

# HELPDESK

PROVIDING ON-DEMAND RESEARCH TO HELP FIGHT CORRUPTION

## TRENDS IN ANTI-BRIBERY LAWS

### QUERY

Which countries have passed anti-bribery legislation recently, what are their key features, and what global trends do we detect in such legislation?

### PURPOSE

TI-UK has been working with a group of institutional investors to develop their awareness of corruption risk during the investment process. They have asked us to produce a short background paper on trends in anti-bribery legislation.

### CONTENT

1. Examples of countries that have recently passed anti-bribery legislation
2. Global trends in new anti-bribery legislation

////////////////////////////////////  
**Enquirer:** TI UK

#### Author(s)

Maira Martini, Transparency International,  
[mmartini@transparency.org](mailto:mmartini@transparency.org)

#### Reviewed by

Marie Chêne, Transparency International,  
[mchene@transparency.org](mailto:mchene@transparency.org); Robin Hodess,  
Transparency International,  
[rhodess@transparency.org](mailto:rhodess@transparency.org)

#### Date

Submitted: 22 February 2012  
Responded: 7 March 2012

**Number:** 24

### SUMMARY

Among other things, international conventions such as the OECD Anti-Bribery Convention and the United Nations Convention against Corruption (UNCAC), require signatory-countries to criminalise foreign bribery and cooperate with other countries during investigations. These conventions have played a major role in triggering and guiding recent domestic reforms, as the great majority of countries which have recently approved new anti-bribery regulation have done so to comply with the requirements of such conventions.

These countries include countries long regarded as having a corrupt business environment, such as Russia and China. Other countries such as Chile, Ireland, Israel, Luxembourg, Peru, the Slovak Republic, Spain, Turkey and Ukraine have also adopted new bribery related regulations in the past two years, while Brazil, India and Indonesia are currently discussing proposals to improve their anti-corruption legal framework.

The criminalisation of foreign bribery is among the most important trends that can be detected in these new regulations, with the majority of countries either criminalising foreign bribery (e.g.: China, Russia, Chile), or clarifying the scope of existing laws (e.g. Spain, Ireland, Israel). The issue of corporate liability also emerges as a trend, with a significant number of countries introducing criminal liability for legal entities (e.g.: Luxembourg, Slovak), and one country introducing (only) administrative liability for legal entities (Russia). Last but not least, several countries have adopted stronger penalties for bribery of both domestic and foreign public officials. Other changes include the criminalisation of commercial bribery (Ukraine/Russia), whistleblower protection (Ireland/Turkey), and the extension of the prescription period (Spain).

## 1. EXAMPLES OF COUNTRIES THAT HAVE RECENTLY PASSED ANTI-BRIBERY LEGISLATION

### Overview

Driven by the Watergate scandal<sup>1</sup>, in 1977, the U.S. Congress, approved the first ever Foreign Corrupt Practices Act (FCPA), criminalising bribery of foreign public officials. Since then, a substantial number of countries have reformed their anti-bribery legal framework to extend its scope and territoriality. More recently, international agreements have also played an important role in this debate and the majority of recent reforms aim at making domestic legislation compatible with obligations imposed under the OECD Anti-Bribery Convention and the UNCAC. For instance, reforms on bribery legislation have recently taken place in the United Kingdom (UK Bribery Act, 2010)<sup>2</sup>, as well as in other countries long regarded as having highly corrupt business environment, such as Russia and China (Transparency International's Bribe Payers' Index, 2011)

In particular, international conventions have been instrumental in helping shape the scope and extent of anti-corruption legislations around the world, but, most importantly in providing universal benchmarks to measure implementation progress in signatory countries (Chene, 2010). To date, 38 states are part of the OECD Convention on Preventing Bribery of Foreign Public Officials in International Business Transactions (OECD Anti-Bribery Convention)<sup>3</sup>, and 154 countries are parties to the United Nations Convention against Corruption. Both treaties require states parties to criminalise and to enforce their laws against bribery of foreign public officials, as well as to assist other states parties in investigating foreign bribery.

As signatory countries must transpose these international legal frameworks into their national law, their impact depends on effective implementation and enforcement of these laws.

