

### Corruption Enforcement Tracker

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
<b>2025</b>						
United Insurance Brokers Limited (UIBL)	UK (SFO)	2013 – 2016	UK, USA, Ecuador	<ul style="list-style-type: none"> <li>UIBL is charged with failing to prevent associates from bribing state officials in Ecuador between October 2013 and March 2016.</li> <li>UIBL's US-based intermediaries for Ecuador are alleged to have paid bribes in return for the awarding of re-insurance contracts worth US\$38 million.</li> <li>UIBL offered re-insurance services for losses caused by making significant and unexpected payouts for insurance policies, sold to state insurers offering coverage to parts of the Ecuadorian public sector, including the state water and electricity companies.</li> <li>UIBL received a US\$6.2 million commission to provide these services. It is alleged that US\$3 million was paid to intermediaries.</li> </ul>	<ul style="list-style-type: none"> <li>7 May 2025: representatives of UBIL appeared before Westminster Magistrates' Court.</li> <li>If the case proceeds to a contested trial, it will be the first SFO "failure to prevent bribery" case heard by a jury: the Skansesn Interiors trial of 2018 having been prosecuted by the NCA and CPS.</li> </ul>	
Blu-3 and former associates of Mace Group	UK (SFO, NCA)	[•]	UK, Monaco, Netherlands	<ul style="list-style-type: none"> <li>Blu-3 was founded in 2004; the business manages large construction project and has previously helped Mace Group (a UK-headquartered company) on such projects. In 2014, it entered the datacentre market in the Netherlands.</li> </ul>	<ul style="list-style-type: none"> <li>On 30 April 2025, the SFO searched five properties and made three arrests in relation to the multi-million pound international bribery investigation.</li> </ul>	

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				<ul style="list-style-type: none"> <li>Individuals at Blue-3 are suspected of paying more than £3 million in bribes to former associates of the Mace Group in relation to the construction of a data centre in the Netherlands for Microsoft. Microsoft is not under investigation.</li> </ul>	<ul style="list-style-type: none"> <li>The properties searched include four homes and one commercial property across London, Kent, Surrey and Somerset.</li> <li>The investigation is ongoing.</li> </ul>	
<b>2024</b>						
Timeshare Legals Ltd. and others	UK (SFO, NCA)	2018 – 2024	UK	<ul style="list-style-type: none"> <li>In December 2024, the SFO announced an investigation into numerous companies (including Timeshare Legals Ltd.) in relation to a complex timeshare services scheme it believed to have been operated by an organised crime network.</li> <li>It is suspected that between January 2018 and September 2024, the companies cold called members of the public offering exit and/or compensation from timeshare or holiday clubs for an upfront fee. No services are understood to have ever been provided in most cases.</li> <li>People who purchased these services are believed to have been contacted again and pressured into paying another upfront fee to recover their money on the basis that it was fraudulent.</li> </ul>	<ul style="list-style-type: none"> <li>16 April 2025: one further individual was arrested, questioned and released pending further investigation.</li> <li>August / September 2024: the SFO made 3 arrests on suspicion of fraud offences.</li> <li>The full list of suspected companies can be found here - <a href="#">Timeshare Legals Ltd. and others - GOV.UK</a></li> <li>The investigation is ongoing.</li> </ul>	
Carlauren Group	UK (SFO)	c. 2016 – 2019	UK	<ul style="list-style-type: none"> <li>Over four years, Carlauren purchased 23 properties across the UK. It offered investors an annual 10% return on investment from</li> </ul>	<ul style="list-style-type: none"> <li>On 12 March 2024, the SFO raided two sites and made three arrests in St Leonard's,</li> </ul>	

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				<p>the renovation of these properties into high-end care homes. Only nine of the properties were operational and some continued to be run as hotels, instead of homes. Carlauren also purchased a number of luxury vehicles purportedly for the company.</p> <ul style="list-style-type: none"> <li>Carlauren collapsed into administration in November 2019. Approximately 600 people and companies invested in the scheme before then.</li> </ul>	<p>Hampshire, Aylesbury and Buckinghamshire.</p> <ul style="list-style-type: none"> <li>On 3 September 2024, SFO officers with support from Dorset Police executed a search warrant at a home in Dorset.</li> </ul>	
Signature Group	UK (SFO, NCA)	2013 - 2020	UK	<ul style="list-style-type: none"> <li>Signature Group, an international property investment scheme, operated for more than seven years. Investors were able to invest in redeveloping landmarks in the UK by loaning money to the company or by purchasing space within the Signature Group's properties (e.g., a hotel room, apartment, office). Promised returns ranged from 8% to 15%.</li> <li>In 2020, Signature Group fell into administration with losses of up to £140 million.</li> </ul>	<ul style="list-style-type: none"> <li>The SFO raided three residences and made four arrests in Merseyside and Greater Manchester. All four individuals have been released pending further investigation.</li> </ul>	
Thales Group	UK (SFO) & France (PNF)	[•]	UK, France	<ul style="list-style-type: none"> <li>Thales is a multinational aerospace and defence technology company. The investigation relates to four Thales entities in France and the UK regarding the performance of a contract in Asia.</li> </ul>	<ul style="list-style-type: none"> <li>This investigation is ongoing.</li> </ul>	

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				<ul style="list-style-type: none"> <li>In November 2024, the SFO announced a joint investigation with the French Parquet National Financier (“PNF”) into suspected bribery and corruption, including possible charges of bribery of a foreign public official, influence trafficking, the handling of stolen goods and money laundering.</li> </ul>		
Ultra Electronics Holdings Limited	UK (SFO)	[•]	Algeria, Oman (further, any country)	<ul style="list-style-type: none"> <li>In 2018, the SFO commenced its investigation into Ultra’s business activities in Algeria. This investigation remains ongoing.</li> <li>As of 12 June 2023, the scope of the investigation was broadened in respect of additional allegations of corruption in Oman.</li> <li>On 1 October 2024, the SFO further extended its criminal investigation into Ultra Electronics Holdings Limited (formerly plc), into any suspected offences of bribery, corruption, or related offending (including money laundering) by Ultra, its subsidiaries, employees, and agents in any country, as long as the offences are triable in the United Kingdom.</li> </ul>	<ul style="list-style-type: none"> <li>This investigation is ongoing.</li> </ul>	
London Mining Plc	UK (SFO)	2009 - 2014	UK, Sierra Leone	<ul style="list-style-type: none"> <li>The SFO alleges that Graeme Hossie (former CEO), Rachel Rhodes (former CFO) and Ariel Armon (international business consultant) (the “<b>Defendants</b>”) engaged in bribery and corruption to secure favourable treatment for London Mining in Sierra Leone.</li> </ul>	<ul style="list-style-type: none"> <li>This investigation is ongoing.</li> </ul>	<ul style="list-style-type: none"> <li>14 July 2023: the Defendants appeared at Southwark Crown Court for a Plea and Trial Preparation Hearing,. The trial was initially set for January 2025.</li> </ul>

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						<ul style="list-style-type: none"> <li>17 October 2014: the Defendants attended a Further Case Management Hearing. Due to the Court's availability, the January trial date was adjourned.</li> <li>31 January 2025: scheduled Further Case Management Hearing.</li> <li>7 April 2026: provisional trial date.</li> </ul>
Arena Television Limited and linked entities	UK (SFO, NCA)	2021 - 2022	UK	<ul style="list-style-type: none"> <li>In 2021, Arena Television, a sports broadcaster, collapsed.</li> <li>The SFO inquiry relates to alleged fraud involving up to approximately £282 million in loans, secured by 55 asset finance lenders, against leased broadcasting equipment that was discovered to not exist.</li> </ul>	<ul style="list-style-type: none"> <li>ON 23 February 2022, the SFO and NCA searched three sites; two individuals were arrested and questioned.</li> <li>On 16 December 2024 a man was arrested with assistance from the Metropolitan Police.</li> </ul>	<ul style="list-style-type: none"> <li>In mid-July 2024, the liquidators of Arena Television initiated a Part 7 civil claim against Lloyds Bank and Bank of Scotland.</li> <li>In June 2023, in France, Richard Yeowart and Robert Hopkinson (former co-directors) were put on trial for money laundering and using false documents.</li> </ul>
<b>2023</b>						
AOG Technics Ltd	UK (SFO)	2015 - [●]	UK	<ul style="list-style-type: none"> <li>Since 2015, AOG Technics supplied aircraft engine parts for passenger aircraft around the world.</li> <li>In 2023 the SFO began an investigation regarding "very serious allegations of fraud".</li> <li>On 4 August 2023, the UK Civil Aviation Authority and European Aviation Safety Agency, followed by the United States</li> </ul>	<ul style="list-style-type: none"> <li>In the ongoing investigation, on 6 December 2023 the SFO conducted a dawn raid on a site in London and made one arrest.</li> </ul>	

