Global Compact Network Canada

EASTERN EUROPE

Chapter Twelve of Designing an Anti-Corruption Compliance Program:
A Guide for Canadian Businesses

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Eastern Europe

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Eastern Europe presents both a great opportunity for businesses and a great challenge. The region has tremendous market potential and many areas in the region have a well-educated workforcel. Expansion of foreign investment is an inevitability. In this chapter, we address the current state of the anti-corruption landscape in the region and consider an approach to anti-corruption for businesses trading with, or considering an expansion into, Eastern Europe.

Eastern Europe has 15 countries, but our primary focus is on the critical economy of Russia. The Ukraine and other neighbouring countries are considered both in their national contexts and in respect of the Transparency International corruption rankings. We also discuss the Anti-Corruption Network for Eastern Europe and Central Asia.

Transparency International Rankings for Eastern Europe

The following table includes information excerpted from the 2015 Corruption Perceptions Index prepared by Transparency International ("TI") for the available countries commonly considered to make up Eastern Europe.

Country/Territory	2015 Corruption Perceptions Index Score[2]	Rank[3]
Estonia	70	23
Poland	62	30
Lithuania	61	32
Slovenia	60	35
Czech Republic	56	37
Latvia	55	40
Croatia	51	50
Hungary	51	50
Slovakia	51	50
Romania	46	58
Montenegro	44	61
The FYR of Macedonia	42	66
Bulgaria	41	69
Serbia	40	71
Bosnia and Herzegovina	38	76
Albania	36	88
Kosovo	33	103
Moldova	33	103
Belarus	32	107
Russia	29	119
Ukraine	27	130

Source: Transparency International: www.transparency.org/cpi2015.

[1] Thanks to Sydney Hodge, student-at-law, for her invaluable assistance with the preparation of this chapter.

[2] A country's or territory's score indicates the perceived level of public sector corruption on a scale of 0 (highly corrupt) to 100 (very clean).

[3] A country's or territory's rank indicates its position relative to the other countries or territories in the index. The 2015 index includes 168 countries and territories.

I. THE RUSSIAN FEDERATION

1. Introduction

By introducing a national anti-corruption approach, the government of the Russian Federation has taken a step in the right direction in the fight against corruption. For the legislation to achieve its intended effect, however, enforcement needs to be streamlined and both the business and political landscapes need to adapt. Russia's economic growth prospects and its further integration into the global economy may depend on achieving the ultimate goal of reducing corruption substantially from current perceived levels.

2. Perception

In July 2008, the Foreign Investment Advisory Council of Russia ("FIAC") released a report on foreign direct investment, which came to the conclusion that the two major problems for foreign businesses in Russia are corruption and administrative barriers. With regard to administrative barriers, businesses are affected by continuous inspection and supervision by state and municipal officials, the requirement for regulatory approvals and licences for new business ventures, as well as scrutiny due to state and regional officials' hidden business interests. For a long time, the Russian authorities were sluggish about removing these hurdles. Increased anti-corruption activity in many EU states, however, notably some of Russia's key trading partners, seems to have given the fight against corruption new political impetus in recent years. That is reflected in an upward move on Transparency International's annual Corruption Perceptions Index ("CPI"), as Russia has gradually improved from 147th out of 168 countries in 2008, to 119th out of 168 in 2015.

3. New Anti-Corruption Legislation

Following his election in 2008, President Dmitry Medvedev adopted a "National Plan for Counteracting Corruption", which provided the basis for a review of anti-corruption legislation in the Russian Federation. Following the review, the government implemented Federal Law No. 273-FZ, "On Preventing Corruption" (the "Anti-Corruption Law"). In its early form, the law provided a new definition of corruption, but no specific criminal sanction for committing an act of corruption. In addition, it imposed an obligation on public servants to declare their income and avoid conflicts of interest. It was, however, widely criticized for depending on the enactment of further legislation.

The law was amended in 2013, introducing requirements that companies implement anti-corruption measures. These include, but are not limited to:

i. appointing a specific department or an official to be responsible for preventing corruption and related offences;

ii. co-operating with enforcement authorities;

iii. developing and implementing standards and procedures for ethical business practices;

iv. establishing an ethical code of conduct for personnel;

v. preventing and resolving conflicts of interest; and

vi. preventing the filing of false or off-the-record reports and the use of forged documents.