<sup>1</sup> Please see *The Water Gate Story* by *The Washington Post*: <http://www.washingtonpost.com/wp-srv/politics/special/watergate/>

<sup>2</sup> As TI-UK is the inquirer, the UK Bribery Act is not covered in the answer. For more information please see: <http://www.fco.gov.uk/en/global-issues/conflict-minerals/legally-binding-process/uk-bribery-act>

<sup>3</sup> Russia has joined the OECD Convention in February 2012 and will be the 39<sup>th</sup> Party to the Convention on 17<sup>th</sup> April 2012. Please see: [http://www.oecd.org/department/0,3355,en\\_2649\\_34859\\_1\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/department/0,3355,en_2649_34859_1_1_1_1_1,00.html)

## Countries which have recently passed or amended anti-bribery legislation

### Chile

Chile has updated twice its anti-bribery legal framework in 2009. Firstly, Law n. 20,371 of 2009 amended the Organic Code to criminalise active bribery of foreign public officials by Chilean citizens or individuals residing in Chile (Getting the Deal Through, 2011; Noriega; Chile Transparente, 2011).

Secondly, the Law n. 20.371/2009 introduced criminal liability for legal persons for offences of bribing domestic and foreign public officials. Companies will be held criminal liable if the offence resulted from the breach of the legal person's direction and supervisory function. The penalties include fines ranging between US\$14,000 and US\$ 700,000, the dissolution of the company, the prohibition from entering into contracts with the public administration, the loss of fiscal subsidies, etc (Noriega; Chile Transparent, 2011).

However, the country still does not have any provision regulating commercial bribery (Noriega; Chile Transparent, 2011).

### China

In May 2011, China approved the Eighth Amendment to its Criminal Law Code, criminalising the payments made to non-Chinese government officials and to officials of international public organisations for any 'illegitimate commercial benefit' (Article 164). Prior to this amendment, the Chinese law only dealt with bribery of domestic public officials and commercial bribery within the country<sup>4</sup>.

The new provision has increased extra-territorial jurisdiction. It applies to all those residing in China, regardless of their nationality, to all Chinese citizens living abroad, as well as to companies and institutions registered under Chinese law, including foreign-owned enterprises operating in the country, joint ventures and Chinese companies overseas.

Among the sanctions for non-compliance with the law are detention and fines. Individuals and managers may face criminal detention of between three and ten years, and companies may be subject to fines (Transparency International, 2011). Moreover, the law does not provide for any exception, such as tolerance in case of facilitation payments (like in the US Foreign

<sup>4</sup> Please see: <http://thebriberyact.com/2011/05/30/from-may-1st-new-china-anti-corruption-laws-follow-long-arm-jurisdiction-trend/>

Corrupt Practices Act), or defences to be invoked by companies which have procedures designed to prevent such offences (e.g. compliance system – like in the UK Bribery Act).

### Ireland

In 2010, Ireland passed the Prevention of Corruption (Amendment) Act 2010. The new law broadens the scope of the Prevention of Corruption (Amendment) Act 2001 and aims at ensuring that the State is fully compliant with the terms of the OECD Anti-Bribery Convention (Transparency International, 2011). The main provisions of the 2010 Act are described below.

- Active bribery now includes the '*corruptly offer, whether for the benefit of the agent or another person, any gift, consideration or advantage*'. The word '*advantage*' was introduced to make clear that all types of advantages are illegal and fall within the scope of the Act.
- The term 'agent' now includes persons acting on behalf of the public administration of any foreign State, including those acting under the direct or indirect control of a foreign government, as well as agents of international organisations.
- A new definition of the term 'state' is also provided in the Act, explicitly extending the jurisdiction and scope of the legislation to officials of regional or local authorities of other countries, or of their dependent territories.
- Extra-territorial jurisdiction for the offence of corruption was also extended to Irish citizens, Irish residents, Irish registered companies, and other corporate bodies established under the laws of Ireland. As opposed to the UK foreign bribery Act, the law does not apply to non-Ireland companies doing business in the UK.
- New provisions on whistleblower protection were included. Employees who report suspected corruption offences in good faith will be protected from penalisation by employers.
- Individual and legal entities are liable for corruption related offences. The Act expanded this liability also to unincorporated bodies (associations which are not legal entities).

