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GLOBAL ANTI-BRIBERY ENFORCEMENT: EU AND UK REACTIONS TO THE US FCPA SUSPENSION

Nadiia Zhukova,

*Attorney at Law, International Regulatory Compliance Specialist
(Kharkiv, Ukraine)*

ORCID ID: 0009-0007-8520-6989

ac.zhukova@gmail.com

Abstract. This article examines the global implications of the U.S. Foreign Corrupt Practices Act (FCPA) enforcement suspension. On February 10, 2025, the U.S. President issued an executive order which introduces a 180-day pause on FCPA investigations and enforcement for a policy review.

As one of the most influential anti-corruption laws globally, the FCPA has shaped compliance standards and corporate liability for bribery across various jurisdictions and continues to influence enforcement practices internationally. Its suspension has significant implications for worldwide anti-corruption efforts, prompting the EU and UK to reassess and adjust their regulatory frameworks.

The study employs dialectical and comparative legal approaches, as well as systemic-structural analysis.

The results indicate the need for adapting regulatory strategies in the EU and the UK due to changes in regulation. The conclusions highlight potential shifts in anti-corruption policies and emphasize the necessity of further research to assess the long-term impacts on global legal systems.

Key words: corruption, legislation, liability, regulatory changes, compliance standards, transnational cooperation, legal system impact.

Introduction. Corruption remains one of the most significant challenges in today's interconnected world. One of the most influential legal instruments in addressing this issue is the U.S. Foreign Corrupt Practices Act (FCPA), which prohibits bribery by U.S. companies, U.S. citizens, as well as foreign individuals and companies under U.S. jurisdiction, when interacting with foreign government officials. For decades, the FCPA has been a cornerstone of global anti-corruption enforcement, imposing strict penalties, including multi-billion-dollar fines and criminal liability for companies and individuals found guilty of violating its provisions. The law has significantly shaped the international anti-corruption landscape, influencing legal and regulatory standards in numerous countries.

However, on February 10, 2025, the U.S. President signed an executive order titled «Pausing Foreign Corrupt Practices Act Enforcement to Further American Economic and National Security» (U.S. President Trump, 2025), which suspends FCPA investigations and enforcement for a 180-day period to review the policy. This decision has raised widespread concern, particularly due to the significant impact that the FCPA has had in setting global standards for anti-corruption efforts.

The suspension of FCPA enforcement has sparked discussions about potential changes in U.S. anti-corruption policy, including the possibility of shifting to a more lenient approach. Such a shift could have profound implications for global regulatory frameworks, as the FCPA has heavily influenced anti-corruption measures in regions such as the European Union (EU) and the United Kingdom (UK). These jurisdictions now face challenges in adapting their legal systems to the evolving international landscape.

While existing research focuses on the influence of the FCPA on national legal systems, the impact of its suspension and potential changes in U.S. enforcement practices remain underexplored. This gap in research highlights the need for further analysis of how the EU and the UK will respond to shifts in U.S. policy and what adjustments may be needed in their own anti-corruption frameworks.

The purpose of the article is to analyze the reactions of the EU and the UK to the suspension of FCPA enforcement and assess the potential implications for their legal systems, compliance structures, and international anti-corruption cooperation. The research utilizes a range of specialized legal methods, forming the methodological basis for this analysis.

Research materials and methods. The methodology of this research is based on several key legal methods that enable a systematic study and analysis of issues related to the suspension of FCPA enforcement and its implications for global anti-corruption efforts.

The dialectical method helps identify contradictions and changes in anti-corruption strategies arising from the suspension of the FCPA. This method allows for viewing shifts in the legal systems of the U.S., EU, and the UK as a dynamic process involving the interaction of various political, economic, and legal factors.

The comparative legal method is applied to compare anti-corruption norms across different jurisdictions. This method enables the identification of differences in legal approaches and assesses how the suspension of FCPA enforcement influences legislative changes and practices in the EU and the UK, within the broader context of global anti-corruption efforts.