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				Federal Aviation Administration on 21 September 2023, issued safety notes in respect of suspected unapproved parts distributed by AOG Technics.		
Entain plc	UK (HMRC, CPS)	2011 - 2017	UK, Turkey	<ul style="list-style-type: none"> <li>Entain, is an international sports betting and gambling company and the parent company of Ladbrokes and Coral.</li> <li>In 2019, HMRC commenced an investigation into Entain's legacy Turkish subsidiary. On 20 July 2020, HMRC began an investigation of offences under section 7 Bribery Act 2010 in relation to alleged failure to prevent bribery in the (now disposed) Turkish business in respect of activities of former third-party suppliers and employees.</li> </ul>	<ul style="list-style-type: none"> <li>Entain agreed to a £615 million payment as part of a DPA with the CPS. The DPA included various financial and non-financial terms (in addition to the standard DPA term which required Entain's full and good faith cooperation with relevant authorities).</li> <li>The financial terms of the four-year term DPA include: (i) a financial penalty of £465 million (reflecting Entain's revenue from the Turkish operations at the time); (ii) £120 million relating to the disgorgement of profits; (iii) £10 million in costs; (iv) a £20 million charitable donation as agreed with the CPS.</li> </ul>	<ul style="list-style-type: none"> <li>This is the second largest DPA secured in the UK, to date.</li> <li>This is the first DPA entered into by the CPS, prior to which, all DPAs had been entered into by the SFO.</li> </ul>
Axiom Ince Limited	UK (SFO)	[•] - 2023	UK	<ul style="list-style-type: none"> <li>Axiom Ince was a law firm which the SRA closed on 3 October 2023 after allegations that client funds had been misappropriated. The firm collapsed the following month – thousands of clients faced significant losses.</li> </ul>	<ul style="list-style-type: none"> <li>On 15 January 2025, the defendants appeared at Westminster Magistrates Court.</li> </ul>	

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				<ul style="list-style-type: none"> <li>On 20 December 2024, the SFO charged five individuals with fraud, forgery and the destruction of documents as well as the misappropriation of more than £60 million in client monies.</li> </ul>		
Safe Hands Plans Limited and SHP Capital Holdings Limited	UK (SFO)	[•]	UK	<ul style="list-style-type: none"> <li>In 2022, Safe Hands Plans Limited and SHP Capital Holdings Limited collapsed. The companies had previously operated a pre-paid funeral plan scheme that failed to secure FCA authorisation. Prior to the collapse, 46,000 plan holders who had made payments towards their funeral plans.</li> <li>The SFO launched its investigation on 11 October 2023 for suspected fraud perpetrated by the companies.</li> </ul>	<ul style="list-style-type: none"> <li>The investigation by the SFO into this matter is ongoing.</li> <li>In late September 2023, the SFO issued notices compelling UK banks and other witnesses to produce information. On 11 October 2023, the SFO issued further notices compelling stockbrokers and financial institutions to produce relevant information.</li> </ul>	
Patisserie Holdings plc	UK (SFO)	2015 - 2018	UK	<ul style="list-style-type: none"> <li>In 2018, Patisserie Valerie (the high street bakery chain) collapsed. The company reported “<i>significant, and potentially fraudulent, accounting irregularities</i>”. Patisserie Holdings plc, the parent company of Patisserie Valerie became subject to an SFO investigation in October 2018.</li> <li>On 13 September 2023, the SFO brought fraud charges against Christopher Marsh (former Finance Director), Louise Marsh (accountant), Pritesh Mistry (Financial Controller), and Nileshkumar Lad (financial consultant) relating to conspiracy to defraud</li> </ul>	<ul style="list-style-type: none"> <li>Marsh, Mistry and Lad have been charged with fraud by false representation and making and supplying articles for use in frauds. Additionally, Marsh faces a charge of making false statements as a company director.</li> <li>On 10 October 2023, all four defendants attended the first hearing at Westminster Magistrates Court.</li> </ul>	<ul style="list-style-type: none"> <li>Grant Thornton, auditor of Patisserie Holdings, was fined £2.3 million for audit-related failures.</li> </ul>

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				by inflating the cash in the company's balance sheet and annual reports.	<ul style="list-style-type: none"> <li>On 26 April 2024, all four defendants pleaded not guilty to all charges at Southwark Crown Court.</li> <li>The trial is listed for March 2026.</li> </ul>	
Harlequin Group	UK (SFO)	2010 - 2015	UK, St Vincent, Grenadines, St Lucia, Barbados	<ul style="list-style-type: none"> <li>On 17 February 2017, David Ames, chairman of the Harlequin Group of companies, was charged by the SFO with three counts of fraud by abuse of position.</li> <li>David Ames used a pyramid-like structure to sell shares in off-plan holiday homes at resorts in the Caribbean via a scheme that offered investors rental returns. The scheme attracted more than 8,000 investors, who went on to lose a total of £398 million.</li> </ul>	<ul style="list-style-type: none"> <li>The jury returned a unanimous guilty verdict on 3 August 2022. Subsequently, on 30 September 2022, Ames was sentenced to 12 years in prison and was disqualified from acting as a company director for the maximum term of 15 years.</li> <li>Mr. Ames was convicted of two counts of fraudulently abusing his position as Chairman of Harlequin Group and losing £226 million of investors' funds.</li> <li>Ames sought to appeal his sentence, and his application for permission to appeal was granted by the Court of Appeal on 20 June 2023. However, in December 2023, Ames was unsuccessful in appealing both his conviction and sentence.</li> </ul>	



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Ethical Forestry Limited	UK (SFO)	2008 - 2016	UK	<ul style="list-style-type: none"> <li>Ethical Forestry Limited, operated tree plantations in Costa Rica. The company collapsed in 2015.</li> <li>In March 2017, the SFO announced its investigation into the company; the investment schemes involved investments made in fast-growing hard wood saplings and offered a return once the grown trees were logged and sold.</li> </ul>	<ul style="list-style-type: none"> <li>On 14 June 2023, former directors Matthew Pickard, Stephen Greenaway, and Paul Laver were charged with two counts of conspiracy to commit fraud by false representation and one count of fraudulent trading.</li> <li>On 28 June 2023, the defendants appeared for their first hearing at Westminster Magistrates' Court.</li> <li>On 26 July 2023, the defendants appeared at Southwark Crown Court for the first hearing.</li> <li>On 28 March 2025, all defendants plead not guilty to all charges.</li> <li>The trial is listed for early 2026.</li> </ul>	
Capita Oak Pension scheme, Henley Retirement Benefit scheme and Self-Invested Personal Pensions (sold through Sycamore Crown Ltd, Jackson Francis Ltd, TPS Land, CLP Brokers or PFR Services) and Trafalgar Multi Asset Fund (Operation Hazel)	UK (SFO)	2011 - 2017	UK	<ul style="list-style-type: none"> <li>On 22 May 2017, the SFO announced an investigation into alleged fraud involving the Capita Oak Pension and Henley Retirement Benefit schemes, along with Self-Invested Personal Pensions sold through Sycamore Crown Ltd, Jackson Francis Ltd, TPS Land, CLP Brokers, or PFR Services — investing in storage pods. The Trafalgar Multi Asset Fund invested in various products, and was also subject to the investigation.</li> </ul>	<ul style="list-style-type: none"> <li>The investigation is ongoing.</li> </ul>	

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				<ul style="list-style-type: none"> <li>It is estimated that potentially more than 1000 investors have been impacted. The total amount invested is estimated to be more than £120m.</li> </ul>		
Balli Group plc	UK (SFO)	[•] - 2013	UK	<ul style="list-style-type: none"> <li>Balli Steel plc, was a subsidiary and main trading entity within Balli Group plc. Balli Steel plc bought and sold steel worldwide, through short-term trade finance loans. In 2013, the company collapsed: it owed \$500 million in debt to more than 20 creditors.</li> <li>In 2014, the SFO opened an investigation and uncovered that Balli secured bank loans by providing false shipping documents and misleading information as well as forging signatures on false contracts.</li> </ul>	<ul style="list-style-type: none"> <li>By February 2023 various executives were implicated: (i) Nasser Alaghband (former director of Balli Group and the CEO of Balli Steel plc) pleaded guilty to fraud prior to the trial; (ii) Louise Worsell (Managing Director, Balli Steel Middle East FZE) and; (iii) Melis Erda (Ballio Group Treasurer and member of Balli Steel plc's Executive Committee) were convicted on multiple counts of conspiracy to defraud.</li> <li>In April 2023, Alaghband was sentenced to six and a half years imprisonment and disqualified from serving as a director for 12 years; (ii) Erda was sentenced to 46 months imprisonment and disqualified from serving as a director for six years; (iii) Worsell was sentenced to 38 months imprisonment and disqualified from being a director for six years.</li> </ul>	<ul style="list-style-type: none"> <li>The SFO investigation involved a "record-breaking degree of international cooperation" with the SFO gathering information and evidence from law enforcement agencies in 36 jurisdictions.</li> </ul>