In an attempt to ensure a greater level of compliance with the Anti-Corruption Law, the Ministry of Labour also issued a guidance document to assist businesses in developing effective compliance programs.

The other source of anti-corruption legislation is the Russian Criminal Code. The Criminal Code does not explicitly identify corruption as an offence in itself, but prohibits the payment of bribes to, and the abuse of power by, public officials and individuals holding managerial positions in the private sector. For Russian citizens, these provisions have extra-territorial effect, not only applying when the act of corruption takes place on Russian soil, but also covering such acts outside of Russia. For citizens of other countries, the law applies only to acts of corruption committed within Russia, unless the act is directed against the

interests of the Russian Federation or a Russian citizen. It should be noted that despite the fact the legislative framework has been put in place, there have so far been no publicly reported cases of extra-territorial prosecutions. While there have been more domestic prosecutions for corruption-related offences, only around 8% of such cases result in a prison sentence (as explained below), and fines levied are not effectively enforced.

In addition to domestic laws, Russia has also ratified the UN *Convention against Corruption* and the Council of Europe *Criminal Law Convention on Corruption*, as well as the Organisation for Economic Co-operation and Development ("OECD") *Convention on Combatting Bribery of Foreign Public Officials in International Business Transactions*.

4. General Problem with State-Owned Enterprises

Despite increasing levels of privatization, state-owned enterprises ("SOEs") are still a very common and important feature of the Russian business landscape. Businesses are classed as SOEs when the state has significant control, through full, majority or significant minority ownership, or in cases where there is direct and indirect ownership by any level of government amounting to at least 10%. The 2013 amendment to the Anti-Corruption Law, which required public officials to declare their incomes, was also intended to apply to senior managers of SOEs. The intention was to allow consumers to compare the quality of the service they receive from SOEs to the wages the managers receive for providing this service. According to the UN *Convention against Corruption*, officials or deputies who cannot explain the origin of their property or income should be brought to justice with such property being confiscated. Although many senior managers published their incomes, in the vast majority of cases, the government failed to act on the information, thereby arguably undermining the effectiveness of both their own legislation and international law.

More interesting, however, are the cases in which managers of major SOEs failed to comply with their obligations. Big names such as Rosneft, Russian Railways and Gazprom ignored the requirement completely. The companies proffered a wide variety of arguments as to why they should be excused from the legislative requirements. Some complained of an invasion of privacy; others cited their lawyers' assessment of the legislation, or argued that they regularly sent their data to the government and the Federal Tax Service, thereby automatically accounting to the state. One even went as far as to claim that income disclosure amounted to the sharing of trade secrets, a rather outlandish argument when one considers that two of the three SOEs mentioned above are natural monopolies.

Company reports for 2014 show that all three SOEs have had significant losses in recent years. Industry analysts have indicated that these companies may be reporting a loss, but that accounting dexterity in relation to currency risks creates a smokescreen that companies such as these can easily hide behind. Western sanctions, low oil prices and a stagnating economy have done nothing to increase these companies' economic fortunes. These SOEs also seem to enjoy a certain amount of protection from the authorities, however, due to the fact that they act as important political tools. In fact, several top managers of major SOEs brought and won a claim against the Russian government in 2015, so that they no longer have to publish declarations of their income and property.

5. Political Causes

There are various political causes that hinder the fight against corruption in Russia. The lack of an independent mass media allows corrupt officials to hide in the shadows. Even when exposed in the media, the officials can often maintain anonymity – in relation to the population at large – because their actions are not widely reported. As the top managers of Rosneft, Russian Railways and Gazprom demonstrated, even when their actions are reported, officials at a certain level can blatantly disregard legislation and still come out on top.

The media in Russia have for many years been financed through public funds. The majority of large Russian media outlets are owned either by the government directly or financial groups close to the authorities. The effect of this has been that editors focus on "non-critical" coverage that will not attract negative attention from the government. Exposing the corruption of public officials is unlikely to fall into this category.

In 2012 and 2013, there were numerous high-profile corruption cases involving senior officials, including former agriculture minister Yelena Skrynnik, which received intensive coverage in the Russian media. It has been suggested that many of these high-profile cases were politically motivated and that the media were therefore allowed to report on them in great detail. Some commentators have argued that independent media in Russia, capable of presenting corruption-related topics to their readers without interference from the authorities, are in danger of extinction.