Systemic-structural analysis is employed to examine how legal and institutional frameworks may adapt in response to the changes brought about by the FCPA suspension. This method helps identify mechanisms that the EU and the UK can use to reform their anti-corruption strategies in light of changes in U.S. policy.

Therefore, the application of these methods provides a deeper understanding of the potential effects of the suspension of FCPA enforcement on international anti-corruption strategies. It also enables an assessment of how legal systems could be adapted in response to these changes. This approach facilitates a thorough evaluation of the suspension's consequences and the possible shifts in global anti-corruption practices.

The research materials used in this study include essential primary legal documents: the Foreign Corrupt Practices Act (FCPA), and the Bribery Act 2010 (United Kingdom), both of which significantly influence the development of international anti-corruption standards. EU anti-corruption legislation, including relevant directives and regulations, is also considered for its role in shaping regional compliance frameworks. Secondary sources, such as legal analyses, scholarly articles, statistics, and data from Stanford Law School, along with reviews, are employed to provide a well-rounded understanding of the topic and support the analysis of global anti-corruption practices.

The tasks of this research are as follows:

(A) To evaluate the impact of the suspension of FCPA enforcement on global anti-corruption strategies and the legal consequences for international compliance standards.

(B) To analyze the reactions of the European Union and the United Kingdom to the suspension, with particular focus on the steps and measures already taken by these jurisdictions in response to changes in U.S. anti-corruption policy.

(C) To assess the potential long-term consequences of the suspension of FCPA enforcement for global anti-corruption efforts, including shifts in international legal systems.

(D) To identify potential reforms or adaptations within the legal systems of the EU and the UK to address changes brought about by the suspension of FCPA, ensuring the continued effectiveness of their anti-corruption strategies.

Thus, the successful achievement of these tasks will offer a comprehensive understanding of the broader implications of the FCPA suspension and contribute to the development of more adaptive and resilient legal frameworks in the fight against global corruption.

Results of the study and discussion. «Foreign bribery is a scourge that must be eradicated. It undermines the rule of law, empowers authoritarian rulers, distorts free and fair markets, disadvantages honest and ethical companies, and threatens national security and sustainable develop-

ment» (Criminal Division of the U.S. Department of Justice and the Enforcement Division of the U.S. Securities and Exchange Commission, 2020: FOREWORD).

This foundational principle has long guided global anti-corruption enforcement, with the U.S. Foreign Corrupt Practices Act (FCPA) playing a central role in combating international bribery. However, the recent suspension of FCPA enforcement by the U.S. President represents a significant shift in this paradigm, raising concerns about the potential weakening of global efforts to combat corruption.

With the Department of Justice (DOJ) halting new prosecutions and reviewing existing cases, the landscape of anti-corruption enforcement is at a crossroads. The question now arises: will this pause create an enforcement gap, or will other jurisdictions – most notably the United Kingdom and the European Union – step in to uphold anti-corruption standards?

It is important to emphasize the depth and scope of the Foreign Corrupt Practices Act (FCPA), which encompasses both anti-bribery and accounting provisions. «The anti-bribery provisions prohibit U.S. persons and businesses (domestic concerns), U.S. and foreign public companies listed on stock exchanges in the United States or that are required to file periodic reports with the Securities and Exchange Commission (issuers), and certain foreign persons and businesses acting while in the territory of the United States (territorial jurisdiction) from making corrupt payments to foreign officials to obtain or retain business. The accounting provisions require issuers to make and keep accurate books and records and to devise and maintain an adequate system of internal accounting controls. The accounting provisions also prohibit individuals and businesses from knowingly falsifying books and records or knowingly circumventing or failing to implement a system of internal controls» (Criminal Division of the U.S. Department of Justice and the Enforcement Division of the U.S. Securities and Exchange Commission, 2020: 1).

According to the statistics published by Stanford Law School in the section «Monetary Sanctions Paid to Foreign Governments in FCPA-related Enforcement Actions» (Stanford Law School – Key statistics, 2024), the total amount of fines imposed for FCPA violations from the inception of the law in 1977 to 2024 was USD 14,177,875,356. These sanctions are associated with various enforcement actions, including payments made as part of investigations covering multiple countries.