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					<ul style="list-style-type: none"> <li>David Spriddell (former Finance Director of Balli Steel plc) was found not guilty of fraudulent trading and Vahid Alaghband (former director of Balli Group) was severed from the trial in November 2022.</li> <li>On 1 December 2023, the SFO secured over £466,000 from the former Balli Steel Plc. executives who are serving their sentences in prison.</li> </ul>	
<b>2021</b>						
Raedex Consortium	UK (SFO, NCA, City of London Police, NECC, FCA, Surrey Police)	2012-2021	UK	<ul style="list-style-type: none"> <li>On 09 April 2021, the SFO announced that with the assistance of several agencies, it was investigating suspected fraud in relation to the activities of Raedex Consortium including the companies Buy2Let Cars, PayGo Cars, Raedex trading as Wheels4Sure and Rent2Own Cars.</li> </ul>	<ul style="list-style-type: none"> <li>The SFO's investigation continues.</li> </ul>	<ul style="list-style-type: none"> <li>On 08 April 2021, the SFO, NCA and City of London Police conducted searches on two residential premises; they arrested and interviewed one individual and interviewed one other individual.</li> <li>On 20 October 2021, the SFO arrested and interviewed a suspect.</li> </ul>
Gupta Family Group Alliance	UK (SFO)	[•]	UK	<ul style="list-style-type: none"> <li>On 14 May 2021 the SFO announced it was investigating fraud, fraudulent trading and money laundering in relation to the financing and conduct of businesses in the Gupta Family Alliance Group; this included</li> </ul>	<ul style="list-style-type: none"> <li>The SFO's investigation continues.</li> </ul>	<ul style="list-style-type: none"> <li>HMRC has dropped court cases to wind up four companies run by Sanjeev Gupta over unpaid tax bills totalling more than £26m. The SFO investigations continue.</li> </ul>

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				<p>regarding its financing arrangements with Greensill Capital UK Ltd.</p> <ul style="list-style-type: none"> <li>On 27 April 2022, the SFO investigators across the UK issued notices under Section 2 of the Criminal Justice Act 1987 at addresses linked with Sanjeev Gupta's GFG Alliance, also known as the Liberty House Group of companies.</li> </ul>		
Bluu Solutions Limited and Tetris Projects Limited	UK (SFO)	2014 – 2016	UK	<ul style="list-style-type: none"> <li>Bluu and Tetris (subsidiaries of Jones Lang LaSalle ("JLL") Group) admitted to offences contrary to s.1 and s.7 of the Bribery Act 2010.</li> <li>Between March 2014 and July 2016, Bluu attempted to influence the tender process of five office refurbishment contracts, totalling approximately £11.5 million; four were successfully secured. Two senior directors of Bluu made payments totalling £466,858, including direct and indirect payments – meant to serve as inducements or rewards. The conduct of the two directors continued even after Bluu was acquired by the group that owned Tetris.</li> <li>In August 2016, the JLL Group Global Internal Audit team conducted a post-acquisition audit of Tetris and discovered the wrongdoing. Following an internal investigation, on 1 December 2016, JLL self-reported to the SFO and notified the US</li> </ul>	<ul style="list-style-type: none"> <li>On 19 July 2021, the SFO reached a DPA with Bluu and Tetris. Bluu admitted to four offences of bribery and one offence of failure to prevent bribery during the tender process. Tetris admitted to one offence of failure to prevent bribery.</li> <li>In accordance with the terms of the DPA: (i) both companies were required to pay a penalty of over £2.62 million and a disgorgement of profits of £604,407; and, (ii) Tetris was also required to follow a 24-month Compliance Plan, with which it successfully complied.</li> <li>On 28 July 2023, the SFO issued a notice of discontinuance as</li> </ul>	<ul style="list-style-type: none"> <li>The two DPAs share a common Statement of Facts.</li> <li>Per the terms of the DPA, the SFO was not limited from bringing prosecutions against any present or former directors, officers, consultants, agents or employees.</li> </ul>

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				<p>Department of Justice, Securities and Exchange Commission, and the UK Competition and Markets Authority.</p> <ul style="list-style-type: none"> <li>On 13 February 2017, the SFO launched an investigation.</li> </ul>	<p>Bluu and Tetris had complied with the terms of the 2021 DPA.</p>	
Alpha and Green Park group of companies	UK (SFO, Cleveland Police)	2014 - 2019	UK	<ul style="list-style-type: none"> <li>On 29 September 2021, the SFO and Cleveland Police conducted formal searches of properties, and arrested and interviewed a suspect.</li> <li>The SFO also issued several Section 2 notices, obliging companies to provide relevant information.</li> <li>The Alpha-branded companies are suspected of fraudulently misleading investors into purchasing leaseholds for student accommodation across the UK including in Leicestershire, Lancashire, Staffordshire and West Yorkshire.</li> <li>The Green Park-branded companies are suspected of misleading investors into purchasing leaseholds for holiday accommodation in Devon.</li> <li>It is expected that the directors of the companies have made approximately £20 million from their schemes.</li> </ul>	<ul style="list-style-type: none"> <li>The SFO's investigation continues.</li> </ul>	<ul style="list-style-type: none"> <li>It is expected that approximately £150 million was invested by approximately 1,500 investors (from around 50 different countries) through these leasehold schemes – on the promise of guaranteed 8-10% returns.</li> </ul>

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<b>2020</b>						
Bombardier Inc	UK (SFO)	2011	Indonesia, Sweden	<ul style="list-style-type: none"> <li>On 05 November 2020 the SFO announced that it is investigating Bombardier Inc over suspected bribery and corruption in relation to contracts and / or orders from Garuda Indonesia.</li> <li>The UK corruption probe is linked to the conviction of a former executive at airline Garuda Indonesia.</li> </ul>	<ul style="list-style-type: none"> <li>The SFO's investigation continues.</li> </ul>	<ul style="list-style-type: none"> <li>Bombardier's rail unit in Sweden faces an imminent decision on whether or not it will face criminal charges relating to a multimillion-dollar rail contract.</li> <li>In May 2020 Emirsyah Satar, former CEO to Garuda, was sentenced to eight years in prison for corruption and money laundering.</li> <li>Soetikno Soedardjo was sentenced to six years in prison in a separate trial.</li> <li>Both have filed appeals.</li> <li>Despite its parent company being investigated by the SFO, Bombardier's consortium has been granted £1.7 billion backing by the UK government to continue with projects in Egypt and Derby.</li> </ul>
Axiom Legal Financing Fund	UK (SFO)	2010-2012	UK, Cayman Island	<ul style="list-style-type: none"> <li>Timothy Schools and Richard Emmett have been accused of carrying out a multimillion-pound scheme to divert money from the fund for their own benefit. Former independent advisor, David Kennedy, is also being charged.</li> <li>Mr Schools has been charged with three counts of fraudulent trading contrary to</li> </ul>	<ul style="list-style-type: none"> <li>Mr. Schools, Mr. Kennedy and Mr. Emmett appeared by video link at Westminster Magistrates' Court on 30 September 2020 and showed intention to deny fraud charges brought by the SFO.</li> </ul>	<ul style="list-style-type: none"> <li>The SFO's investigation was launched in July 2014, publicly announced in May 2017 and charging decision was announced 21 August 2020.</li> </ul>

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				<p>Section 993(1) of the Companies Act 2006, one count of fraud, contrary to Section 1 of the Fraud Act 2006, and one count of transferring criminal property, contrary to Section 327(1)(d) of the Proceeds of Crime Act 2002.</p> <ul style="list-style-type: none"> <li>Mr Emmett has been charged with one count of fraudulent trading, contrary to Section 993(1) of the Companies Act 2006, and one count of being concerned in an arrangement which facilitates the acquisition, retention, use or control of criminal property by another, contrary to Section 328(1) of the Proceeds of Crime Act 2002.</li> <li>Mr Kennedy is charged with one count of fraudulent trading contrary to Section 993(1) of the Companies Act 2006.</li> </ul>	<ul style="list-style-type: none"> <li>All three defendants were granted bail by Judge Walker on condition that they surrender their passports for the duration of the SFOs trial.</li> <li>The defendants appeared at Southwark Crown Court on 28 October 2020 to enter their pleas. They all pleaded not guilty.</li> <li>The defendants were scheduled to stand trial on 21 March 2022.</li> <li>On 9 August 2022 Mr. Schools was sentenced to 14 years on 5 counts of fraudulent trading, fraud by abuse of position and money laundering. Mr. Emmet was acquitted on all charge</li> </ul>	
GPT Special Project Management Ltd (Airbus)	UK (SFO) France (PNF) USA (DOJ)	2011-2015	UK, USA, France, Sri Lanka, Malaysia, Indonesia, Taiwan, Saudi Arabia and Ghana	<ul style="list-style-type: none"> <li>As of 30 July 2020, Managing Director Jeffrey Cook and former financial officer John Mason have been charged jointly with one count of corruption, contrary to section 1 of the Prevention of Corruption Act 1906 due to contracts awarded between January 2007 and December 2012 to GPT for work carried out for the Saudi Arabian National Guard.</li> <li>Mr Cook has also been charged with misconduct in public office, a common law offence, between September 2004 and</li> </ul>	<ul style="list-style-type: none"> <li>The case against GPT and the related individuals continues.</li> <li>On 28 April 2021, GPT plead guilty to one count of corruption (contrary to section 1 of the Prevention of Corruption Act 1906) between December 2008 and July 2010 in relation to contracts for work carried out for the Saudi Arabian National Guard. The judge has ordered</li> </ul>	<ul style="list-style-type: none"> <li>On 30 July 2020 Airbus subsidiary, GPT Special Project Management Ltd, and three linked individuals, saw a slew of new charges against the company over its work in Saudi Arabia</li> <li>These cases were sent to Southwark Crown Court on 14 September 2020.</li> </ul>

