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978-1-107-03574-4 - The Oecd Convention on Bribery: A Commentary: 2nd Edition

Edited by Mark Pieth, Lucinda A. Low and Nicola Bonucci

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THE OECD CONVENTION ON BRIBERY

The OECD Convention on Bribery established an international standard for compliance with anti-corruption rules, and has subsequently been adopted by the thirty-four OECD members and six non-member countries. As a result of the Convention and national implementation laws, companies and managers now risk tough sanctions if they are caught bribing foreign officials. The UK Bribery Act 2010 is only one example of this development. The second edition of this, the only commentary on the Convention, provides law practitioners, company lawyers and academic researchers with comprehensive guidance on the OECD standards. It includes case examples as well as the FCPA Resource Guide 2012 and the 2009 OECD Recommendation for Further Combating Bribery of Foreign Public Officials with Annexes I and II.

MARK PIETH is Professor of Criminal Law at Basel University and Chairman of the OECD Working Group on Bribery in International Business Transactions. He serves as a Member of the Integrity Advisory Board of The World Bank Group (IAB), and is the founder and Chairman of the Board of the Basel Institute on Governance (BIG).

LUCINDA A. LOW is a partner in the Washington, DC office of Steptoe & Johnson LLP, where she heads the firm's anti-corruption practice. Her practice includes advice and counsel to companies in preventing and mitigating risks of corruption in international business transactions and operations, conducting internal corporate investigations, and representation of companies in government and World Bank and other IFI investigations and enforcement actions.

NICOLA BONUCCI is the OECD Director for Legal Affairs and the coordinator for accession. He focuses on general public international law issues, participating in the negotiation of international agreements, interpreting the basic texts of the Organisation, and providing legal opinions. Since 1997 he has been closely involved in the monitoring and follow-up of the OECD Convention on Bribery.

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THE OECD CONVENTION ON BRIBERY

A Commentary

*A Commentary on the Convention on Combating Bribery of Foreign Public Officials
in International Business Transactions of 21 November 1997*

2ND EDITION

Edited by

MARK PIETH, LUCINDA A. LOW

and

NICOLA BONUCCI

Co-ordination: KATHRIN BETZ



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FOREWORD

The OECD Anti-Bribery Convention is the first and only legally binding instrument to focus on the supply of bribes to foreign public officials. Countries that are party to the Convention must prosecute individuals and companies that offer, promise or give bribes to foreign public officials, and subject those individuals and companies to effective penalties, including heavy fines or even imprisonment.

Parties to the Convention recognise that bribing foreign public officials to win advantages in cross-border business transactions is in no one's interest. They agree to measure themselves against the world's highest and toughest standards for fighting this crime, as well as engaging in a rigorous system of peer review.

The Convention is integral to the OECD's mission to create a stronger, cleaner and fairer world economy. Since 2006, when I joined the OECD as Secretary-General, the number of Parties to the Convention has grown to include Colombia, Israel, the Russian Federation and South Africa. More countries may join.

The global anti-bribery movement, which truly began with the Convention's entry into force in 1999, has also grown with the entry into force of the UN Convention Against Corruption (UNCAC) and the adoption of the G20 Anti-Corruption Action Plan in 2010. Both call upon member countries to criminalise foreign bribery.

The publication of this second edition of the commentary to the OECD Anti-Bribery Convention coincides with the fifteenth anniversary of the Convention and captures well the important evolution that has taken place over the years. The commentary is written by practitioners as well as academics, and provides both communities with an exhaustive review of the authoritative work undertaken by the Conference of States Parties to the Convention (the OECD Working Group on Bribery) in its country evaluation reports. It highlights the great achievements made to date, but also identifies what remains to be done.

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In the fight against foreign bribery, this commentary provides useful guidance on the standards set forth in the Anti-Bribery Convention, drawing on the experiences of the countries that have implemented the Convention's principles in their national laws. The bribery of foreign public officials in international business transactions is a crime that distorts business markets, undermines good governance and hurts the world's poorest and most vulnerable.

The momentum created by the Convention must continue so that, together, we can prevail in the fight against corruption and put in place better policies for better lives.

Angel Gurría
Secretary-General of the OECD

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I also would like to thank Ms Kirstin Bentley and Ms Michelle Seiler for their role in finalising the manuscript.

Last but not least, on behalf of the editors, I would like to thank Ms Finola O'Sullivan of Cambridge University Press for her essential support and encouragement.

OECD texts, national laws and cases have been included in this book up to 30 April 2013.