The geographic distribution of violations, presented by Stanford Law School (2024) in the section «FCPA-related Enforcement Actions by Geography» (Stanford Law School – By geography, 2024) shows that a significant portion of investigations and proven FCPA violations is linked to European Union countries. For example, 4 violations were recorded in Italy, 8 in Poland, and 9 in Greece, 4 in Romania, 3 in Hungary, etc.

In the previously mentioned Executive Order of February 10, 2025, it is particularly emphasized that the national security of the United States depends significantly on the ability of the country and its companies to obtain strategic business advantages, whether in the field of critical minerals, deep-water ports, or other key infrastructure and assets.

At the same time, it is pointed out that «overexpansive and unpredictable FCPA enforcement against American citizens and businesses – by our own Government – for routine business practices in other nations not only wastes limited prosecutorial resources that could be dedicated to preserving American freedoms, but actively harms American economic competitiveness and, therefore, national security» (U.S. President Trump, 2025).

Thus, the fundamental purpose of this order, and indeed the current enforcement approach, is to remove excessive barriers to U.S. trade abroad. And, most likely, strict anti-corruption measures are considered by the current US administration as such “excessive barriers”.

This approach to anti-corruption enforcement is characterized by two key features: first, it suggests that the focus of the FCPA may shift from U.S. companies and their potential liability for violating the law to foreign companies; and second, the executive order marks a substantial shift in U.S. priorities

regarding anti-corruption efforts, which, due to the global reach of FCPA enforcement, will inevitably affect the dynamics of corruption. This will require new approaches and an updated framework for international cooperation to effectively combat corrupt practices.

For comparison, we can refer to the Biden administration's anti-corruption strategy, released in December 2021. This document presented the first-ever US Anti-Corruption Strategy, which outlined a series of actions to be taken between 2023 and 2025. It provided a broad approach for the government, non-governmental organizations, and the private sector to fight global corruption.

As part of this strategy, the U.S. Department of State developed an Implementation Plan, which outlined specific actions aimed at achieving the five key pillars of the strategy: «1. Modernizing, Coordinating, and Resourcing Efforts to Fight Corruption 2. Curbing Illicit Finance 3. Holding Corrupt Actors Accountable 4. Preserving and Strengthening the Multilateral Anti-Corruption Architecture 5. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Goals» (U.S. Department of State, 2023: 2)

These directions reflected the previous administration's broader vision of creating a coordinated global approach to fighting corruption and emphasized the U.S. government's commitment to use diplomatic, financial, and legal tools to advance this process.

In contrast, the current administration's strategy has significantly shifted these priorities. The executive order, which aims to limit the application of the FCPA to U.S. companies and shift the focus to foreign companies, has become a central element of the new anti-corruption framework. As a result, a more robust and comprehensive approach to global anti-corruption efforts has been replaced by an almost direct statement that these efforts were unnecessary obstacles to the development of American business. This radical change in policy clearly affects how the FCPA is applied on the global stage and raises critical questions about finding an equally effective tool to combat corruption in light of such reduction in enforcement.

Thus, considering the mentioned facts and expectations of fundamental changes, it is important to pay attention to the legislative approaches applied in different European countries to prevent corruption offenses. In the context of globalization, where corruption crimes can have an international dimension, the legislation of several countries aims to combat this phenomenon not only within their borders but also beyond them. For instance, we can examine the anti-corruption legislation of the United Kingdom, France, Germany, and Greece – countries whose laws include provisions aimed at fighting corruption both domestically and internationally, making the fight against corruption more comprehensive and global.

The UK Bribery Act applies to both individuals and organizations worldwide if their actions involve bribery or failure to prevent bribery in connection with the UK. The main provisions are:

(A) *Offense of Giving, Receiving, or Bribing Foreign Public Officials*: this applies to acts of bribery within the UK (England, Wales, Scotland, Northern Ireland).