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				<p>November 2008 over commissions paid to him on contracts with ME Consultants while an employee of the UK's Ministry of Defence.</p> <ul style="list-style-type: none"> <li>An individual, Terence Dorothy, has been charged with aiding and abetting that corruption.</li> </ul>	<p>payment of a confiscation order of £20,603,000, fine of £7,521,920, and costs of £2,200,000.</p>	
Airbus (Aerospace)	SE UK (SFO) France (PNF) USA (DOJ)	2011-2015	UK, USA, France, Sri Lanka, Malaysia, Indonesia, Taiwan and Ghana	<ul style="list-style-type: none"> <li>In 2012 the Munich Public Prosecutor initiated an investigation into the alleged paying of \$2.5 billion worth of bribes paid by Airbus SE ("Airbus"), in 2003, relating to the sale of 18 Eurofighter jets to the Austrian government.</li> <li>The SFO investigation was opened in July 2016.</li> <li>The SFO was investigating allegations of fraud, bribery and corruption in the civil aviation business of Airbus. These allegations related to irregularities concerning third party consultants.</li> <li>The conduct involves Airbus' Commercial and Defence &amp; Space divisions.</li> <li>The conduct covered took place across five jurisdictions: Sri Lanka, Malaysia, Indonesia, Taiwan and Ghana.</li> <li>Airbus made payments totalling £6,520,386 and promised a further payment of £1,407,452 that was never paid.</li> </ul>	<ul style="list-style-type: none"> <li>On 9 February 2018, Airbus paid \$99 million to the Munich Public Prosecutor, to settle the German authorities' investigation into the sale of Eurofighters to the Austrian government.</li> <li>The SFO entered into a record-breaking DPA with Airbus on 31 January 2020 covering five counts of failure to prevent bribery.</li> <li>Airbus paid €3.6bn in total to authorities in France, the UK and the USA.</li> <li>In the UK under the terms of a DPA, Airbus agreed to pay a total of €991m: €398,034,571 (fine); €585,939,740 (disgorgement of profits); and €6,989,401 (SFO's Costs).</li> </ul>	<ul style="list-style-type: none"> <li>The SFO investigation remains active and the position in relation to individuals is being considered.</li> <li>On 26 March 2020, it was announced that investigations into bribery allegations against former Airbus-linked individuals by French prosecutors continue unabated despite the coronavirus pandemic.</li> </ul>



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				<ul style="list-style-type: none"> <li>In total the gains attributable to the bribe were calculated to be £492,347,585.</li> </ul>	<ul style="list-style-type: none"> <li>In addition, Airbus agreed to pay €2.1bn to the French authorities and just over €525.6m to the US authorities.</li> <li>The DPA specifically carved out GPT Special Project Management Ltd, which was under separate SFO investigation.</li> </ul>	
<b>2019</b>						
Glencore group of companies	UK (SFO), USA, Cameroon (NACC) and Brazil	2007 onwards	UK, USA, Brazil, Cameroon, Equatorial Guinea, Ivory Coast, Nigeria, and South Sudan	<ul style="list-style-type: none"> <li>Between 2011 and 2015, an SFO investigation revealed that Glencore engaged in bribery to enhance its oil trading profits across five African countries, with bribes totalling \$29 million and disguised as various fees in financial reports.</li> <li>On 5 December 2019, the SFO confirmed that it was investigating suspicions of bribery in the conduct of business by the Glencore PLC ("Glencore") group of companies, its officials, employees, agents and associated persons.</li> <li>On 24 May 2022, the SFO exposed profit-driven bribery and corruption across the company's oil operations in Cameroon, Equatorial Guinea, Ivory Coast, Nigeria, and South Sudan. The SFO's case is that, with the company's approval, agents and</li> </ul>	<ul style="list-style-type: none"> <li>The UK sentencing has been set for 21 June. At a hearing in New York, the Glencore agreed to pay over \$1.1 billion to resolve the US investigation. It also agreed to pay \$39.6 million under a resolution signed with the Brazilian Federal Prosecutor's Office.</li> <li>In August 2024, the SFO initially charged five former employees (later a total of six former employees) with conspiring to make corrupt payments to benefit Glencore's oil operations in West Africa, involving oil contracts in Cameroon, Nigeria, and the Ivory Coast from 2007 to 2014. Of those charged, Andrew</li> </ul>	<ul style="list-style-type: none"> <li>In July 2018, Glencore was subpoenaed by the US justice department over possible violations of the Foreign Corrupt Practices Act relating to its operations in Nigeria, Venezuela and the Democratic Republic of Congo. It is also under investigation by the Commodity Futures Trading Commission, the US commodity market regulator, and in Brazil as part of the sprawling Car Wash corruption and bribery scandal.</li> <li>Cameroon's anti-corruption agency has set up a commission of enquiry to investigate Glencore in June 2022.</li> </ul>

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				<p>employees paid bribes worth over \$25 million for preferential access to oil.</p> <ul style="list-style-type: none"> <li>On 21 June 2022, the SFO secured Glencore conviction on seven counts of international bribery.</li> </ul>	<p>Gibson and Martin Wakefield were also charged with falsifying invoices related to service fees to a Nigerian oil consultancy from 2007 to 2011.</p> <ul style="list-style-type: none"> <li>The SFO conviction led to a penalty of £182,935,392, a confiscation order of £93,479,338.95, and SFO investigation and prosecution costs of £4,550,362 for Glencore.</li> </ul>	
Roger Thomas Jenkins, Richard Kalaris, Boath (Banking)	UK (SFO)	2008	UK and Qatar	<ul style="list-style-type: none"> <li>The SFO charged Mr. Jenkins (former executive chairman of Barclays Capital), Mr. Kalaris (former head of Wealth Management) and Mr Boath (former head of European financial institutions) with substantive fraud contrary to section 1 Fraud Act 2006 as well as conspiracy to commit fraud by false representation under section 1 Criminal Law Act 1977, in relation to a June 2008 capital raising. Mr Jenkins was also charged with an additional count of conspiracy to commit fraud by false representation in relation to the same capital raising.</li> <li>The defendants allegedly conspired to hide fees of hundreds of millions of pounds paid to Qatar's sovereign wealth fund by Barclays in return for two loans totalling almost £4 billion.</li> </ul>	<ul style="list-style-type: none"> <li>Mr Boath did not give evidence in his defence.</li> <li>On 28 February 2020, all three individuals were acquitted of all wrongdoing.</li> <li>The jury took five hours to deliver the verdict. Mr Justice Jay ruled that there was no case to answer on legal grounds for all of the defendants.</li> </ul>	<ul style="list-style-type: none"> <li>This was the UK's first trial of bank executives for misconduct during the 2008 Financial Crisis.</li> <li>On 28 February 2020 charges against Barclays (as a corporate entity) were dismissed in relation to the same capital raising because the bank's board were largely kept in the dark about talks with Qatari investors. This led to issues in satisfying the court that the 'directing mind and will' criteria had been met.</li> <li>On 29 April 2020, the FCA confirmed that following his acquittal in the SFO trial in February, Mr. Jenkins is no longer subject to a UK regulatory probe.</li> </ul>

