

# Webcast: FCPA and Anti-Corruption Enforcement Trends in Global Markets

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2024 saw significant anti-corruption developments around the globe, as governments continued to ramp up domestic and extraterritorial anti-corruption enforcement against a backdrop of continued major political, economic and military developments around the world. Meanwhile, in the early days of the new Trump administration, the Department of Justice has outlined its new criminal enforcement priorities, and it remains uncertain how this will impact ongoing FCPA cases or the pipeline of future enforcement actions at the Department, and whether other enforcement agencies in the U.S. or abroad will follow suit. This webcast explores the approach taken by regulators in the global arena in addressing these challenges and examine the trends seen in FCPA and global anti-corruption political, policy, and enforcement actions. Anti-corruption enforcement in China has led to significant enforcement actions in state-run financial and energy sector companies, while the government has signaled its intent to focus on bribe payors with new anti-corruption amendments to its Criminal Law. China's legislative bodies have also continued their focus on data privacy, national security, and international judicial cooperation in ways that impact efforts to conduct internal investigations or cooperate with outside enforcement agencies. The EU continues its struggle to harmonize its anti-corruption enforcement initiatives across 27 member states and is further challenged by the impact of the Russia-Ukraine war on businesses operating in the region. 2024 also saw a number of significant developments in Africa, including FCPA enforcement actions involving six African countries in sectors such as consulting, software and aviation. The past year also saw Africa-related corruption prosecutions in the UK, France and Germany, as well as domestic enforcement and anti-corruption actions taken by the African Development Bank. Finally, in recent years Latin American enforcement authorities have cooperated closely with U.S. authorities on anti-corruption enforcement matters. The challenge for 2025 and beyond will be whether the Trump Administration's shift in anti-corruption enforcement and U.S. foreign policy in the region—underscored by recent disputes with Mexico and Colombia over tariffs, and Panama over the Panama Canal—will lead to a global pullback in anti-corruption political and enforcement efforts and reduce international cooperation on anti-corruption investigations.

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**Benno Schwarz** is the partner in charge of the Munich office and co-chair of the firm's Anti-Corruption & FCPA Practice Group. He focuses on white collar defense and compliance investigations in a wide array of criminal regulatory matters. For more than 30 years, he has handled sensitive cases and investigations concerning all kinds of compliance issues, especially in an international context. Benno assists his clients in the prevention and avoidance of corruption, fraud and money laundering and in navigating economic sanctions in the corporate sector. **Oliver D. Welch** is a resident partner in the Hong Kong office and a partner in the Singapore office. A Korean speaker, Oliver has extensive experience representing multi-national corporations throughout the Asia region on a wide variety of compliance and anti-corruption issues. He focuses on internal and regulatory investigations, including those involving the Foreign Corrupt Practices Act and regularly counsels clients on their anti-corruption compliance programs and controls, including the drafting of policies, procedures, and training materials designed to foster compliance with global anti-corruption laws. Oliver also frequently advises on anti-corruption due diligence in connection with corporate acquisitions, private equity investments, and other business transactions. **Ning Ning** is an of counsel in Hong Kong and member of the firm's White Collar Defense and Investigations Practice. Ning's practice focuses on advising clients on government and internal investigations compliance counseling, and compliance due diligence matters across the Asia-Pacific region. She has represented clients before the U.S. Department of Justice and the U.S. Securities and Exchange Commission involving potential violations of the U.S. Foreign Corrupt Practices Act, securities laws, and other white collar defense matters. Ning regularly advises clients on internal investigations relating to allegations of corruption, fraud, and accounting irregularities. **Pedro G. Soto** is of counsel in the Washington, D.C. office. He is a member of the White Collar Defense and Investigations group, and his practice focuses primarily on anti-corruption and fraud matters. Pedro has nearly 15 years of experience representing corporations and individuals under investigation by government authorities. He has also conducted compliance due diligence for over 100 transactions around the world. Pedro has particularly deep experience in Latin America, where he has worked on matters in more than 15 different countries. He also represents foreign governments and private claimants in significant litigation and arbitration matters. **Karthik Ashwin Thiagarajan** is an of counsel in the Singapore office. He focuses on mergers and acquisitions, joint ventures and corporate restructuring matters in India and Southeast Asia. Karthik has assisted companies and investors across a variety of industries, including the information technology, fin-tech, telecommunication, logistics and consumer goods sectors. He has also advised clients on several cross-border restructuring matters in Southeast Asia. In addition to his mergers and acquisitions experience, he also advises clients on internal investigations and anti-corruption reviews in the region. © 2025 Gibson, Dunn & Crutcher LLP. All rights reserved. For contact and other information, please visit us at [www.gibsondunn.com](https://www.gibsondunn.com). Attorney Advertising: These materials were prepared for general informational purposes only based on information available at the time of publication and are not intended as, do not constitute, and should not be relied upon as,

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