It also applies to offenses committed outside the UK that would be considered an offense within the UK, provided there is a connection to the UK. «A person has a close connection with the United Kingdom if, and only if, the person was one of the following at the time the acts or omissions concerned were done or made –

- (a) a British citizen,
- (b) a British overseas territories citizen,
- (c) a British National (Overseas),
- (d) a British Overseas citizen,
- (e) a person who under the British Nationality Act 1981 was a British subject,
- (f) a British protected person within the meaning of that Act,
- (g) an individual ordinarily resident in the United Kingdom,
- (h) a body incorporated under the law of any part of the United Kingdom,
- (i) a Scottish partnership» (UK Bribery Act, 2010).

(B) Offense of Failing to Prevent Bribery by a Commercial Organization: the law applies to commercial organizations incorporated in the UK or organizations incorporated elsewhere but conducting business in the UK or part of their business in the UK. These organizations must take adequate steps to prevent bribery, or they will face penalties under the law.

Hence, the UK, with one of the most stringent anti-corruption regimes in the world, continues to lead the way in implementing anti-bribery standards. The extraterritorial reach of the UK Bribery Act 2010 and its strict requirements for the prevention of corruption offenses underscore the country's commitment to strengthening corporate accountability. The introduction of the new offense of «failure to prevent fraud» (UK Serious Fraud Office, 2024: 11), which will come into force on September 1, 2025, further underscores the increased regulation and the UK's determination to strengthen international anti-corruption mechanisms, despite the weakening of enforcement in the United States.

French anti-corruption laws apply to individuals or entities involved in corruption related to France or French nationals, regardless of where the offense occurs, e.g.:

«Any of the acts of corruption constituting the criminal offense of which you are accused have been committed in France (Article 113-2 of the French criminal code); The victim is a French national (Article 113-7 of the French criminal code);

The acts were committed in a foreign jurisdiction and punished as such, and you are a French national (Article 113-6 of the French criminal code); or

Corruption has taken place relating to a foreign or an international public official, and you are a French resident or carry out all or part of your economic activity in France (Article 435-6-2 of the French criminal code)» (Reed Smith Client Alerts: 2021).

These provisions ensure that French law covers corruption both within France and internationally, as long as there is a link to French nationals or interests.

In Germany, anti-corruption laws apply to individuals, not organizations. However, organizations can face fines under the Regulatory Offenses Act for actions taken by their representatives. The main provisions are:

Criminal Liability for Individuals: in Germany, criminal liability for corruption applies only to natural persons (individuals). This means only individuals can be held criminally responsible for offering or receiving bribes.

Fines for Organizations: legal entities can be fined for offenses committed by their representatives. Fines can reach up to €10 million.

Under Greek criminal law, only natural persons can be criminally liable. «Greek criminal statutes are enforced for all offenses committed on Greek territory, even if committed by foreign nationals. Relevant offenses for which a Greek or foreign national may be held liable under the Greek criminal code (GCC)» ((Reed Smith Client Alerts: 2021)). The main provisions are:

(A) Passive Bribery of Public Officials (Article 235 of the Greek Criminal Code): This applies to public officials who accept bribes in exchange for improper actions or omissions related to their duties. Penalties can include up to five years in prison, with harsher penalties for officials who violate their duties.

(B) Active Bribery of Public Officials (Article 236 of the Greek Criminal Code): This applies to offering or promising bribes to public officials to induce them to act improperly. Penalties can include imprisonment or fines, with aggravated penalties for public officials violating their duties.

(C) Bribery in the Private Sector (Article 396 of the Greek Criminal Code): This applies to offering or receiving bribes to influence actions in violation of professional duties in the private sector. Penalties include imprisonment for up to one year and a fine.

(D) Money Laundering: Criminal sanctions for money laundering include imprisonment for one to six years and fines. If the offense is related to bribery, the penalties are more severe, with imprisonment ranging from five to fifteen years and fines up to €1.5 million.

Thus, in each of these countries, there are various forms of liability for corruption, covering both individuals and organizations, with the specific regulations tailored to each jurisdiction's legal framework. The overall goal is to combat corruption both domestically and internationally.