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De La Rue plc (Procurement)	UK (SFO)	2011 onwards	UK, South Sudan	<ul style="list-style-type: none"> <li>De La Rue plc ("De La Rue"), the company responsible for printing banknotes for countries worldwide, including the UK and South Sudan, is being investigated by the SFO in relation to suspected corruption in De La Rue's activities in South Sudan.</li> </ul>	<ul style="list-style-type: none"> <li>The SFO's investigation into De La Rue closed on 16 June 2020 with no charges being brought. After an 11-month investigation, the SFO stated that the case did not meet the test for prosecution.</li> </ul>	<ul style="list-style-type: none"> <li>On 23 July 2019, De La Rue pledged to cooperate fully with the SFO's investigation.</li> </ul>
Greenergy International Ltd (Energy)	UK (SFO)	2018 and earlier	UK, Netherlands	<ul style="list-style-type: none"> <li>The SFO has opened a joint investigation with the Dutch authorities concerning certain aspects of biodiesel trading at Greenergy International Ltd ("Greenergy") and various third parties.</li> <li>Searches were conducted on 30 April 2019 at five sites across the UK.</li> <li>Four individuals have been arrested and released without charge.</li> </ul>	<ul style="list-style-type: none"> <li>In December 2019, the SFO informed Greenergy that the company and their employees are no longer suspects in an ongoing investigation.</li> </ul>	<ul style="list-style-type: none"> <li>On 25 February 2021 Gianni Rivera (a biodiesel trader) was charged with two counts of fraud by abuse of position (contrary to section 1 of the Fraud Act 2006) and one count of money laundering (contrary to section 328(1) of the Proceeds of Crime Act 2002).</li> </ul>
<b>2018</b>						
Guralp Systems Ltd (Seismic equipment)	UK (SFO)	2002-2015	South Korea	<ul style="list-style-type: none"> <li>The SFO alleged that three former employees of Guralp Systems Ltd ("Guralp Systems") conspired together over a 13-year period to make corrupt payments to a public official employed in the Korean Institute of Geoscience and Mineral Resources ("KIGAM").</li> <li>The individuals charged with the offence were the founder, Dr. Cansun Guralp, the ex-</li> </ul>	<ul style="list-style-type: none"> <li>On 18 and 20 December 2019, Dr Guralp, Mr Bell and Ms Pearce were acquitted of bribery charges following a nine-week trial which began in October 2019.</li> <li>Under the terms of the DPA, Guralp agreed to pay a total of £2,069,861 by way of disgorgement of gross profits but no deadline was imposed for the</li> </ul>	<ul style="list-style-type: none"> <li>A KIGAM director was prosecuted by the DOJ in the US and was found guilty of laundering at least \$1m worth of bribes from two companies, including Guralp Systems, and was sentenced to 18 months' imprisonment and ordered to pay a \$15,000 fine.</li> <li>On 20 December 2019, the three former employees of Guralp Systems that were charged with conspiracy to</li> </ul>

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				Managing Director, Andrew Bell and an employee, Natalie Pearce.	<p>payment due to the financial difficulties Guralp Systems is currently facing.</p> <ul style="list-style-type: none"> <li>Guralp Systems is also required to cooperate fully and truthfully with the SFO and to review and maintain its existing internal controls, policies and procedures regarding compliance with the Bribery Act 2010.</li> <li>Guralp Systems has not been ordered to pay a financial penalty as it would put the company out of business.</li> <li>The DPA is valid for five years, expiring in 2024.</li> </ul>	<p>make corrupt payments were all acquitted.</p> <ul style="list-style-type: none"> <li>The unsuccessful prosecution is said to have cost the SFO £3.7 million.</li> <li>On 21 November 2024, the SFO informed the court that the terms of the DPA are believed to have been breached and requested a hearing at Southwark Crown Court.</li> <li>Guralp argued that the court lacked jurisdiction to consider a breach as the DPA had expired, but Davis LJ held that it was still effective, based on ordinary principles of contractual construction. <i>See our article <a href="#">here</a>.</i></li> </ul>
Alca Fasteners Ltd (Industrial Supplies)	UK (SFO)	2008-2017	Norway	<ul style="list-style-type: none"> <li>Alca Fasteners Ltd ("Alca") is under investigation for allegedly making payments to secure Norwegian contracts for a total of \$700,000.</li> </ul>	<ul style="list-style-type: none"> <li>The SFO's investigation continues.</li> <li>Ex-director, Carole Ann Hodson pleaded guilty to charges in May 2019.</li> <li>In July 2019, Hodson was sentenced to two years in jail and ordered to pay more than £4.5 million in fines.</li> <li>The probe into the company is still ongoing.</li> </ul>	<ul style="list-style-type: none"> <li>Alca self-reported concerns regarding conduct to the SFO in the summer of 2017 after a new management team took over the business.</li> <li>In January, the SFO passed on information to the Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime. This resulted in the conviction of Norwegian businessman Terje Vidar Moe, who pleaded guilty to receiving bribes.</li> </ul>

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Rapid Engineering Supplies Limited / Kevin Herbert/ John Payne/Neil Simpkins (Engineering)	UK (CPS)	2011-2013	UK	<ul style="list-style-type: none"> <li>Rapid Engineering Supplies Limited ("RES") has been charged with failing to put in place adequate procedures to prevent bribery between December 2011 and March 2013, under section 7 of the Bribery Act.</li> <li>In addition to RES, there are another 3 individual defendants: <ul style="list-style-type: none"> <li>Kevin Herbert (34, faces 3 bribery charges);</li> <li>John Payne (54, faces 1 bribery charge); and</li> <li>Neil Simpkins (46, director, faces 1 bribery charge).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>At a hearing on 19 December 2019, prosecutors dropped the case against RES, citing insufficient evidence as the reason for doing so.</li> <li>Bribery charges against Mr Simpkins and Mr Payne have been terminated.</li> <li>Mr Herbert pleaded guilty to a bribery charge on 19 December 2019 and his sentencing has been postponed because of COVID-19.</li> </ul>	<ul style="list-style-type: none"> <li>The failure to prevent charge is the second such contested charge since the Bribery Act 2010 came into force.</li> </ul>
Caracal Energy (formerly Griffiths Energy) / Ikram Saleh (Energy)	UK (SFO)	2013	USA, Canada and Chad	<ul style="list-style-type: none"> <li>Caracal Energy bribed Chadian diplomats at the Chadian Embassy in Washington DC with discounted shares deals and 'consultancy fees' using a front company, 'Chad Oil'.</li> <li>Chad Oil was a vehicle used by senior diplomats at the Chadian Embassy to the United States to facilitate a deal which saw the wife of the former Deputy Chief, Mrs Ikram Saleh, purchase 800,000 shares in Caracal Energy at less than 0.001\$CAD each, later selling them for £4.4 million profit.</li> </ul>	<ul style="list-style-type: none"> <li>Caracal Energy pleaded guilty to bribery after self-reporting.</li> <li>On 22 March 2018, the High Court granted an order allowing the SFO to recover the £4.4 million, the first time money has been returned from overseas in a civil recovery case.</li> <li>The recovered money will be transferred to the Department for International Development who will identify key projects to invest in that will benefit the poorest people in Chad.</li> </ul>	

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Skansen Interiors Limited (Refurbishment)	UK (NCA, City of London Police and the CPS)	2013	UK	<ul style="list-style-type: none"> <li>In 2014, Skansen Interiors Limited ("Skansen Interiors") filed a "suspicious activity report" with the NCA and reported suspected bribery to the City of London Police.</li> <li>The self-reports concerned bribes paid by Stephen Banks, the company's former managing director, to Graham Deakin, a former real estate project manager at DTZ Debenham Tie Leung.</li> <li>The bribes secured contracts worth £6 million to refurbish London offices.</li> </ul>	<ul style="list-style-type: none"> <li>The two-day trial ran in February 2018, marking the first contested case of section 7 since the Bribery Act came into force in 2011.</li> <li>The jury were not persuaded that there were sufficient controls put in place by Skansen Interiors to prevent bribery, and so the company's attempted use of the statutory defence contained within section 7 (implementing adequate procedures) failed.</li> <li>Skansen Interiors was found guilty on 22 February 2018. However, as the company has been dormant since 2014, the only sentence available to the judge was an absolute discharge. Accordingly, no penalties were imposed and as the conviction is deemed to be spent under the Rehabilitation of Offenders Act 1974, no conviction was registered on the company's record.</li> <li>Banks and Deakin both pleaded guilty under sections 1 and 2 of the Bribery Act. On 23 April 2018, Stephen Banks was</li> </ul>	<ul style="list-style-type: none"> <li>Despite the self-report, the company was formally charged in March 2017 for failure to prevent bribery under section 7 of the Bribery Act.</li> <li>Although a DPA was considered, the CPS decided against such a course of action because, given Skansen Interior's dormant status, there would be no ongoing benefit provided from a DPA.</li> <li>Analysis of this conviction is available: <u>"First contested UK prosecution for failing to prevent bribery leads to conviction"</u></li> </ul>

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					sentenced to 12 months' imprisonment and has been disqualified from acting as a director for 6 years and Graham Deakin was sentenced to 20 months' imprisonment and has been disqualified from acting as a director for 7 years and fined £10,697.54.	
Chemring Group PLC and Chemring Technology Solutions Limited ("CTSL") (Defence)	UK (SFO)	2011 and earlier	UK, US	<ul style="list-style-type: none"> <li>On 18 January 2018, Chemring Technology Solutions Limited ("CTSL") self-reported bribery, money laundering and corruption potentially undertaken by agents representing CTSL.</li> <li>On the same day, the SFO confirmed an investigation into the Chemring Group and CTSL over the alleged misconduct to secure contracts for CTSL in 2011, and an earlier contract won by CTSL (then named BDL at the time, prior to its acquisition in 2006).</li> </ul>	<ul style="list-style-type: none"> <li>The SFO's investigation continues.</li> </ul>	<ul style="list-style-type: none"> <li>Both contracts are described by a Chemring Group PLC ("Chemring Group") spokesperson as "small" and the historic misconduct was revealed during a routine audit.</li> <li>Another Chemring subsidiary was previously investigated by the SEC and the DOJ. However, the investigations ended in 2012 and 2013 respectively</li> <li>Chemring Group was not reported to be a suspect in the US investigations.</li> <li>In November 2018 Chemring Group revealed it has set aside £13 million to cover its legal fees linked to the probe.</li> </ul>