Mark Pieth
Co-ordinating Editor

ABBREVIATIONS

General abbreviations

ACE	Agreed Common Elements of Criminal Legislation and Related Action
ADB	Asian Development Bank
AI	Amnesty International
APG	Asia/Pacific Group on Money Laundering (OECD)
ASEAN	Association of South-East Asian Nations
ASIL	American Society of International Law
B20	Business Twenty
BCBS	Basel Committee on Banking Supervision
BGE	Bundesgerichtsentscheid (Federal Court Decision, Switzerland)
BGH	Bundesgerichtshof (Federal Court of Justice, Germany)
BGHSt	Entscheidungen des Bundesgerichtshofes in Strafsachen (Decisions of the German Federal Court of Justice in Criminal Matters)
BIAC	Business and Industry Advisory Committee (OECD)
BIG	Basel Institute on Governance
BIS	Bank for International Settlements
BVerfG	Bundesverfassungsgericht (Federal Constitutional Court, Germany)
BVerfGE	Bundesverfassungsgerichtsentscheid (Federal Constitutional Court Decision, Germany)
CATF	Chemical Action Task Force
CBCA	Canada Business Corporations Act
CC	Criminal Code
CDD	Customer Due Diligence
CDU	Christlich Demokratische Union (Christian Democratic Union) (Germany)
CEO	Chief Executive Officer
CFA	Committee on Fiscal Affairs (OECD)
CFATF	Caribbean Financial Action Task Force
CFO	Chief Financial Officer
CFPOA	Corruption of Foreign Public Officials Act (CA)
CHF	Swiss Francs

ABBREVIATIONS

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CIHEAM	Centre International de Hautes Études Agronomiques Méditerranéennes (International Centre for Advanced Mediterranean Agronomic Studies)
CIME	Committee on Investment and Multinational Enterprises (OECD)
COE	Council of Europe
COMSEC	Commonwealth Secretariat
COSO	Committee of Sponsoring Organizations of the Treadway Committee
CoSP	Conference of States Parties
CPC	Criminal Procedure Code
CPS	Code for Crown Prosecutors (England and Wales)
CSR	corporate social responsibility
DAC	Development Assistance Committee (OECD)
DAF	Directorate for Financial and Enterprise Affairs (OECD)
DAFFE	Directorate for Financial, Fiscal and Enterprise Affairs (OECD)
DOJ	Department of Justice (US)
DPA	deferred prosecution agreement
DPCI	Directorate for Priority Crime Investigation (South Africa)
DSO	Directorate of Special Operations (South Africa)
EC	European Communities
ECG	Export Credits Group (OECD)
ECGD	Export Credit Guarantee Department (UK)
ECOSOC	Economic and Social Council (UN)
ERA	Europäische Rechtsakademie Trier (Academy of European Law Trier)
ESAAMLG	Eastern and Southern African Anti-Money Laundering Group
ETS	European Treaty Series
EU	European Union
EUR	Euro
EWHC	High Court of England and Wales
FAO	Food and Agriculture Organization of the United Nations
FATF	Financial Action Task Force on Money Laundering
FCPA	Foreign Corrupt Practices Act (US)
FDI	foreign direct investment
FIFA	Fédération Internationale de Football Association
FINTRAC	Financial Transactions Reports Analysis Centre of Canada
FIU	Financial Intelligence Unit
FSB	Financial Stability Board
FSF	Financial Stability Forum
GAAP	Generally Accepted Accounting Principles
GAFISUD	Grupo de Acción Financiera Internacional Sudamericano (South American Financial Action Task Force)

GAO	Government Accountability Office (US)
GATT	General Agreement on Tariffs and Trade (WTO)
GCA	Global Coalition for Africa
GRECO	Group of States Against Corruption
GRS	Global Relations Strategy
HRW	Human Rights Watch
IAASB	International Auditing and Assurance Standards Board
IAB	Integrity Advisory Board of the World Bank Group
IACC	International Anti-Corruption Conference
IAP	International Association of Prosecutors
IAS	International Accounting Standards
IBA	International Bar Association
IBC	International Business Corporation
ICAR	International Center for Asset Recovery
ICC	International Chamber of Commerce
ICFTU	International Confederation of Free Trade Unions
ICRC	International Committee of the Red Cross
IDRC	International Development Research Centre
IESBA	International Ethics Standards Board for Accountants
IFAC	International Federation of Accountants
IFI	international financial institution
IFRS	International Financial Reporting Standard
IGO	intergovernmental organisation
ILA	International Law Association
ILC	International Law Commission
IMAC	(Federal Act on) International Mutual Assistance in Criminal Matters (Switzerland)
IMF	International Monetary Fund
INT	Integrity Vice-Presidency (World Bank)
IOC	International Olympic Committee
IOSCO	International Organization of Securities Commissions
IPU	Inter-Parliamentary Union
ISA	International Standards on Auditing
ISO	International Organization for Standardization
JIT	Joint Investigation Team
JPY	Japanese Yen
LCEW	Law Commission of England and Wales (UK)
LFPC	Law on Forfeiture of Proceeds of Crime (Bulgaria)
LRAI	Law on Restitution of Illicit Assets (Switzerland)
M&A	mergers and acquisitions
MDB	Multilateral Development Bank
MDP	Ministry of Defence Police (UK)

