, “Have you secured the places there might be evidence?” She acknowledged that collection of this data may be affected by in-country data privacy laws, but advised that a company should be able to substantiate this position in favor of non-collection.
Companies sometimes wait too long (4-6 months) to start turning over documents to the government, and fail to provide the government with necessary documents. Mr. Reeves suggested that companies should turn over all of the documents the government will need to assess the investigation prior to DOJ requesting the documents.

Companies frequently disclose only part of their findings. Mr. Reeves recommended either going “all in” on cooperation, or waiting for the government to act, rather than sharing partial information with the government.

The United Kingdom

Procurement Engineer Pleads Guilty to Conspiracy to Take Bribes

Following a joint investigation by the Serious Fraud Office (the “SFO”) and City of London Police, Graham Marchment reportedly pleaded guilty to conspiracy to take bribes in relation to contracts worth £40 million ($60 million). It is said that the contracts related to energy and infrastructure projects in Egypt, Russia, and Singapore.

According to the SFO, between 2004 and 2008 Mr. Marchment, who worked as a procurement engineer for Fluor, allegedly conspired with four co-defendants to leak confidential information to bidders in return for payments disguised as commissions. It is said that he refused to return to the UK from the Philippines for questioning by the SFO, and due to a lack of extradition treaty between the countries he could not be forced to return. It was only when his passport expired in December 2014 that Mr. Marchment was required to return to the UK, where he was arrested and charged.

Mr. Marchment pleaded guilty to three counts of conspiracy to corrupt, contrary to the Criminal Law Act 1977, and was sentenced to two and a half year's imprisonment on each count, to be served concurrently. When handing down Mr. Marchment’s prison sentence, HHJ Taylor said: “You with your experience knew that the information you were passing was confidential and would be useful to rival bidders… You were in a position of trust … [yet] were motivated by greed.”

City of London Police Detective Constable Martina McGrillen said that Mr. Marchment’s imprisonment “sends out a clear message that if you break UK laws you should expect to face the consequences in a British court”.

Alstom Official Charged

A former executive of Alstom International Limited, who reportedly held a senior position regarding “ethics and compliance” within the company, has been charged at Westminster Magistrates’ Court for allegedly bribing foreign officials. The charges against Jean-Daniel Lainé are said to relate to contracts to supply trains to the Budapest Metro from January 2006 to October 2007. Mr. Lainé is the sixth individual to be charged by the SFO in connection with the matter. According to the SFO, Mr. Lainé has been charged with two counts of corruption as well as two offences of conspiracy to corrupt.

As reported in the April edition of the Digest, Alstom Network UK Limited along with its business development director, Michael Anderson, have also been charged in relation to the matter. Both Mr. Lainé and Mr. Anderson are due to appear before Southwark Crown Court later this month.
Mayor of Tower Hamlets Guilty of Corruption

The Metropolitan Police is reportedly considering whether to launch a criminal inquiry into the former mayor of the East London borough of Tower Hamlets after he was found guilty of multiple corruption allegations following a 10-week hearing at the High Court. Lutfur Rahman was found to have used religious intimidation, vote-rigging and wrongly branding his Labour Party rival as a racist to gain power in the election in 2014.

Judge Richard Mawrey held that “bribery” had been “proved” following an examination of grants in the borough. He noted that the administration of grants had been “firmly in the personal hands of Mr Rahman” and his “cronies”. “In administering the grants policy, Mr Rahman acted in total disregard of the council's officers, its members and, almost certainly, the law,” Mawrey J. held. It was further reported that large amounts of money were given to organizations that were “totally ineligible” for such donations. The Judge also found that the vote was fixed following evidence from a handwriting expert that hundreds of ballot papers carried marks suggesting they could have been filled out by the same person.

Ken Livingstone, the former mayor of London, said he was “distinctly uncomfortable” with a court's ability to remove an elected mayor, stating that, “if there is any illegality, then surely that’s a matter for the police”. Mr. Livingstone stated that he was “uneasy” with an elected mayor being removed from power by a person “who is essentially a bureaucrat”, noting that “what I don’t understand is why he [Mawrey J.] found evidence of corruption that the police have so far failed to identify”.

In a statement Mr. Rahman said that he “strongly denies any wrongdoing”. The re-run poll is likely to be held in June.

Football: Match-Fixing

It has been reported that Delroy Facey, a former Premier League footballer, has been jailed for two and a half years having been convicted of conspiracy to bribe current professional football players.