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<b>2017</b>						
Standard Chartered PLC (Banking)	UK (FCA)	2012-2015	Indonesia	<ul style="list-style-type: none"> <li>Standard Chartered PLC ("Standard Chartered") executives sat on the board of Maxpower, an Indonesian power plant builder, whose executives paid bribes to win business.</li> <li>An internal audit found that more than \$750,000 of the company's payments between 2014 and 2015 may have been bribes.</li> <li>It is alleged that the Standard Chartered executives were aware of Maxpower's fraudulent accounting and compliance failings, yet did not do anything to prevent them.</li> </ul>	<ul style="list-style-type: none"> <li>In February 2019, Standard Chartered received a decision notice from the FCA's Regulatory Decisions Committee imposing a penalty of £102,163,200 (net of a 30% early settlement discount) on the group.</li> <li>Alongside the payment to the FCA, the group will also pay \$947 million in monetary penalties to five US agencies, including the DOJ.</li> </ul>	<ul style="list-style-type: none"> <li>The group continues its discussions relating to an investigation by the US authorities relating to historical violations of US sanctions laws and regulations.</li> </ul>
Eurasian Natural Resources Corporation ("ENRC") (Mining)	UK (SFO)	2013	Democratic Republic of the Congo, Kazakhstan	<ul style="list-style-type: none"> <li>Eurasian Natural Resources Corporation ("ENRC"), a mining conglomerate owned by Kazakh oligarchs, is being investigated over allegations of fraud, bribery and corruption.</li> <li>In February 2013, the SFO received a whistle-blower report in relation to the above allegations concerning ENRC's subsidiary in Kazakhstan.</li> <li>Furthermore, there are allegations that ENRC made large payments to offshore companies to secure mining rights in the</li> </ul>	<ul style="list-style-type: none"> <li>This case involved a dispute as to whether documents generated during a company's internal investigation process attracted legal privilege. The Court of Appeal ruled in ENRC's favour, holding that litigation privilege applies to documents created during an investigation before any prosecution is commenced and before the company has discovered evidence sufficient to justify a prosecution.</li> </ul>	<ul style="list-style-type: none"> <li>ENRC de-listed itself from the LSE in 2013 due to corporate governance concerns and the SFO investigation. It is now owned by the Eurasian Resources Group.</li> <li>Analysis on the privilege decision in SFO v ENRC is available: "<a href="#"><i>ENRC – Where does it really leave us?</i></a>"</li> <li>ENRC succeeding in persuading a US Court to compel the release of documents from a US consultant who provided advisory services to ENRC.</li> </ul>



Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				Democratic Republic of the Congo at a significant undervalue.	<ul style="list-style-type: none"> <li>On 26 March 2019, ENRC filed a £70 million damages claim against the SFO over its on-going corruption probe. It has also threatened to seek a judicial review of the SFO's approach to investigating the miner's UK subsidiary.</li> <li>On 03 December 2020 in a High Court, Judge Julia Clark said that ENRC will face a civil trial against former prime minister of Kazakhstan Ake-Jean Qajygeldin over claims that he unlawfully obtained confidential information about the mining company and handed it to the SFO. ENRC and the former prime minister reached a settlement in January 2022.</li> <li>On 24 August 2023, the SFO closed the investigation into ENRC on the basis that there was insufficient evidence.</li> <li>In October 2024, the SFO reached an undisclosed last minute settlement with ENRC. The damages claim against Dechert is still ongoing.</li> </ul>	<p>ENRC persuaded the court that it would help the company find the source of a series of leaks about the SFO's investigation.</p> <ul style="list-style-type: none"> <li>On 14 February 2020, ENRC's two damages suits (one against the Serious Fraud Office and one against law firm Dechert plus lawyer Mr. Gerrard) were joined.</li> <li>On 03 November 2020, a London Court heard a damages claim, which focused on an attempt by ENRC to strike out a claim of harassment made by Mr. Gerrard. On 27 November 2020, the court held that ENRC could not strike out the harassment claim.</li> <li>On 28 January 2021 ENRC named John Gibson, SFO's former lead on bribery, as a defendant as part of its damage suit against the SFO. The SFO denied claims.</li> <li>In September 2021, the High Court ruled that the SFO opened the investigation in 2013 after Dechert and Neil Gerrard disclosed privileged material. The court found that there was gross and deliberate breach of duty, and found the SFO, Dechert and Neil Gerrard liable for wrongdoing.</li> </ul>

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Formula One Group (Auto racing)	UK (SFO)	2013	UK	<ul style="list-style-type: none"> <li>Formula One Group ("Formula One") confirmed that the SFO had begun a pre-investigation into the sport on 27 August 2017.</li> <li>Whilst the SFO is currently only at the pre-investigation stage it is understood that their concerns relate to the 2013 Concorde Implementation Agreement which underpins Formula One. The Agreement removed the voting rights of the smaller Formula One teams, increased those of the sport's owner, Liberty Media, and regulator, Fédération Internationale de l'Automobile the ("FIA"), and granted the FIA a 1% shareholding for £360,000. The FIA subsequently sold this shareholding realising a £62 million profit.</li> <li>Formula One's \$5 million payment to FIA in 2013 is also under scrutiny in the UK.</li> </ul>	<ul style="list-style-type: none"> <li>The SFO's investigation continues.</li> </ul>	<ul style="list-style-type: none"> <li>The SFO's pre-investigation was prompted by a tip-off from Damian Collins, an MP and chairman of the Culture, Media and Sport Select Committee.</li> </ul>
British American Tobacco PLC (Tobacco)	UK (SFO)	2015 and earlier	UK, Kenya	<ul style="list-style-type: none"> <li>The SFO confirmed on 01 August 2017 that it was investigating suspicions of corruption in the conduct of British American Tobacco PLC's ("BAT") business.</li> <li>No further details were provided by the SFO or by BAT's press release; however, the investigation reportedly relates to allegations that BAT had bribed officials in East Africa.</li> </ul>	<ul style="list-style-type: none"> <li>On 15 January 2021, the SFO closed its investigation into BAT. The SFO stated that the case did not meet the test for prosecution.</li> <li>The SFO will continue to offer assistance to the ongoing investigations of other law enforcement partners.</li> </ul>	<ul style="list-style-type: none"> <li>Allegations in relation to BAT paying bribes in East Africa were first aired by whistle-blower Paul Hopkins, who told the BBC Panorama Programme on 30 November 2015 that he had paid bribes on behalf of BAT to undermine anti-smoking laws and to gain market share in Kenya. In December 2015, Mr Hopkins handed his documents to the SFO.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
						<ul style="list-style-type: none"> <li>In February 2016, BAT announced that it had hired lawyers to investigate the allegations of bribery.</li> <li>In its Annual Report, BAT has said it's too early to predict the possible sanctions that could arise but warned it could include the prosecution of individuals and one or more company units.</li> <li>On 30 March 2020, BAT confirmed that it faces a US investigation by the DOJ and OFAC into possible sanctions breaches. The company said it was cooperating with the investigations.</li> </ul>
Rio Tinto Group (Mining and Natural Resources)	UK (SFO)	2008	UK, Republic of Guinea	<ul style="list-style-type: none"> <li>On 24 July 2017, the SFO announced that it was investigating the activities of Rio Tinto Group.</li> <li>The investigation relates to a \$10.5 million payment made in 2011 by Rio Tinto Group to Francois Polge de Combret, a consultant working on the Simandou iron ore deposit in the Republic of Guinea.</li> </ul>	<ul style="list-style-type: none"> <li>The SFO's investigation continues.</li> </ul>	<ul style="list-style-type: none"> <li>Following an internal investigation into the \$10.5 million payment to Francois Polge de Combret, Rio Tinto Group, in November 2016, self-reported to the SFO, US DOJ and the Australian Federal Police, and fired Alan Davies, CEO of its Energy and Minerals Division, and Debra Valentine, Head of Legal Affairs, for failures "to maintain the standards expected of them under our global code of conduct".</li> <li>The \$10.5 million payment was reportedly made in the context of Rio</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
						Tinto Group securing its claim to the southern half of the Simandou deposit, the northern half having been confiscated by the previous Guinean government in 2011 with a \$700 million payment to the new government of President Alpha Conde. Francois Polge de Combret was reportedly close to the new President.
John Wood Group PLC (Formerly: Amec Foster Wheeler PLC) (Oil Services)	UK (SFO)	1996-2014	UK, USA, Nigeria, Saudi Arabia, Malaysia, India and Brazil	<ul style="list-style-type: none"> <li>The SFO confirmed on 11 July 2017 that it had opened an investigation into the activities of John Wood Group PLC ("John Wood") and persons associated with the company for suspected corruption offences.</li> </ul>	<ul style="list-style-type: none"> <li>On 25 June 2021, the SFO confirmed it had entered a DPA in principle with Amec Foster Wheeler Energy Limited.</li> <li>The DPA was approved on 01 July 2021 and under its terms Amec Foster Wheeler Energy Limited will pay £103 million towards financial penalties and costs in the UK. This payment includes the SFO's costs of £3.4 million, and a compensation payment of £210, 610 to the people of Nigeria.</li> <li>This is part of a global settlement of US\$177 million with American, British and Brazilian authorities.</li> </ul>	<ul style="list-style-type: none"> <li>John Wood's press releases have indicated that the SFO investigation is not expected to affect its ongoing \$2.2 billion takeover by Wood Group.</li> <li>On 10 March 2020, John Wood said that it expected to pay \$46 million to settle legacy bribery investigations by authorities in the US, Brazil and Scotland, but the Scottish engineering group doesn't know how much a probe by the UK's Serious Fraud Office will end up costing.</li> </ul>