Please see the Prevention of Corruption (Amendment) Act 2010 available at: <http://www.irishstatutebook.ie/2010/en/act/pub/0033/index.html>

### Israel

In Israel provisions with regards to domestic and foreign bribery have been in place since 1977 (art. 291, Penal Law). A broad interpretation of the law had weakened its implementation overtime, particularly with regards to bribery of foreign officials.

In this context, Israel adopted in 2010 a new legislation which explicitly states that bribery of public officials of foreign countries and of internationals and political entities, including the Palestinian Authority is prohibited. The law also determines that nationality jurisdiction for the foreign bribery offence is applicable even in countries where such act is not considered an offence (OECD, 2011).

As to exceptions or defences, a circular issued by the Tax Authority in 2011 reiterates the country's commitment to the fight against corruption. The circular clarifies that any payment made to domestic or foreign public officials in violation of any law is not tax deductible (Transparency International, 2011).

The law has also established stricter sanctions for bribery of both domestic and foreign public officials. Individuals found guilty of active bribery may face detention of up to seven years and a maximum fine of 1,010,000 ILS (approximately 265,000 US Dollars). Legal entities may face a maximum fine of 2,020,000 ILS (approximately 532,000 US Dollars) or up to four times the benefit obtained with the bribery (OECD, 2011).

Please see '*Governing Resolutions Concerning the Anti Bribery Convention*' available at: <http://www.justice.gov.il/MOJEng/Mankal/Corruption/The+Offence+of+Bribery+to+a+Foreign+Official.htm>

### Luxembourg

Luxembourg last updated its anti-bribery legal framework in 2010. As required by international legal instruments such as the OECD Anti-Bribery Convention, the country introduced corporate liability in the case of bribery, which makes natural persons and legal entities (private/public companies, profitable/non-for profit) criminally liable if a breach is committed on their behalf and interest (PricewaterhouseCoopers, 2010).

## Peru

In 2009, Peru approved regulation criminalising active bribery of foreign officials. According to the new law *“active transnational bribery occurs when someone offers, gives, or promises, directly or indirectly, to a public official or servant of another state or of a public international organisation, a donation, promise, advantage or benefit, which benefits him or a third party, in order to make the public official perform or omit any act, in violation or not of his duties, which, in any form, helps obtaining or retaining a business transaction or gives an advantage in the realisation of international commercial and economic businesses”* (Article 397-A Criminal Code).

However, the new regulation does address neither passive transnational bribery nor criminal liability of legal entities (Huaita; Proetica; National Council for Public Ethics, 2011).

## Russia

In May 2011, Russia adopted new amendments expanding the scope and territoriality of its anti-bribery legal framework. The law criminalises active and passive bribery of government officials, foreign governmental officials, or officials of international organisations as well as commercial bribery, pushing the country to the accession to the OECD Anti-Bribery Convention in February 2012, which is a pre-requisite for the full membership to the OECD sought by Russia (OECD website, 2012).

Sanctions for both domestic and foreign bribery were significantly increased. According to the article 290 of the Criminal Code, which prohibits acceptance of bribes directly or through intermediaries, fines were broken down in categories depending on the conduct of the individual involved and the amount of the bribe. Thus, fines may range from 25 times the bribe amount in “less serious” cases to 100 times the bribe amount if the amount paid as a bribe is greater than one million Russian Rubles (approximately US\$ 33,734.00). Alternatively, individuals may also be punished with prison terms (up to 15 years) and fines, or be restricted from occupying certain positions in government (Federal Law of May 2, 2011)<sup>5</sup>.

<sup>5</sup>Federal Law of May 4, 2011 n. 97-FZ ‘On Amendments to the criminal code of the Russian Federation and the Russian Federation Code of Administrative offences in connection with the improvement of public administration in fighting corruption’ available at: <http://translate.google.com.br/translate?hl=pt-BR&sl=ru&tl=en&u=http%3A%2F%2Fwww.garant.ru%2Fhotlaw%2Ffederal%2F322636%2F>

As to active bribery, the law establishes similar sanctions to individuals giving a bribe (directly or through intermediaries), with fines ranging from 15 to 90 times the bribe amount, and prison terms up to 12 years (Art. 291, Federal Law of May 2, 2011).