The judiciary has also suffered from a lack of independence, which has arguably allowed corruption to develop more broadly throughout Russia. The judicial system is dependent on the government and subject to influence by its senior officials. There have been allegations that many court decisions are dictated by the executive branch of the Russian government. Officials convicted of accepting bribes often receive mild sentences. Data published by the European Parliamentary Research Services show that the Russian Supreme Court convicted 6,014 individuals of corruption-related offences in 2013. The vast majority of those convicted received fines or conditional sentences. Only 506 individuals were handed prison sentences, which ranged from less than one year up to 10 years.

The effectiveness of the judicial system is further hampered by the fact that enforcement actions are rarely brought – even for large fines – and confiscation of assets is rare. In contrast, prominent opposition figures and critics of the government, such as high-profile lawyer Alexei Navalny or the band Pussy Riot, often receive severe sentences, including compulsory labour and long periods of house arrest. The European Parliament has expressed concern and recommended that the Council of Europe urge the Russian authorities to put an end to widespread corruption and reform the judiciary so that it would be in line with international standards.

A further factor that has inhibited efforts to combat corruption is the continued suppression of opposition parties in the Russian Federation. Officials are often appointed based on political considerations, rather than merit. The lack of political diversity has allowed many corrupt officials to build up a strong network of allies, which they can use as a shield when questioned. The absence of a functioning opposition has also facilitated corruption as voters have little choice and therefore do not have the option to hold the government to account when corruption is exposed.

6. *Foreign Corrupt Practices Act* and *Bribery Act* Enforcement

As set out on the U.S. Department of Justice website, "[t]he *Foreign Corrupt Practices Act* of 1977, as amended, 15 U.S.C. §§ 78dd-1, et seq. ('FCPA'), was enacted for the purpose of making it unlawful for certain classes of persons and entities to make payments to foreign government officials to assist in obtaining or retaining business."

In recent years, several U.S.-based companies have paid significant FCPA-related penalties in relation to their operations in Russia, most notably ZAO Hewlett-Packard A.O. ("HP Russia"). HP Russia paid a fine of $58.8 million following prosecution under the FCPA in 2014 after admitting it bribed Russian government officials to win a $45 million technology contract with the Office of the Prosecutor General of the Russian Federation. HP Russia confessed to creating a $5.8 million slush fund and using it to bribe Russian officials. The slush fund was created by the sale of products by HP Russia at a low price to secret channel partners – these products were subsequently bought back at a steep mark-up. HP Russia then sold the same products to the Russian customer – the Office of the Prosecutor

General of the Russian Federation – at the increased price. The inflated payments to the channel partners were laundered through a cascading series of shell companies registered in the United States, the United Kingdom, the British Virgin Islands and Belize. Slush fund payments from the shell companies to the Russian officials were made through offshore bank accounts in Switzerland, Lithuania, Latvia and Austria. Some of the money was spent on travel, cars, jewellery, clothing, expensive watches, swimming pool technology, furniture, household appliances and other luxury goods. HP Russia kept two sets of books: secret spreadsheets detailed the categories of recipients of the corrupt payments, while sanitized versions hid the bribes. HP Russia concealed the phoney channel partner sales from internal and external auditors and HP management outside Russia.

Other U.S. companies that have paid disgorgement and criminal penalties are a California-based life-science company, Bio-Rad, and an Ohio-based maker of automated teller machines, Diebold. Bio-Rad paid $55 million in 2014 to settle U.S. Department of Justice and Securities and Exchange Commission allegations that its subsidiaries made improper payments to foreign officials in several countries, including Russia. Diebold paid $48 million in 2014 to settle allegations that it covered up bribes to bank officials in several countries, including Russia. Diebold used cash, gifts, and travel and entertainment worth about $3 million to win and keep contracts for the sale of its ATM machines. It tried to hide the bribes by using third parties to deliver the payments and gifts, and calling the free travel given to bank employees "training".

In addition, there have been two recent notable imprisonments of individuals for bribe taking in relation to Russian companies and operations. In 2015, U.S. courts sentenced a U.S.-resident and former director of a Russian nuclear energy firm, Tenex, to 48 months in U.S. federal prison and ordered him to forfeit $2.1 million for taking $2 million in bribes to award uranium transportation contracts to an American company. Tenex, based in Moscow, is a subsidiary of Russia's State Atomic Energy Corporation, which acts as the sole supplier and exporter of Russian uranium to nuclear power companies worldwide. Notably, the individual was convicted of money laundering, which is not an FCPA offence, as the FCPA targets those who bribe foreign officials, but not the foreign officials who take the bribes.