Mr. Facey denied any wrongdoing, claiming that he believed the two corrupt businessmen were “clowns” whom he did not take seriously and decided to “humor”. However, during his trial the court heard that he acted as a middle man, influencing a footballer at a struggling non-league club to make some “easy money” by fixing the result of a match.

In a conversation via text-messages, Mr. Facey allegedly made contact with the Hyde FC player, Scott Spencer, shortly after discussing the Club’s poor run of form with a convicted match-fixer. Mr. Spencer, who the court heard was not involved in any form of match-fixing, was messaged by Mr. Facey, who told him:

“You lot [Hyde FC] get rinsed out, week in, week out. You lot should make some money out of this lad, easy money. Check this out. Four goals in a game – two in either half – and you guys can get 2k each, win lose or draw”.

Judge Mary Stacey said that Mr. Facey’s offences struck “at the very heart of football”, noting that he was “a role model” but had abused that position.
Amendments to Financial Crime Guide

The Financial Conduct Authority (the “FCA”) has published an amended Financial Crime Guide (the “Guide”), which gives guidance on financial crime systems and controls. The Guide is not binding on firms but “should be applied in a risk-based, proportionate way”. The revisions follow a thematic review in 2014 which consulted on managing the bribery and corruption risks in commercial insurance brokers.

The updated Guide notes that, “We [the FCA] found that most intermediaries [brokers] we saw were still not managing their bribery and corruption risk effectively.” As a result, the Guide addresses how commercial insurance intermediaries should manage, among other things, their governance, risk assessment, payment controls and training. The guidance includes the following:

- Appointing an anti-bribery and corruption officer with technical expertise and professional credibility.

- Identifying and assessing the bribery and corruption risk across all aspects of their business.

- Setting meaningful thresholds for gifts and hospitality that reflect business practice and help identify potentially corrupt actions.

- Appointing a compliance expert within each business area who provides anti-bribery and corruption advice to staff.

A copy of the updated Part 2 of the Guide can be found [here](#).

## THE REST OF THE WORLD

### Algeria

A court in Algeria has reportedly sentenced 14 people to prison and fined seven foreign companies in a corruption case labelled by local media as the “scandal of the century”. The ruling is said to have found the defendants guilty of corruption, misappropriation of public funds and money laundering in connection with the construction of a 1,200Km highway through the North of the country, linking neighboring Morocco and Tunisia.

Reports state that the project has overrun by nearly a decade and which has seen costs increase by a reported $7 billion (£4.5 billion). The presiding judge is reported to have found seven foreign firms guilty of the charges and ordered them to pay $56 million (£36 million) each. Despite the companies not being publicly identified, it is said that they are from China, Japan, Switzerland, Canada, Spain and Portugal. The 14 people imprisoned reportedly include a former high ranking official at the ministry of public works and a financial consultant. They have allegedly been ordered to pay a fine of $34 million (£22 million) each and received prison sentences of 10 years.

### Australia

The Chief Executive of the fleet management company, Orix, has reportedly been charged for allegedly paying bribes, in the form of commissions, to an employee of Coca-Cola Amatil. John Carter is said to have made corrupt payments of just over AUS$500,000 ($400,000/£250,000) to the fleet manager of Coca-Cola Amatil in exchange for vehicle leasing contracts. However, according to New South Wales Police, the matter could be far wider, possibly involving millions of dollars and years of corruption.
It is alleged by the Police that Mr. Carter was aware of four large deposits paid to the Coca-Cola Amatil fleet manager and allegedly advised his senior manager on how to make the payments. The alleged deposits were reportedly made between June 2014 and February 2015 into a secret bank account specifically set up for the matter. The Police are further alleging that the money was subsequently laundered by the Coca-Cola fleet manager. Fraud and Cybercrime Squad investigators are said to have seized hundreds of documents from the offices of Orix and Coca-Cola as well as the homes of the three individuals.

Coca-Cola allegedly tipped off the police last year having noticed suspicious activity relating to its vehicle fleet. A spokesman for the multinational company said that it was “providing its complete co-operation and support to the police”.