The term “foreign governmental official” applies to any appointed or elected official who has a position in any legislative, executive, administrative or judicial branch of a foreign country or an individual who serves any public function for a foreign country or a public agency or a public enterprise.

Companies can be held liable for bribery committed for their benefit or paid on their behalf. However, the law introduced only administrative liability for legal entities, meaning that companies which pay bribes to foreign officials can be fined up to 100 times the amount of the bribe (when the bribe at issue is over 20 million Russian Rubles, approximately US\$ 673,460.00). In this case, there are no criminal sanctions in place (Sidley Austin, 2011; Federal Law of May 2, 2011).

Moreover, with regards to extra-territoriality, there is no indication that the law would not apply to foreign companies doing business in the country. In this context, it is expected that foreign companies engaged in foreign or commercial bribery in Russia will be subject to fines (Chester, 2011).

## Slovak Republic

The Slovak Republic amended its Criminal Code in April 2010 to introduce corporate liability for foreign bribery. The new provisions entered into force in September 2010 (OECD, 2010).

## Spain

Spain amended its Penal Code in 2010, expanding its anti-bribery provisions. Among the changes, noteworthy is the establishment of bribery of foreign public official as an autonomous crime, the criminalisation of active and passive commercial bribery (private-to-private bribery) as well as the adoption of criminal liability for companies that bribe public foreign officials (Goundry; Hunt, 2011).

The new law has also established stricter sanctions (up to six years imprisonment and fines) for those engaged in bribery, and has extended the statute of limitation (period of prescription) to ten years (Conference of the State Parties of the United Nations Convention against Corruption, 2011).

## Turkey

Turkey has implemented several reforms in the past years with the aim of fulfilling the requirements of the OECD Anti-Bribery convention. Noteworthy is (i) the re-establishment of corporate liability for foreign bribery; (ii) the introduction of whistleblower protections for private and public-sector employees; (iii) the explicit prohibition on tax deductions for bribe payments; (iv) the abolishment of defences for bribers who report their crime to law enforcement authorities (OECD, 2010)

## Ukraine

Ukraine adopted a new anti-corruption law in 2011 which addresses several issues related to conflict of interest and corruption, including the criminalisation of commercial bribery. Yet, the legislation does not cover corporate liability. Therefore, legal entities are still not held liable for corrupt acts (Halyna Kokhan; Creative Union TORO, 2011).

According to the new law, decisions of any state body (e.g. permits, licenses, registrations, etc) taken as the result of a corruption offence may be cancelled by a superior body or challenged in court by an interested party (ABLV, 2011).

## United Kingdom

The United Kingdom adopted the Bribery Act in April 2010, which came into effect in July 2011. It introduces a new corporate liability offence of failure to prevent bribery. This new criminal offence places a burden of proof on companies to show they have adequate procedures in place to prevent bribery. A company is guilty of an offence if an 'associated person' carries out an act of bribery in connection with its business. A person will be 'associated with' the company where that person performs services for or on behalf of an organisation (this could include an employee, subsidiary, intermediary or supplier).

The Bribery Act also provides for strict penalties for active and passive bribery by individuals as well as companies: an individual guilty of an offence would be liable to imprisonment for up to ten years or an unlimited fine, or both. A company would face an unlimited fine and potentially debarment from tendering for government contracts.

The Bribery Act has extra-territorial reach both for UK companies operating abroad and for overseas companies with a presence in the UK. A company can commit an offence under section 7 of failure to prevent bribery if an employee, subsidiary, agent or service provider ('associated persons') bribes another

person anywhere in the world to obtain or retain business or a business advantage. A foreign subsidiary of a UK company can cause the UK parent company to become liable under section 7 when the subsidiary commits an act of bribery in the context of performing services for the UK parent. If the foreign subsidiary were acting entirely on its own account it would not cause the UK parent to be liable for failure to prevent bribery under section 7 as it would not then be performing services for the UK parent. However, the UK parent might still be liable for the actions of its subsidiary in other ways such as false accounting offences or under the Proceeds of Crime Act 2002.