In addition to these national anti-corruption laws, there is also a general legal framework governing anti-corruption activities in the European Union (EU). These measures are aimed at ensuring harmonization of anti-corruption policies of the Member States and strengthening law enforcement mechanisms.

On May 3, 2023, the European Commission presented a new proposal to fight corruption through criminal law. Bribery remained at the center of the new legislation, but many other forms of corruption were also considered as threats to citizens and society. Among other measures, the proposed legislative framework was as follows:

«Step up corruption prevention by raising awareness of the negative impact of corruption on citizens and our societies to address corruption risks before they emerge or deepen and stimulate a culture of integrity.

Extend the definitions of criminal corruption offences beyond the more classic bribery offences, including for example also misappropriation, trading in influence, abuse of functions, as well as obstruction of justice and illicit enrichment related to corruption offences.

Introduce minimum criminal penalties and sanctions for different offences to ensure a level playing field in all Member States

Extend the statute of limitation to prosecute corruption in courts

Ensure that law enforcement and prosecutors have appropriate investigative tools and resources at hand to fight corruption

With this proposal, the EU modernises the current, fragmented and pre-Lisbon EU level framework on corruption and implements international obligations under the UN Convention Against Corruption (UNCAC).

The new EU anti-corruption measures includes:

Communication on the fight against corruption, Proposal for a Directive of the European Parliament and the Council on combatting corruption by criminal law, and a new EU sanction regime for corruption.

Until formal adoption of the new proposed Directive by the co-legislators, the main anti-corruption legislation remains: The 1997 Convention on fighting corruption involving officials of the EU or officials of EU countries; The 2003 Council Framework Decision on combating corruption in the private sector, which criminalises both active and passive bribery; The 2008 Council Decision 2008/852/JHA on a contact-point network against corruption.

Both, the 1997 Convention and 2003 Council Framework decision will be replaced by the new Directive, for those EU Member States bound by the new Directive» (European Commission, 2023).

In March 2025, the United Kingdom, France, and Switzerland announced the creation of a new anti-corruption alliance aimed at addressing international bribery and corruption. This collaboration marks a significant step in strengthening the cooperation between the three countries, all of which have robust anti-corruption legal frameworks enabling them to prosecute crimes committed overseas if there is a link to the prosecuting country. A key point of this initiative is the establishment of a taskforce to strengthen collaboration that will enhance existing ties, improve collaboration on investigations, and facilitate the exchange of expertise and insights. It is important to refer to the statements of the anti-corruption governing authorities of these countries published in the press release «Great Britain, France and Switzerland Announce New Anti-Corruption Alliance»

Nick Ephgrave, Director of the Serious Fraud Office (SFO – UK), stated: «The commitment we have made today reaffirms our individual and collective resolve to tackle the pernicious threat of international bribery and corruption, wherever it occurs. We will make use of every power and partnership available to confront this criminality. This taskforce is an important step forward in our approach».

Jean-François Bohnert, Head of the Parquet National Financier (PNF – France), added: «I am delighted that ten years of operational cooperation between PNF, SFO, and OAG have evolved into the creation of this prosecutorial taskforce. This will definitely strengthen our current cooperation in order to fight more efficiently against bribery and corruption in individual cases».

Stefan Blättler, Attorney General of the Swiss Confederation, commented: «Within the framework of this cooperation, we will be able to help ensure that fraud and crime can be better combated in the future. This taskforce is of great importance for Switzerland».

Solicitor General Lucy Rigby KC MP (UK) said: «I welcome the SFO's commitment to working even more closely with their French and Swiss partners, including by setting up this new taskforce to tackle international bribery and corruption. Through strong international partnerships, we will be able to robustly tackle cross-border economic crime and protect our future prosperity» (UK Serious Fraud Office, Press release, 2025).

As part of the cooperation framework, the European authorities plan to establish a leaders' group to exchange strategies and ideas, as well as a Working Group to develop proposals for conducting joint activities. The authorities have committed to strengthening the basis for future operational cooperation and sharing of best practices. In addition, the Statement indicates that the group will be committed to inviting other similar organizations, which could lead to an increase in the number of countries involved in joint investigations and enhanced anti-corruption efforts. It could also lead to increased use of joint investigation teams (JITs), which have become highly developed in Europe in recent years. Such teams allow law enforcement agencies from different countries to share information and evidence in real time, minimizing operational delays.