**Austria**

The Austrian courts have reportedly refused a request from the United States to extradite Dmytro Firtash, said to be a “pro-Russian Ukrainian oligarch”. A United States’ Grand Jury indictment alleged that Mr. Firtash, along with a member of India’s Parliament and four others, allegedly conspired to pay at least $18.5 million (£12 million) in bribes for mining licenses in the Indian coastal state of Andhra Pradesh. According to the United States’ Department of Justice (the “DOJ”), the mining project was expected to generate more than $500 million (£325 million) annually from the sale of titanium products, including sales to unnamed company headquartered in Chicago.

Mr. Firtash is said to have told the court that the accusations were “absolutely untrue”, arguing that he was the victim of a political smear campaign. Judge Christoph Bauer is said to have held that evidence relied on by the DOJ was not reliable as it included incomplete testimony from two anonymous witnesses, ruling that the request by the United States was “politically motivated and therefore extradition is inadmissible”. Following the decision of the court, Mr. Firtash said in a statement that, “I have already expressed many times my confidence in the Austrian justice system … today this confidence has proven to be justified”.

The DOJ is said to maintain that there was no political motivation behind their extradition request. A State Department official stated that, “This is a case brought by the [US] Justice Department as part of a foreign corruption investigation … we are disappointed with the court’s ruling and have filed an appeal”.

**Brazil**

Brazil’s state run oil company, Petrobras, is reported to have lost approximately $2.1 billion (£1.3 billion) in an ongoing corruption investigation. The losses, written down in the company’s audited financial results as “improperly capitalized additional spending”, are related to a matter federal prosecutors have called the biggest corruption case in Brazilian history.

Prosecutors leading the investigation, known as “Operation Carwash”, allege that employees at Petrobras worked with various engineering and construction firms to inflate the price of contracts and take the excess funds. The company has said that it will sue some of its former contractors for damages, helping to offset some of the potential losses it is facing from investor lawsuits in the United States, where it is listed. The first of these civil lawsuits have reportedly been filed against Engevix and Mendes Júnior. It is said that Petrobras is seeking an estimated amount of $150 million (£95 million) in fines, material
damages and “moral” damages from the two companies.

Taisa Maciel, the executive manager of the company’s legal department, is reported to have said that, “Petrobras is taking all necessary measures for the full repatriation of the losses suffered, including to its reputation”.

China

China has continued with its ongoing anti-corruption campaign.

In the energy sector, a senior executive at the state energy firm China Sinopec Group is reportedly under investigation for suspected “serious disciplinary violations”, a phrase which has become synonymous with allegations of corruption. China’s Central Commission for Discipline Inspection has reportedly confirmed the investigation but has not disclosed further details about the case. The Chairman of Sinopec, Fu Chengyu, said in an interview with Chinese media that the company supports “the government’s long-term anti-corruption effort, not just cracking down on illegal acts but disciplinary wrongdoings as well”.

In the healthcare sector, it has been reported that the head of Yunnan’s No. 1 People’s hospital is under investigation for allegedly receiving bribes of ¥35 million ($5.6 million/£3.6 million) in cash, 100 properties worth approximately $13 million (£8 million) and a number of car parking spaces. It is alleged that Dr. Wang Tianchao used his position to seek bribes related to medical device procurement and employment positions. Dr. Wang, who was reportedly in the running to become the head of the region’s food and drug regulator, has been removed from his post.

In the retail motor industry, a former top executive at Volkswagen’s joint venture with FAW Group Corporation has been sentenced to life in prison for allegedly accepting bribes. Shi Tao was reportedly convicted of taking ¥33 million ($5 million/£3.2 million) in bribes in exchange for giving business to advertisers and car dealers from FAW-Volkswagen. In a statement, Volkswagen said that it was aware of the case, noting that “globally, Volkswagen is strictly against any kind of illegal conduct, and attaches great importance that all applicable anti-corruption laws are adhered to”.

In its global efforts to trace alleged “economic fugitives”, the Chinese government has published a list of 100 individuals suspected of corruption. The “most wanted” list, which displays the individuals’ photographs, identification numbers and likely whereabouts, is said to be composed of former local government officials, police officers and accountants who are suspected of accepting bribes, misappropriating funds and money laundering.

Greece

Greek prosecutors have reportedly charged seven individuals with bribery and money-laundering offences for their alleged role in various deals for military vehicles, said to be worth more than €100 million ($110 million/£70 million). The contracts are reported to be between the Greek government and the German car manufacturer, Daimler AG.