Finally, there are currently several U.S.-listed issuers who have disclosed ongoing FCPA investigations into their Russian operations, including entities in the extractive and technology industries.

Enforcement through Other Foreign Legislation

There have been fewer reported prosecutions involving Russia under the UK *Bribery Act* (a number of suggestions have been made as to the reasons for this, but the discussion is beyond the scope of this chapter). The legislation in the U.K. applies only to matters that have taken place from July 1, 2011, and onwards, and major corruption offences take time to investigate. One recent relevant prosecution relating to Russia involved a British man who was sentenced in 2015 to 30 months in prison in the U.K. after he pleaded guilty to conspiracy to take bribes in connection with purchasing decisions for energy and infrastructure projects in several countries, including Russia. The man worked as a procurement engineer and leaked confidential information to bidders in exchange for payments disguised as commissions.

It should be noted that the appetite of the Serious Fraud Office ("SFO"), the executive prosecuting body in the U.K. that investigates serious and complex corruption matters, to bring charges is strong. The current head of the SFO, David Green, has indicated his support for the extension of the remit of the *Bribery Act* to apply not only to the prevention of bribes, but also to the wider prevention of "fraud" by corporate entities. He has been described as "not the warm and friendly chap you'd go and have coffee with. He is an out-and-out prosecutor who will want to see results." We are expecting to see further corruption prosecutions in the U.K. emerging in the coming years. Given the connections between the

U.K. and Russia, with many Russian companies and high-net-worth individuals owning property, doing business in the U.K., or utilizing its legal system for dispute resolution, it may well be that prosecutions with a Russian connection will be forthcoming.

Anti-Corruption Network for Eastern Europe and Central Asia

There are some interesting and hopeful initiatives that, if successful in propelling various Eastern European nations toward a more rigorous anti-bribery, anti-corruption landscape, may help force Russia to enter the same domain.

The Anti-Corruption Network for Eastern Europe and Central Asia ("ACN"), for example, was established in 1998 as a regional anti-corruption program under the OECD Working Group on Bribery. The ACN is a regional forum for the promotion of anti-corruption reforms, the exchange of information, the elaboration of best practices and the coordination of donor efforts. Its main objective is to support its member countries in their efforts to prevent and fight corruption.

One of the ACN's primary initiatives is the Istanbul Anti-Corruption Action Plan, which was launched in 2003 as a subregional peer-review program to support anti-corruption reform in Armenia, Azerbaijan, Georgia, the Kyrgyz Republic, Kazakhstan, Mongolia, Tajikistan, Ukraine and Uzbekistan through country reviews and ongoing monitoring of the implementation by participating countries of the recommendations made in the review processes.

The ACN published multi-country review reports on two key topics in 2015: the liability of legal persons (i.e., both natural persons and corporate bodies that have legal personality) for corruption and the enforcement of the foreign bribery offence. With respect to the former, the report outlines three basic models of corporate liability: (i) an identification model, where corporate liability is triggered either by the actions of senior management or by senior management's failure to supervise its employees; (ii) a vicarious liability model, where corporate liability is triggered by an offence of any employee acting within the scope of his or her employment with an intent to benefit the corporation; and (iii) an organizational model, where corporate liability is established through differences in an organization's corporate culture. All three models are represented in the legal systems of ACN countries, but the vast majority of countries use some version of the identification model. A review of the corporate liability regimes in practice indicates that while a majority of ACN countries have at least some experience with the sentencing of corporations generally (i.e., dealing with the concept of holding a corporate body to account), this is not the case with respect to corruption offences. Relatively few corporations have faced corruption offences, particularly in comparison to the robust prosecution of individuals for bribery and corruption across the region.

With respect to the enforcement of the foreign bribery offence, the ACN report indicates that while most ACN countries have a foreign bribery offence, efforts aimed at educating the public and private sector about corruption risks tend to be focused on corruption generally and domestic corruption in particular. In fact, many ACN countries have specialized units that investigate and/or prosecute corruption offences, including foreign bribery, but in most cases, the focus of awareness-raising and anti-corruption efforts is on domestic corruption rather than the foreign bribery offence. Although most ACN countries have institutions to investigate cases of suspected foreign bribery, only one (Bulgaria) has issued sanctions in a foreign bribery case, and only one other (Romania) has brought a foreign bribery case to trial.