The Bribery Act has important implications for foreign companies which do business in the UK as its territorial scope is extensive. A foreign company which carries on any part of its business in the UK could be prosecuted for failure to prevent bribery even where the bribery takes place wholly outside the UK and the benefit or advantage to the company is intended to accrue outside the UK. Directors and senior officers of a company have personal liability under section 14 of the Bribery Act. This provides that if an offence under sections 1, 2 and 6 (bribes given or received) is proved to have been committed by a body corporate with the *consent or connivance* of a director or senior officer, then the director or officer would be guilty of an offence as well as the company which paid the bribe. If the offence is committed wholly outside the UK, then the director may only be prosecuted if he or she has 'a close connection' with the UK.

One of the important provisions of the Bribery Act is that facilitation payments remain illegal. Promotional expenses include gifts, hospitality and expenses may also be covered by the Act if they are effectively bribes.

## Countries which are currently discussing new anti-bribery legislation

### Brazil

Brazil has a relatively strong anti-bribery legal framework, but still lacks corporate liability and whistleblower protection provisions. In the country, only individuals and not entities can be held criminally liable for bribery, even if a company is the ultimate beneficiary of the offence.

In 2010, the Office of the Comptroller General has prepared a Draft Law on the '*Responsibility of Legal Persons*' to establish the direct responsibility of legal entities for the acts of corruption committed against

the Government and/or Foreign Administration<sup>6</sup>. The new draft law also makes corporations liable for the acts of their directors, officers, employees, and agents (Transparency International, 2011; Roux, 2011).

While the law does not introduce criminal but administrative and civil liability for legal entities, it is still considered as a step forward, since companies will be subject, for the first time in this jurisdiction, to legal liability arising from corrupt practices (Transparency International, 2011; Amarrigo Brasil, *Forthcoming*). Moreover, according to experts, the administrative and civil sanctions provided for are proportionate and dissuasive (e.g. debarment from contracting with the public sector; fines up to 30% of a company's income, etc) (Amarrigo Brasil, *Forthcoming*).

The draft bill also establishes that the government should take into account voluntary disclosure, cooperation with government investigations, the existence of pre-existing and effective compliance programs, among other factors, when determining sanctions (Article 9, Bill n. 6826)<sup>7</sup>.

## India

India already has in place a framework for combating corruption under certain laws, such as the Prevention of Corruption Act, 1988 and the Prevention of Money-laundering Act, 2002. However, the bribery of foreign public officials is still not covered.

In 2011, the government put forward the Prevention of Bribery of Foreign Public Officials and Officials of Public International Organisations Bill. The proposed legislation criminalises active and passive bribery of foreign public officials or officials of public organisation and establishes fines and imprisonment (from six months up to seven years) as punishment.

Please see the Prevention of Bribery of Foreign Public Officials and Officials of Public International Organisations Bill available at: [http://164.100.47.5/newcommittee/press\\_release/bill/Committee%20on%20Personnel,%20PublicGrievances,%20Law%20and%20Justice/Prevention%20of%20Bribery,%2026%20of%202011.pdf](http://164.100.47.5/newcommittee/press_release/bill/Committee%20on%20Personnel,%20PublicGrievances,%20Law%20and%20Justice/Prevention%20of%20Bribery,%2026%20of%202011.pdf)

<sup>6</sup> Please see (in Portuguese): <http://www.cgu.gov.br/ConselhoTransparencia/Documentos/Atas/ExtratodaAta11.asp>

<sup>7</sup> Please see (in Portuguese): <http://www.camara.gov.br/proposicoesWeb/fichadetramitacao?idProposicao=466400>

## Indonesia

In Indonesia, the law on the Eradication of Corruption (Law n. 20, 2001) criminalises active and passive bribery in the public sector, but it does not include provisions on foreign public officials and neither on private-to-private bribery (Business Anti-Corruption Portal, 2011).

In 2011, the government presented a new Anti-Corruption Bill which, if adopted, will cover commercial bribery as well as bribery of foreign public officials. The law still has to be approved by the House of Representatives (Palazzolo, 2011).