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Petrofac Limited (Oil and Gas)	UK (SFO)	2002-2009	UK, Kazakhstan	<ul style="list-style-type: none"> <li>On 12 May 2017, the SFO announced that it was investigating the activities of Petrofac Limited ("Petrofac").</li> <li>The investigation is related to the SFO's ongoing investigation into the activities of Unaoil, a Monaco-based consultancy that worked with Petrofac, primarily in Kazakhstan between 2002 and 2009.</li> <li>Petrofac has been cooperating with the SFO, including: <ul style="list-style-type: none"> <li>(i) engaging with the SFO regarding interviews of senior directors either under section 2 of the Criminal Justice Act 2003 or under caution; and</li> <li>(ii) providing relevant documents to the SFO.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Marwan Chedid (COO) and Ayman Asfari (CEO) were arrested and questioned by the SFO but released without charge.</li> <li>In February 2019 David Lufkin (former global head of sales) pleaded guilty to 11 counts of bribery, admitting offences related to the awarding of corrupt contracts worth \$370 million in Iraq and more than \$3.5 billion in Saudi Arabia.</li> <li>On 14 January 2021 David Lufkin pleaded guilty at Westminster Magistrates' Court to three counts of bribery amounting to \$30 million in connection with contracts awarded in Abu Dhabi. These charges are in addition to eleven charges of bribery already brought by the SFO, to which Mr Lufkin pleaded guilty in February 2019.</li> <li>On 01 October 2021, Petrofac Limited pleaded guilty to seven counts of failing to prevent bribery (worth £32 million) to help Petrofac Group win more than</li> </ul>	<ul style="list-style-type: none"> <li>The SFO announced in May 2017 that Petrofac was not doing enough to support its investigation.</li> <li>On 25 May 2017, Petrofac announced that its COO, Marwan Chedid, had been suspended until further notice and resigned from the board, and offered its support to the SFO.</li> <li>In light of the SFO's investigation, Petrofac has announced a planned compliance overhaul.</li> <li>On 24 September 2021 (following an SFO requisition), Petrofac Limited was charged with seven offences of failing to prevent bribery.</li> <li>Mr Lufkin was sentenced for committing fourteen counts of bribery; he was given a two-year custodial sentence, which was suspended for 18 months.</li> <li>On 15 December 2021, the SFO secured a £141,000 confiscation order against David Lufkin.</li> <li>On 16 February 2024, the SFO charged former Petrofac executives Marwan Chedid and George Salibi with bribery. Both held senior positions within Petrofac Group in the</li> </ul>

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					<p>£2.6 billion contracts in the oil and gas industry in Iraq, Saudi Arabia, and the United Arab Emirates between 2011 – 2017.</p> <ul style="list-style-type: none"> <li>On 04 October 2021, Petrofac Limited was ordered to pay £77 million (confiscation costs of £22,836,985, a fine of £47,197,640 and the SFO's costs of £7 million).</li> <li>On 29 April 2022, the SFO announced that it has recovered £567,466.53 from personal bank accounts linked to Basim Al Shaikh (a former Petrofac “fixer”, now deceased). The accounts were identified and then frozen by the SFO on 3rd February 2021, on suspicion of containing the proceeds of crime.</li> </ul>	UAE. The SFO alleges that between 2012 and 2018, that the Chedid and Salibi were involved in offering and paying over \$30 million in bribes to secure contracts worth around \$3.3 billion for Petrofac, including projects such as the Upper Zakum Field Development Project in the UAE.
KBR Inc. (Engineering and Construction)	UK (SFO)	2005-2011	UK, USA	<ul style="list-style-type: none"> <li>On 28 April 2017, the SFO announced that it was investigating the activities of KBR Inc (“KBR”) and its UK subsidiaries.</li> <li>KBR, a Houston-based oil services firm, made a US Securities and Exchange Commission filing on 28 April 2017 stating that the SFO had issued a section 2 notice in a probe of the company's business relationship with Unaoil.</li> </ul>	<ul style="list-style-type: none"> <li>On 18 March 2021, the SFO closed its investigation into the activities of KBR Inc.'s UK subsidiaries, their officers, employees and agents. The SFO stated that the case did not meet the test for prosecution.</li> </ul>	<ul style="list-style-type: none"> <li>On 17 April 2018, it was announced that Jan Egil Braendeland, president of KBR's oil and gas business, was arrested as part of the SFO's investigation into the company. Mr. Brændeland wasn't charged with any offence and was released soon afterwards.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
						<ul style="list-style-type: none"> <li>• KBR filed for a judicial review of the SFO's power to confiscate documents held overseas.</li> <li>• The hearing took place on 17 April 2018 and judgment was reserved.</li> <li>• In September 2018 the High Court ruled that the SFO had the right to seize documents held by KBR's parent company in the US.</li> <li>• On 29 May 2019 the Supreme Court granted KBR leave to appeal this decision.</li> <li>• KBR and the SFO appeared in the Supreme Court on 13 October 2020 despite the closing of bribery investigations in early August 2020.</li> <li>• On 05 February 2021, the Supreme Court delivered its ruling allowing KBR's appeal. The ruling stated that there was no basis for the Divisional Court's finding that the SFO could use the power in section 2(3) of the Criminal Justice Act 1987 to require foreign companies to produce documents held outside the UK.</li> <li>• The ruling was based on the presumption that legislation is generally not intended to have extra-territorial effect and this presumption</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
						<p>arises from requirements of international law and the concept of comity. The judges stated that if Parliament meant for section 2(3) to override this presumption then there would have been express wording provided in the legislation to guarantee this effect. Furthermore, legislative history indicated that where Parliament intended that evidence should be obtained from abroad, reciprocal arrangements for co-operation with other countries would be the route taken.</p> <ul style="list-style-type: none"> <li>The effects of this judgment provide more certainty to the scope of the SFO's power to request documents which clearly do not extend extra-territorially to foreign companies.</li> </ul>