Ukraine

The International Monetary Fund ("IMF") recently threatened to stall its $40 billion Ukraine bailout program if the country fails to take immediate action to tackle corruption. While Ukraine has stepped up its anti-corruption efforts in the last two years, Christine Lagarde, managing director of the IMF, warns that "Ukraine risks a return to the pattern of failed economic policies that has plagued its recent history." In fact, Ukraine's economic minister,

Aivaras Abromavičius, resigned in February 2016 after accusing Ihor Kononenko, senior aide to Ukrainian President Petro Poroshenko, of blocking anti-corruption reforms. Abromavičius is the second economic minister to resign from the current government for similar reasons. Pavlo Klimkin, the Ukrainian foreign minister, voiced concern over the recent IMF bailout delays, since the IMF program is critical in preventing a larger collapse of the steadily declining Ukrainian economy. He reassured the IMF that Ukraine has begun implementing a comprehensive anti-corruption system, but it needs time to develop.

Recent Ukrainian anti-corruption efforts include joining forces with the OECD in November 2014 to launch a country-specific anti-corruption project. An "Action Plan", designed to strengthen these efforts, was signed by President Poroshenko in April 2015 – it will result in a series of policy reviews and capacity-building activities aimed at establishing a sustainable and effective reform process. As part of a package of comprehensive legal reforms passed in October 2014, Ukraine criminalized all corruption offences, including the crime of illicit enrichment, and also established the National Anti-Corruption Bureau and the Specialized Anti-Corruption Prosecutor's Office. It is too early to determine the success of these initiatives, but the OECD third-round monitoring report ("OECD Report")[4] identified Ukraine's main challenge: effective implementation. Investigations into high-level corruption in recent years have yet to produce any convictions or tangible results.

In the meantime, several cases of Ukrainian corruption have appeared in the media. Olena Lukash, the former Ukrainian justice minister, was arrested on corruption charges in November 2015 for misappropriating approximately $2.5 million of state funds, committing forgery and perpetrating abuse of office. The arrest order was issued on November 6, 2015, one day after she was detained for questioning in connection with the deadly Maidan shootings, where more than 100 people were killed in Kyiv's central Independence Square by sniper attack in February 2014. Lukash served as justice minister from 2013 until February 27, 2014, around the time former Ukrainian president Viktor Yanukovych was forced out of power. The United States pledged to participate in reviewing the "treasure trove" of documents found after the removal of Yanukovych's government in order to prosecute corrupt officials.

In May 2015, Austrian authorities refused a United States extradition order of an important figure during Yanukovych's tenure, pro-Russia Ukrainian energy magnate, Dmytro Firtash. The extradition was in relation to FCPA-related charges that stem from a 2014 federal indictment where Firtash allegedly led a conspiracy to bribe Indian officials in exchange for titanium mining rights. The indictment seeks a forfeiture of Firtash's interest in nearly 150 companies and 41 bank accounts worldwide. Austrian Judge Christoph Bauer found the extradition request to be "politically motivated" and, therefore, inadmissible.

Aside from individual examples of corruption, the OECD Report also discusses corruption that is present in areas of industry. Ukrainian Hryvnia ("UAH") 5 billion worth of corruption payments is made annually for various inspections in the grain trade, and up to UAH 20 billion is spent annually on corrupt "tariffs" in the construction sector. These practices are alleged to be continuing under the current government.

Doing Business in Eastern Europe

For many, doing business involves a series of risk calculations. Individuals and entities must balance risk and reward. To begin with, anyone considering establishing a business or expanding one into Eastern Europe must factor in corruption as part of the overall risk matrix. Then a strategy should be implemented to establish how to address the corruption risk head on. The goal must be for zero tolerance of corruption.

[4] Monitoring reports are peer reviews undertaken as part of signatory countries' obligations pursuant to the OECD *Convention on Combatting Corruption in International Business Transactions*.

Plan Ahead

All good businesses start with effective planning. Developing a business free of corruption is no different. One cannot expect to jump into a business in Eastern Europe and somehow hope to avoid exposure to corruption issues. A detailed plan must be established from the very outset to develop and grow the business in a manner that does not allow for a culture of corruption to flourish.