## 2. GLOBAL TRENDS IN NEW ANTI-BRIBERY LEGISLATION

Based on the above examples, five main trends can be detected:

(i) Enactment of **regulations related to bribery of foreign public officials**. Seven out of 11 countries have either criminalised bribery of foreign public officials (FPOs) or clarified the scope of existing legislation to cover FPOs. More specifically, Russia, China, Chile and Peru are among the countries which have criminalised bribery of foreign public officials recently. Spain, Israel and Ireland have introduced changes to clarify the scope of their former legislation, and India and Indonesia are currently discussing proposals which aim at criminalising foreign bribery. This reflects the increasingly international nature of business, and the fact that much previous anti-bribery legislation had been designed to cover domestic corruption.

(ii) Introduction of **corporate liability**. A number of countries have adopted measures to establish the liability of legal persons (i.e. companies) for bribery offences. While the majority of countries have adopted legislation introducing *criminal* liability of legal persons (Turkey, Slovak, Spain, Chile and Luxembourg) others such as Russia have only established *administrative* liability. The Brazilian government has also proposed legislation introducing *administrative and civil* liability for legal entities for bribery.

(iii) **Sanctions and penalties**. Countries such as Russia, Israel, Spain, Turkey, Ukraine and the UK have adopted stronger penalties for corruption related offences. The countries analysed punish bribery offences with fines and/or prison terms. Some countries have limited monetary sanctions, which are often determined in relation to the amount paid as a bribe. As complementary sanctions to fines and imprisonment, countries have enacted regulations disqualifying offenders from contracting with the public

administration (Chile), restricting them from occupying certain positions in the government (Russia), or cancelling decisions taken as the result of a corruption offence (Ukraine).

(iv) **Extra-territoriality.** The principle of extra-territoriality is incorporated into many laws, such that bribes that are paid overseas can be prosecuted in a company's home jurisdiction. Likewise, jurisdiction is typically extended in whole or part to foreign-owned or listed companies. For example, non-Chinese and non-Russian companies can be held liable for a failure to prevent bribery if they do business in China and Russia, respectively. The legal community has expressed some concern about the use of extra-territorial provisions as they may be open to political manipulation.

(v) **Extension of legislation to cover agents and intermediaries,** closing loopholes that were previously exploited. For example, the UK Bribery Act covers 'associated persons' connected with a company, to prevent companies deliberated outsourcing the payment of bribes.

Other changes in anti-bribery legislation are related to whistleblower protection (Ireland, Turkey), criminalisation of commercial bribery (Ukraine and Russia) and extension of the statute of limitation (prescription period) (Spain).

### 3. REFERENCES

ABLV, 2011. Ukraine's new Anti-Corruption Law. <http://www.ablv.com/en/press/advisory/date/2011/07/19/ukraine-s-new-anti-corruption-law>

ADB/OECD Anti-Corruption Initiative for Asia and the Pacific, 2011. *The Criminalisation of Bribery in Asia and the Pacific: Frameworks and Practices in 28 Jurisdictions*. OECD.

Amarribo Brasi, *Forthcoming. UN Convention against Corruption Civil Society Review*. Amarribo Brasil and the UNCAC Coalition.

Chene, M., 2010. *International Good Practice in Anti-Corruption Legislation*. U4 Helpdesk Answer.

Chester, M., 2011. *Russia FCPA: The Law has been signed, will the culture change result?* FCPA Professor. <http://www.fcprofessor.com/category/international-initiatives>

CMS, 2011. *Anti-Bribery and Corruption laws: An International Guide*. <http://www.law->

[now.com/cmck/pdfs/nonsecured/antibriberyinternationalalaug11.pdf](http://www.now.com/cmck/pdfs/nonsecured/antibriberyinternationalalaug11.pdf)

Conference of the State Parties of the United Nations Convention against Corruption, 2011. *Review of implementation of the United Nations Convention against Corruption: Finland and Spain*. [HTTP://WWW.UNODC.ORG/DOCUMENTS/TREATIES/UNCAC/WORKINGGROUPS/IMPLEMENTATIONREVIEWGROUP/7-9SEPTEMBER2011/V1183525E.PDF](http://www.unodc.org/documents/treaties/uncac/workinggroups/implementationreviewgroup/7-9september2011/v1183525e.pdf)