It is alleged by prosecutors that senior executives at Daimler and the company’s representative in Greece, Emmanouil Lainopoulos, paid at least €2 million ($2.2 million/£1.4 million) in bribes to officials at the Greek Ministry of Defense from 2001 onward. The money is said to have been paid through third parties, offshore bank accounts out of “slush funds” kept by Daimler, and was part of a deal to help the company secure three
contracts with the Greek Army between 1997 and 2000.

A spokeswoman for the car manufacturer reportedly said that the company had not been formally notified of the charges, but that it would assist the Greek authorities in their investigation.

International

A two-year study into the defense industry has been published by Transparency International. The report measures the level of transparency and the quality of anti-corruption programs in 163 defense companies from 47 countries.

The head of defense at Transparency International, Mark Pyman, noted that: “Corruption in defense affects us all. It is not just about commissions on sales. Corruption can also directly threaten the lives of citizens and soldiers. If government contracts are contingent on companies having appropriate ethics and anti-corruption programs in place, it will create a step change in accountability.”

The report notes a growing concern regarding the lack of transparency in offsets, side deals demanded by governments as a condition for the award of a defense contract. These are said to often include local production requirements or investments in unrelated activities. The United States consulting firm, Avascent, is reported to have estimated that offset obligations could total $500 billion (£325 billion) by 2016. According to Transparency International, 50% of the companies reported on either confirmed or were found to enter into offset contracts.

Other key statistics from the companies analyzed in the report include the following:

- 76% do not provide evidence that they explicitly prohibit facilitation payments.
- 32% provide evidence of an explicit anti-corruption training module.

A copy of the report can be found here.

Israel

The Tel Aviv District Court has reportedly sentenced Rabbi Yoshiyahu Pinto to a year in prison for allegedly giving 400,000 shekels ($100,000/£60,000) in bribes to a senior police official who now heads the National Fraud Squad. The payments were allegedly made to gain information from Mr. Bracha about a criminal investigation into Hazon Yeshaya, a foundation headed by Rabbi Pinto. It is said that Mr. Bracha had reported the matter to his superiors in the police force.

Rabbi Pinto’s sentence has been reduced as part of a plea bargain, which is reported to also carry a one million shekel ($260,000/£165,000) fine. Described as “a rabbi to the rich and famous”, Rabbi Pinto reportedly told the court, “I apologize and accept the judgment of the state”.

A spokesperson for the State said that the prison sentence showed that “even powerful people with connections still get justice for their deeds”.

Malawi

It has been reported that police in Malawi have arrested the country’s former army chief following allegations that he and a former colleague were allegedly involved in a “multi-million dollar” corruption matter.
According to Malawi’s Anti-Corruption Bureau (the “ACB”), Commander General Henry Odillo and his former deputy, Lieutenant Colonel Clement Kafuwa, allegedly arranged a $4.4 million (£2.8 million) contract for the supply of military uniforms but the goods were never delivered.

Their arrest is the most recent development into the ACB’s ongoing investigation into corruption within the country. According to reports, operation “cashgate”, which began in 2013, has shown that “dozens” of civil servants had extracted around $60 million (£38 million) in government funds by conspiring with business leaders to make payments for goods and services that were never fulfilled.

Mexico

Mexico’s Congress has approved a new anti-corruption law which reportedly strengthens oversight of public officials while also designating a special prosecutor to address corruption. The legislation, which is said to include new rules requiring officials to declare potential conflicts of interest in their personal financial dealings, was allegedly fast-tracked by President Enrique Peña Nieto following reports that his wife had purchased a mansion from a contractor favored by the Government.

Opposition parties are said to have joined with the President’s party to approve the new law, however some anti-corruption organizations have expressed caution, suggesting that the project will just give a “face lift” to existing institutions and will not address the core problems, such as the low rate of prosecutions for corruption. Other commentators have questioned the need for the new system, asking “why change the laws when the real issue here is political will?”

The introduction of the new anti-corruption program comes at a time when the fairness of public spending will face a big test: The opening of the oil industry to foreign investment presents will see the tendering of extremely high value of contracts with international companies.

The Netherlands

The Dutch Ministry of Security and Justice is reportedly investigating an alleged corruption matter regarding two international telecom companies and the daughter of the president of Uzbekistan.

It is alleged that payments of 2.3 billion Swedish crowns ($358 million/£230 million) were made by the Swedish firm, TeliaSonera, to Ms. Karimova in return for mobile telephone frequencies along with licenses to enter Uzbekistan’s telecom market. The other telecom company named is VimpelCom, a Russian group.