For example, a plan to develop a business will inevitably require licensing, zoning, regulatory approval or some other form of governmental approval to even get off the ground. Without sufficient due diligence and planning plus a committed approach of zero tolerance of corruption, such rudimentary and fundamental tasks could set the business on a path toward inevitable corruption problems.

Third-Party Relationships

Perhaps the most significant decision any business will make when working in an environment with substantial corruption risks is which third parties will be chosen to assist you. This is the most important area to get right, as local expertise is often essential to doing business in a jurisdiction, but it also comes with the most potential risk. Whether you are choosing consultants, sales agents, in-country agents, freight forwarders, accountants or legal professionals, companies must choose very carefully. Partner only with individuals or entities that are equally committed to doing business without bribery or corruption. Team up only with those who have a proven reputation of achieving success and a clean track record. Begin your search with thorough due diligence that is sensitive to local and cultural nuances. Consider the resources of various NGOs, such as Transparency International, and consider discussing critical parties with local embassy staff. There are many resources that can be utilized in the search for reputable third parties. Many law and accounting firms offer services to assist in your due-diligence searches.

In addition, because of the significance of third-party relationships and the potential risk exposure that comes with them, conducting enhanced due diligence should be considered. For example, engaging investigators to conduct a detailed review of your potential partners or counterparties can give you a more detailed insight into the nature of the persons and entities you are dealing with. The additional upfront costs of this are more than offset by the risk of substantial cost and reputational exposure that can arise from being partnered with the wrong people.

Controlled Growth

While an explosion of growth and great riches may be a dream scenario for many businesses, it should not be the goal when expanding or growing a business in any area where corruption presents a real risk to the region. Unchecked growth will inevitably result in significantly enhanced risks of corrupt acts being committed by someone within the organization.

As mentioned above, detailed and careful planning will go a long way to ensuring that corruption will not be an accepted part of the business model. The same applies with careful and controlled growth. If a business creates an unrealistic and unnecessary expectation of expansion, then the need to get others to co-operate, including government officials, creates a significant pressure that increases the risk of cutting corners or adopting unlawful practices – and this is the perfect environment for corruption.

Culture

All good businesses will focus on creating a culture that breeds success. Anti-bribery/Anti-corruption ("ABAC") measures must also be a part of the culture. All good ABAC programs must insist on ABAC being part of the culture of the business from top to bottom. It must not simply be the job of one person or even one department, but rather it must be everyone's job to implement and be fully committed to an ABAC culture. In addition, steps must be taken to ensure that an ABAC culture is instilled in third parties engaged as part of any business venture. They may not have the same approach as your own business model, and raising the perception that corruption will not be tolerated in their organizations and dealings with you is critical.

Training

ABAC training for everyone in the organization should begin right away – this cannot be emphasized enough. The higher the risk of corruption, the more important the training. The training must be detailed, and must consider the nature of the business and the nuances of the risks faced by the business in the geographic region in which it is working.

ABAC Policies

While some may believe that *when in Rome, do as the Romans do*, the reality is that today, in the world of foreign corruption and the ever-expanding number of extra-jurisdictional pieces of anti-corruption legislation[5], businesses must operate according to the highest common denominator. Anti-corruption measures should be in line with the very highest standards of any and all applicable pieces of ABAC legislation.

The OECD Convention on Anti-bribery offers good practical guidance to assist companies in establishing effective internal controls, ethics and compliance programs, or measures for preventing and detecting the bribery of foreign public officials. In effect, it amounts to the international community providing a blueprint for international corporate responsibility. The OECD Convention recognizes that to be effective, such programs or measures should be interconnected with a company's overall compliance framework.

Guidance is, of course, taken not only from one's own experience – businesses are always encouraged to engage with counsel and other knowledgeable third parties in the geographic areas where they are engaged to ensure that all legal obligations are understood and followed.

Moreover, the ABAC policies produced should be widely available throughout a company and to any supplier or third-party partners. This reinforces the ABAC messaging and is an important part of creating a suitable anti-corruption environment.

[5] The U.S. *Foreign Corrupt Practices Act* (FCPA), the U.K. *Bribery Act* and Canada's *Corruption of Foreign Public Officials Act* (CFPOA), to name a few.