Conference of the State Parties of the United Nations Convention against Corruption, 2011. *Review of the implementation of the United Nations Convention against Corruption: criminalization and law enforcement and international cooperation*. [HTTP://WWW.UNODC.ORG/DOCUMENTS/TREATIES/UNCAC/COSP/SESSION4/V1185288E.PDF](http://www.unodc.org/documents/treaties/uncac/cosp/session4/v1185288e.pdf)

Dell, G., 2012. *Russia Confirms plans to join OECD Convention against Bribery*. Space for Transparency. [HTTP://BLOG.TRANSPARENCY.ORG/2012/02/06/RUSSIA-CONFIRMS-PLANS-TO-JOIN-THE-OECD-CONVENTION-AGAINST-BRIBERY/](http://blog.transparency.org/2012/02/06/russia-confirms-plans-to-join-the-oecd-convention-against-bribery/)

Fagan, C. 2010. Elements of Information on China and Enforcement of Anti-Corruption laws. U4 Helpdesk. [HTTP://WWW.U4.NO/PUBLICATIONS/ELEMENTS-OF-INFORMATION-ON-CHINA-AND-ENFORCEMENT-OF-ANTI-CORRUPTION-LAWS-ABROAD/](http://www.u4.no/publications/elements-of-information-on-china-and-enforcement-of-anti-corruption-laws-abroad/)

Financial Integrity and Economic Development Task Force, 2012. *Russia Joins OECD Anti-Bribery Convention*. [HTTP://WWW.FINANCIALTASKFORCE.ORG/2012/02/24/OECD-RUSSIA-JOINS-OECD-ANTI-BRIBERY-CONVENTION/](http://www.financialtaskforce.org/2012/02/24/oecd-russia-joins-oecd-anti-bribery-convention/)

Getting the Deal Through, 2010. *Anti-Corruption Regulation in 47 Jurisdictions worldwide*. Law Business Research Ltd.

Getting the Deal Through, 2011. *Anti-Corruption Regulation: Chile*. [HTTP://WWW.WORLDSERVICESGROUP.COM/PUBLICATIONS.ASP?ACTION=ARTICLE&ARTID=3924](http://www.worldservicesgroup.com/publications.asp?action=article&artid=3924)

Goundry, J.; Hunt, O., 2011. *Spain: Law Reform Reflects Wider Changes in Attitudes to Corruption*. Billiter Partners. [HTTP://WWW.BILLITERPARTNERS.COM/WP-CONTENT/UPLOADS/2011/04/SPAIN-LAW-REFORM-REFLECTS-WIDER-CHANGES-IN-ATTITUDES-TO-CORRUPTION-APRIL-2011.PDF](http://www.billiterpartners.com/wp-content/uploads/2011/04/spain-law-reform-reflects-wider-changes-in-attitudes-to-corruption-april-2011.pdf)

Halyna Kokhan; Creative Union TORO Ukraine, 2011. *UN Convention Civil Society Review: Ukraine 2011*.

Huaita, M.; Proetica; National Council for Public Ethics, 2011. UN Convention against Corruption. Civil Society Review: Peru 2011. Proetica and the UNCAC Coalition.

Mark, R.; Bullock, P., 2011. *From May 1<sup>st</sup> new China anti-Corruption laws follow long arm corruption Jurisdiction*. The Bribery Act. [HTTP://THEBRIBERYACT.COM/2011/05/30/FROM-MAY-1ST-NEW-CHINA-ANTI-CORRUPTION-LAWS-FOLLOW-LONG-ARM-JURISDICTION-TREND/](http://THEBRIBERYACT.COM/2011/05/30/FROM-MAY-1ST-NEW-CHINA-ANTI-CORRUPTION-LAWS-FOLLOW-LONG-ARM-JURISDICTION-TREND/)

McClellan, A. 2011. *G20 Action against Foreign Bribery*. G20 Leading on Anti-Corruption? The view from civil society. Space for Transparency. [HTTP://BLOG.TRANSPARENCY.ORG/2011/05/24/G20-ACTION-AGAINST-FOREIGN-BRIBERY/](http://BLOG.TRANSPARENCY.ORG/2011/05/24/G20-ACTION-AGAINST-FOREIGN-BRIBERY/)

Noriega, R.; Chile Transparente, 2011. *UN Convention against Corruption Civil Society Review*. Chile Transparente and the UNCAC Coalition.