«The creation of the taskforce should serve as a reminder that anti-corruption enforcement remains a top priority internationally, despite the U.S.'s pause of the FCPA. Additionally, given the jurisdictional reach of the three European countries' anti-corruption laws, the taskforce is an example of why it is essential for companies to maintain their anti-corruption compliance efforts» (Sidley Austin LLP, Holmes, 2025).

Conclusions. The study highlights the deep impact of the U.S. government's suspension of the Foreign Corrupt Practices Act (FCPA) on global anti-corruption efforts and the challenges companies face as they navigate the changing regulatory environment. The suspension has caused significant uncertainty, especially for companies operating in jurisdictions where compliance with FCPA regulations is critical.

Key conclusions from the article are as follows:

(A) Impact on Global Anti-Corruption Standards – the suspension of the FCPA disrupted the consistency of global anti-corruption practices. As one of the most influential anti-corruption laws, the FCPA has had a fundamental impact on international compliance standards. Its temporary suspension and accompanying statements about its ineffectiveness and redundancy raise concerns about the future stability of U.S. anti-corruption policy and prompt a reassessment of global anti-corruption strategies.

Despite the suspension, the law has not been repealed, and given the long timeframes for potential reviews and the possibility of further tightening of measures in the case of political changes, anti-bribery compliance programs should continue to remain fully effective.

(B) Strengthening Regional Cooperation and Creating New Alliances – the establishment of the anti-corruption alliance between the United Kingdom, France, and Switzerland represents a significant response to the uncertainties created by the FCPA suspension. This collaboration is an important step towards greater regional cooperation in addressing international bribery and corruption. Strengthening ties and improving information exchange between these countries will help close the regulatory gaps created by the suspension of the FCPA. This initiative not only strengthens the anti-corruption systems of these countries but also serves as an example for other nations in the global fight against corruption.

(C) Long-Term Implications for the Global Fight Against Corruption – the suspension of the FCPA could affect global anti-corruption strategies in the long term. It may lead to discrepancies in the application of compliance standards across jurisdictions, complicating compliance for multinational companies, and potentially contributing to a sharp increase in corruption, especially among American companies globally. However, this challenge also presents an opportunity for regional legal systems, such as those of the EU and the UK, to strengthen their anti-corruption efforts, filling the gap left by the FCPA suspension and continuing global anti-corruption initiatives.

(D) Necessary Reforms in the Legal Systems of the EU and the UK The UK and the EU are likely to continue implementing reforms aimed at improving anti-corruption measures and strengthening cooperation with other jurisdictions. These efforts will focus on addressing gaps arising from changes in U.S. anti-corruption policy and reinforcing global anti-corruption standards.

Further research should focus on practical solutions to help businesses navigate regulatory uncertainty, including:

- Assessing the Impact of Regional Anti-Corruption Alliances on Global Trade: The creation of new anti-corruption alliances, such as the one between the UK, France, and Switzerland, should be studied to understand their role in filling the gap left by the FCPA suspension. Research may focus on how these alliances improve compliance and facilitate more effective enforcement, mitigating risks associated with regulatory instability.

- Mitigating Risks from Regulatory Inconsistencies: Companies will need to adapt their risk management strategies to account for the increased uncertainty in global compliance. Research may focus on how companies can control anti-corruption compliance in their operations and adjust their legal strategies to minimize the impact of regulatory changes.

By focusing on these areas, companies will be better positioned to navigate complex and uncertain regulatory environments and maintain high levels of compliance with international anti-corruption standards.

In conclusion, while the suspension of the FCPA presents certain challenges, it also offers opportunities for the EU, the UK, and other global partners to strengthen their anti-corruption systems. Through continued collaboration, innovation, and reform, the global community can ensure that the fight against corruption remains robust and effective amid changing regulatory landscapes.

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