Global Enforcement Report 2011
TRACE Anti-Bribery Compliance Solutions
2011

OBJECTIVE:
To show a county’s commitment to anti-bribery enforcement by providing a summary of all known international anti-bribery enforcement actions.

METHODS USED:
The information found in the report has been collected by TRACE from court documents, company public filings, press releases, news reports, and other publicly- available information.

KEY FINDINGS:
• Due to the SEC’s new probes into financial firms over possible bribery connections, the financial services sector has recently been a subject to a rapid increase in enforcement. Going from having 11 cases to 26 in one year.
• Foreign bribery enforcement by countries other than the U.S. fell in 2010 while the U.S. more than doubled their figures in the same year.
• The U.S. has pursued 3.5 cases for every one pursued by all other countries since 2000.
• From 1977-2011, 24 countries have pursued 632 bribery enforcement actions. The U.S. pursued 74.1% of all actions followed by the U.K. with 5.1%.
• The United States has pursued Foreign Corruption Practices Act actions against a large number of foreign companies. Over 20% of them are companies headquartered outside the U.S. Swiss entities had the largest number of cases (25%) followed by Dutch entities (13%).
• 164 bribery enforcement actions were pursued by countries other than the U.S. from 1977-2011. The United Kingdom undertook 19.5% of all foreign bribery enforcement actions, followed by Germany with 12.2%.
• Outside the U.S., Nigeria (11.1%), Italy (9.3%), and South Korea (7.4%) are the leaders when it comes to enforcement against bribery of their own government officials by foreign companies.
• China had the highest number of international enforcement actions involving payments to government officials with 7% of the cases. Iraq following with 6.5%, due to the investigations surrounding the United Nations Oil-for-Food program which accounts for most of the actions there.
• With 19.4% of the world’s bribery enforcement activity, the extractive industries had the highest number followed by the aerospace, defense, and security industry (12.3%), manufacturer and service provider industry (12%), and the health care industry (12%).

Full Report