Dutch prosecutors reportedly initiated their investigation last year having been asked for assistance by the Swedish government. The request is said to be on the grounds that one of the alleged bribe payments, reportedly in the region of $220 million (£140 million), was reportedly made through a trust account operated by the Dutch law firm, Houthoff Buruma.

Dutch prosecutors have also reportedly been tasked with calculating the profits generated by the defendant companies in their territory.

Russia: Corruption in the Sakhalin Region

It has been reported that police in the Sakhalin region, the Russian island lying to the North of Japan, have opened two criminal cases against Alexei Leskin, the Deputy Mayor of Yuzhno-Sakhalinsk. A spokesman for Russia’s Investigative Committee, Vladimir Markin, said that Mr. Leskin is suspected of allegedly
accepting two bribes totaling 15 million rubles ($300,000/£195,000). According to further reports, Mr. Leskin’s office has been searched and documents have taken to be used as evidence against him.

Mr. Markin is said to have further reported that the former Mayor of the city, Andrei Lobkin, is also wanted in connection with the matter. It is said that he is suspected of acting as a mediator for the alleged bribes in return for receiving favorable outcomes in local elections.

The investigations against Mr. Leskin and Mr. Lobkin follow a series of anti-corruption investigations on the Sakhalin Island, which is said to be “resource rich”. As reported in the March edition of the Digest, the former Governor of the Sakhalin region, Alexander Khoroshavin, was arrested having been accused of receiving more than $5.6 million (£3.8 million) in bribes to allegedly facilitate various business deals while in office. It has since been reported that two former ministers who served in Mr. Khoroshavin’s regional government have also been detained following accusations that they received bribes.

The investigations are ongoing.

**Russia: New Index to Measure Corruption**

The Russian governmental Institute of Law and Comparative Jurisprudence is reportedly preparing to publish a new tool to evaluate levels of corruption in a territory. Its authors are reported to have claimed that their model is superior to Transparency International’s Corruption Perceptions Index, which ranked Russia 136th of 175 countries. Russian officials are said to have repeatedly criticized the approach taken by Transparency International as “biased and politicized”.

The Institute’s new system, labelled the International Program for Monitoring Corruption (“MONKOR”), is reportedly based on criminal statistics, economic data, opinion polls and analysis of national legislation. The authors claim that this makes it superior to Transparency International’s index, which “only evaluates [the] psychological attitude of responders in polls”, noting the importance of “mov[ing] away from a subjective approach and towards objective research”.

A trial of the new index is reportedly being held in Russia and Kyrgyzstan, while talks are also taking place with other countries in the Eurasian region.

**Tajikistan**

A Tajik high-school student, Khushdi Qurbonov, who is said to have a “passing resemblance” to the President’s 16 year-old son, Somon Emomali, allegedly posed as him and reportedly collected over $50,000 (£32,000) in bribes in return for political favors. It is said that his victims included government officials.

One of Mr. Qurbonov’s targets was allegedly seeking a plot of land and Mr. Qurbonov convinced him that he would use his influence as a member of the ruling family to secure him a lucrative area in the Rudaki district. After receiving the bribe payment, the teenager, posing as Somon Emomali, is said to have contacted the government official in charge of land distribution, requesting that the land be granted to his victim.

The official reportedly did not deliver the land, but Mr. Qurbonov is alleged to have continued with his deception. Authorities are said to believe that the teenager was not acting alone.

**Ukraine**

A new law has been enacted requiring companies to have compliance programs in place. The law applies to most companies
participating in public tenders and state-owned enterprises over a certain size and in essence requires companies to appoint a compliance officer with responsibility for implementing the compliance program and reporting to shareholders. The law does not include penalties for failing to implement a compliance program; however companies are encouraged to:

- Conduct regular risk assessments.
- Develop programs to raise employee awareness of anti-corruption.
- Include compliance provisions in contracts with third parties.

Despite the apparent lack of enforcement in place, it is said that officials may consider the establishment of a compliance program when deciding whether to pursue an action against a company.

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Corruption issues are also addressed in the Anti-Fraud Network’s newsletters: see www.antifraudnetwork.com for current and archived material; see also the Computer Fraud website at http://computerfraud.us and www.secactions.com.

This update is provided for general informational purposes and is not intended to constitute advice. If you require advice on any of the matters raised in this update, please let us know and we will be delighted to assist.