OECD, 2011. *Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and Related Documents*. [HTTP://WWW.OECD.ORG/DATAOECD/4/18/38028044.PDF](http://WWW.OECD.ORG/DATAOECD/4/18/38028044.PDF)

OECD, 2011. *Steps taken to implement and enforce the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions: Israel*. <http://www.oecd.org/dataoecd/28/33/44324083.pdf>

OECD, 2010. *Working Group on Bribery Annual Report*. [http://www.oecd.org/document/46/0,3746,en\\_2649\\_34859\\_44271086\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/document/46/0,3746,en_2649_34859_44271086_1_1_1_1,00.html)

Palazzolo, J., 2011. *Indonesia moves ahead with Foreign Bribery Legislation*. The Wall Street Journal, March 16, 2011. <http://blogs.wsj.com/corruption-currents/2011/03/16/indonesia-moves-ahead-with-foreign-bribery-legislation/>

PriceWaterhouseCoopers, 2010. *Corporate Criminal Liability: Introduction in the Luxembourg Criminal Code*. [HTTP://WWW.PWC.LU/EN/TAX-CONSULTING/DOCS/PWC-TAX-090410.PDF](http://WWW.PWC.LU/EN/TAX-CONSULTING/DOCS/PWC-TAX-090410.PDF)

Riella, Amy; et. al., (no year). *The War on Bribery goes Global: Recent Developments and Enforcement Trends in the International Anti-Corruption Arena*. [HTTP://WWW.VELAW.COM/UPLOADEDFILES/VESITE/RESOURCES/WARONBRIBERYGOESGLOBAL.PDF](http://WWW.VELAW.COM/UPLOADEDFILES/VESITE/RESOURCES/WARONBRIBERYGOESGLOBAL.PDF)

Roux, R., 2011. *Anti-corruption Enforcement in Brazil takes a step forward, but it need to take more*. The Anticorruption Blog. [HTTP://WWW.ANTICORRUPTIONBLOG.COM/COMMERCIAL-BRIBERY/ANTICORRUPTION-ENFORCEMENT-IN-BRAZIL-TAKES-A-STEP-FORWARD-BUT-IT-NEEDS-TO-TAKE-MORE/](http://WWW.ANTICORRUPTIONBLOG.COM/COMMERCIAL-BRIBERY/ANTICORRUPTION-ENFORCEMENT-IN-BRAZIL-TAKES-A-STEP-FORWARD-BUT-IT-NEEDS-TO-TAKE-MORE/)

Sidley Austin, 2011. *Anti Corruption Quarterly*. [HTTP://WWW.SIDLEY.COM/FILES/NEWS/2ABBE62E-F926-4E6F-A4B4-003CF2974908/PRESENTATION/NEWSATTACHMENT/3268A153-B791-4B5B-BE71-00EC885D9F3D/SIDLEYAUSTIN ANTICORRUPTIO NQUARTERLY VOL2 2011.PDF#PAGE=1](http://WWW.SIDLEY.COM/FILES/NEWS/2ABBE62E-F926-4E6F-A4B4-003CF2974908/PRESENTATION/NEWSATTACHMENT/3268A153-B791-4B5B-BE71-00EC885D9F3D/SIDLEYAUSTIN_ANTICORRUPTIO NQUARTERLY VOL2 2011.PDF#PAGE=1)

Transparency International, 2011. *Progress Report 2011: Enforcement of the OECD Anti-Bribery Convention*.

Transparency International, 2011. *Bribe Payers Index*. [HTTP://BPI.TRANSPARENCY.ORG/RESULTS/](http://BPI.TRANSPARENCY.ORG/RESULTS/)