ABBREVIATIONS

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MENAFATF	Middle East and North Africa Financial Action Task Force
METI	Ministry of Economy, Trade and Industry (Japan)
MLA	mutual legal assistance
MLAT	Mutual Legal Assistance Treaties
MLLA	Mutual Legal Assistance Agreements
MNE	multinational enterprise
MOJ	Ministry of Justice (UK)
NATO	North Atlantic Treaty Organization
NGO	non-governmental organisation
NOK	Norwegian Crowns
NPA	non-prosecution agreement
OAS	Organization of American States
OECD	Organisation for Economic Co-operation and Development
OFAC	Office of Foreign Assets Control (US Treasury Department)
OFC	off-shore financial centre
OI	Oxfam International
OJ	Official Journal
OLAF	Office pour la lutte anti-fraude (European Anti-Fraud Office)
OPR	Opinion Procedure Release
OSCE	Organization for Security and Co-operation in Europe
OWiG	Ordnungswidrigkeitengesetz (Administrative Offences Act, Germany)
PA	plea agreement
PACI	Partnering Against Corruption Initiative (WEF)
PEP	politically exposed person
PGC	Public Governance Committee (OECD)
POCA	Proceeds of Crime Act (UK)
POLISARIO	Frente Popular de Liberación de Seguí el Hamra y Río de Oro (Polisario Front)
PP	Participation Plan
Rn.	Randnummer (marginal number)
s.	Section
SEC	Securities and Exchange Commission (US)
SFO	Serious Fraud Office (UK)
SIGMA	Support for Improvement in Governance and Management (OECD)
SME	small and medium-sized enterprise
SOE	state-owned enterprise
StAR	Stolen Asset Recovery Initiative (World Bank/UNODC)
STR	Suspicious Transaction Report
TFEU	Treaty on the Functioning of the EU
TI	Transparency International
TNB	transnational anti-bribery

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TRACE	Transparent Agents and Contracting Entities
TRACFIN	Traitement du renseignement et action contre les circuits financiers clandestins (France)
TRNC	Turkish Republic of Northern Cyprus
TUAC	Trade Union Advisory Committee (OECD)
U4	Anti-Corruption Resource Centre (Norway)
UKHL	UK House of Lords
UN	United Nations
UNCAC	UN Convention Against Corruption
UNESCO	UN Educational, Scientific and Cultural Organization
UNICORN	Global Unions Anti-Corruption Network
UNODC	UN Office on Drugs and Crime
UN ODCCP	UN Office for Drug Control and Crime Prevention
US\$	US Dollars
USSG	US Sentencing Guidelines
VDP	Voluntary Disclosure Program
WCL	World Confederation of Labour
WEF	World Economic Forum
WGB	Working Group on Bribery (OECD)
WTO	World Trade Organization

Country abbreviations¹

AR	Argentina
AT	Austria
AU	Australia
BE	Belgium
BG	Bulgaria
BR	Brazil
CA	Canada
CH	Switzerland
CL	Chile
CO	Colombia
CZ	Czech Republic
DE	Germany
DK	Denmark
EE	Estonia
ES	Spain
FI	Finland
FR	France

¹ Based on the list of the International Organization for Standardization (ISO).

ABBREVIATIONS

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GR	Greece
HU	Hungary
IE	Ireland
IL	Israel
IS	Iceland
IT	Italy
JP	Japan
KR	Korea, Republic of
LU	Luxembourg
MX	Mexico
NL	Netherlands
NO	Norway
NZ	New Zealand
PL	Poland
PT	Portugal
RU	Russian Federation
SE	Sweden
SI	Slovenia
SK	Slovakia
TR	Turkey
UK	United Kingdom
US	United States
ZA	South Africa