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ABB Ltd (Engineering)	UK (SFO)	2005-2011	UK	<ul style="list-style-type: none"> <li>On 10 February 2017, the SFO announced that it had commenced an investigation into the activities of the UK subsidiaries of ABB Ltd ("ABB") (a Swiss incorporated engineering company), as well as their officers, employees and agents for suspected offences of bribery and corruption.</li> </ul>	<ul style="list-style-type: none"> <li>On 19 May 2020, the SFO announced that it was dropping its corruption probe into ABB and that it had concluded its case. The SFO stated that the case did not meet the test for prosecution.</li> </ul>	<ul style="list-style-type: none"> <li>The case is linked to the SFO's ongoing investigation into Monaco-based oil services company Unaoil.</li> <li>In a financial report, released 08 February 2017, ABB announced that it had self-reported matters to the SFO, US Securities and Exchange Commission and DOJ "<i>concerning certain of its past dealings with Unaoil and its subsidiaries, including alleged improper payments made by these entities to third parties.</i>"</li> <li>On 28 March 2019, ABB said that an internal investigation had turned up concerns about ABB's dealings with Eskom, the South African state power utility, and related persons. In a filing with the SEC it also mentioned a previously disclosed internal investigation relating to Unaoil.</li> </ul>
Rolls-Royce plc (Engineering, defence, energy)	UK (SFO) USA (DOJ) Brazil (Ministério Público Federal, and Ministry of Transparency and Comptroller General of the Union) Indonesia (Corruption)	1989-2013	UK, Indonesia, China, India, Thailand, Russia, Nigeria and Malaysia	<ul style="list-style-type: none"> <li>Rolls-Royce plc ("Rolls-Royce") and one of its subsidiaries, Rolls-Royce Energy Systems Inc, faced six charges of conspiracy to corrupt (section 1 of the Prevention of Corruption Act), five charges of failure to prevent bribery (section 7 Bribery Act 2010) and one charge of false accounting relating to payments made by its civil aerospace, defence aerospace and energy businesses</li> </ul>	<ul style="list-style-type: none"> <li>On 7 November 2017, the US courts unsealed a multitude of charges filed against various Rolls-Royce individuals in the foreign bribery scheme by Rolls-Royce and its subsidiary. The details revealed were: <ul style="list-style-type: none"> <li>(i) On 28 July 2017, James Finley pleaded guilty to</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Additional investigations into Rolls-Royce were opened in early 2018 by Indonesia's Corruption Eradication Commission and Brazil's Ministry of Transparency and Comptroller General of the Union.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
	Eradication Commission)			<p>to intermediaries in several foreign jurisdictions.</p> <ul style="list-style-type: none"> <li>The payments made related to the award of large value contracts which, taken together, ultimately earned the business over £250 million gross profit.</li> </ul>	<p>one count of conspiracy to violate the Foreign Corrupt Practices Act ("FCPA"), and one count of violation of the FCPA.</p> <p>(ii) On 12 October 2017, Petros Contoguris was charged with one count of conspiracy to violate the FCPA, one count of conspiracy to money-launder, seven counts of violating the FCPA, and 10 counts of money-laundering.</p> <p>(iii) Aloysius Johannes Jozef Zuurhout, Andreas Kohler, and Keith Barnett each pleaded guilty to one count of conspiracy to violate the FCPA on 13 June, 6 June, and 20 December 2016 respectively.</p> <ul style="list-style-type: none"> <li>The SFO's investigation into the conduct of individuals in Rolls-Royce Civil, Defence, Marine and the Energy Division continues.</li> <li>On 17 January 2017, Sir Brian Leveson QC approved a</li> </ul>	<ul style="list-style-type: none"> <li>This is the third (and, by far, the largest) DPA approved by the English courts.</li> <li>The fine payable by Rolls-Royce was discounted by 50% from that which would have been imposed after a contested trial as a result of its "extraordinary" co-operation with the SFO investigation. This is greater than the maximum discount of 33% available for an early guilty plea, which, prior to the case of XYZ Ltd (Sarclad Limited), had been thought also to be the maximum available discount under a DPA.</li> <li>Rolls-Royce has agreed to assist the relevant authorities in the investigation and prosecution of individuals involved.</li> <li>In an announcement to the market on 16 January 2017, Rolls-Royce further revealed that, in addition to the DPA with the SFO, it had entered into a DPA with the US DOJ and a Leniency Agreement with Brazil's Ministério Público Federal,</li> <li>See the <u>judgment approving the DPA</u>.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
					<p>Deferred Prosecution Agreement ("DPA") entered into by Rolls- Royce, Rolls-Royce Energy Systems Inc and the SFO.</p> <ul style="list-style-type: none"> <li>Under the terms of the DPA, Rolls-Royce will pay a penalty of £239,082,645, disgorge £258,170,000 in profits on the transactions and pay the SFO's full costs, amounting to £12,960,754.</li> <li>The company will also be required to complete a compliance programme and must continue to co-operate with the relevant authorities in all matters relating to the conduct alleged, including the investigation and prosecution of individuals.</li> <li>By 19 June 2017 Rolls-Royce had launched a complete overhaul of its compliance and due diligence systems. Disciplinary proceedings were conducted against 38 employees, of which 11 resigned during the disciplinary process, and 6 were dismissed.</li> </ul>	<ul style="list-style-type: none"> <li>Analysis is available: "<a href="#"><i>Rolls-Royce becomes third company to enter UK DPA</i></a>"</li> <li>Sir Brian Leveson QC stated at the Fraud Lawyers Association conference on 16 June 2017 that Rolls-Royce only avoided criminal prosecution by removing the responsible executives and drastically overhauling its compliance and due diligence procedures.</li> <li>On 07 January 2019, the SFO announced that it had dropped probes into some individuals (but not all) as part of a narrowing of its investigation.</li> <li>The Financial Reporting Council (FRC) has issued KPMG a £3.4 million fine for its failure to act after learning about Rolls-Royce's alleged bribery.</li> <li>The FRC has also fined KPMG partner Anthony Sykes £112,500 for his failure to act in his role.</li> </ul>

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					<ul style="list-style-type: none"> <li>On 22 February 2019 the SFO announced the closure of the Rolls-Royce case.</li> <li>Sentencing: <ul style="list-style-type: none"> <li>(i) Keith Barnett was fined \$250,000 and given three years' probation.</li> <li>(ii) Vitaly Leshkob, a technical adviser to a Kazakh pipeline deal, was fined \$500,000 and sentenced to 12 months in prison.</li> <li>(iii) James Finley was sentenced to two four-month prison terms, running concurrently and ordered to pay \$500,000.</li> </ul> </li> </ul>	
<b>2016</b>						
B Limited	UK (COPFS)	2007 - 2013	UK (Scotland)	<ul style="list-style-type: none"> <li>B Limited initiated an investigation in 2012 into two freight forward contracts entered into by one of its subsidiaries.</li> <li>The investigation revealed that one contract between an employee of the subsidiary and an employee of a customer company used an account for unauthorised personal expenses (amounting to £475,000). This was funded by</li> </ul>	<ul style="list-style-type: none"> <li>On 29 March 2016, under a civil settlement, the Civil Recovery Unit recovered £2.2 million (the value of the benefit derived by the company from the unlawful conduct).</li> </ul>	

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				<p>a dishonest inflation of invoices to the customer.</p> <ul style="list-style-type: none"> <li>The company also discovered a separate bribery offence, which occurred over several years as a result of a profit sharing arrangement with a director of the customer company. Profits on services provided to the customer were split in return for further orders placed with the company.</li> <li>B Limited self-reported to COPFS, and accepted failures to prevent bribery as well as breaches of Sections 1 and 7 of the Bribery Act 2010.</li> </ul>		
Unaoil (Oil)	UK (SFO)	2005-2011	UK, Iraq	<ul style="list-style-type: none"> <li>In March 2016, following a six-month investigation, Fairfax Media and The Huffington Post published reports, based on hundreds of thousands of leaked internal emails and documents, alleging that billions of dollars of government contracts were awarded as the direct result of bribes paid by Unaoil on behalf of firms including Rolls-Royce, Halliburton, Leighton Holdings, Samsung and Hyundai.</li> <li>On 19 July 2016, the SFO announced that it was conducting a criminal investigation into the activities of Unaoil, its officers, its employees and its agents in connection with suspected offences of bribery, corruption and money laundering.</li> </ul>	<ul style="list-style-type: none"> <li>On 16 November 2017, the SFO charged the following individuals in relation to alleged corruption within Unaoil between June 2005 and August 2011: <ul style="list-style-type: none"> <li>(i) Basil Al Jarah with offences of conspiracy to make corrupt payments. On 15 May 2018, the SFO brought two further counts of conspiracy to make corrupt payments against Mr Al Jarah, in relation to an oil pipeline contract for Leighton Contractors Singapore PTE Ltd.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>All offences relating to the conspiracy to make or receive corrupt payments have been charged pursuant to section 1 of the Criminal Law Act 1977 and section 1 of the Prevention of Corruption Act 1906.</li> <li>The SFO opened criminal proceedings against Unaoil Monaco SAM and Unaoil Ltd in June 2018 as part of its wider investigation. Both units have since been placed in liquidation.</li> <li>The SFO has opened three further investigations linked to Unaoil - ABB Ltd, KBR Inc. and Petrofac PLC. In Early August 2020 the investigations</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				<ul style="list-style-type: none"> <li>As the offences were allegedly committed in the UK, Ziad Akle (Unaoil's territory manager for Iraq) is a London resident, and Basil Al Jarah (Unaoil's Iraq partner) is a resident in Hull, the SFO is taking the lead on this investigation.</li> </ul>	<ul style="list-style-type: none"> <li>(ii) Ziad Akle with one offence of conspiracy to make corrupt payments. On 16 May 2018, the SFO brought one further count of conspiracy to make corrupt payments against Mr Akle, in relation to an oil pipeline contract for Leighton Contractors Singapore PTE Ltd.</li> <li>On 30 November 2017, the SFO charged two further individuals in relation to the investigation: <ul style="list-style-type: none"> <li>(i) Paul Bond with two offences of conspiracy to make corrupt payments. In February 2021, the SFO secured a conviction and Bond was sentenced to three and half years imprisonment.</li> <li>(ii) Stephen Whiteley with one offence of conspiracy to make corrupt payments.</li> </ul> </li> <li>The four individuals appeared briefly before London's Southwark Crown Court on 4</li> </ul>	<ul style="list-style-type: none"> <li>into KBR connected with Unaoil were closed.</li> <li>On 28 February 2018, Monaco rejected the SFO's request to extradite Saman Ahsani (former COO) following an "adverse opinion" from Monaco's Court of Appeal. The decision cannot be appealed. It has been reported that the SFO has decided to shelve the investigation into suspected bribery by Unaoil and its owners. It is understood that the arrest warrants against the company, the Chairman Ata Ahsani and his two sons, former chief executive Cyrus Ahsani and chief operating officer Saman Ahsani, have been withdrawn. The SFO has declined to comment on why the investigation has been dropped.</li> <li>In March 2019 Cyrus Ahsani (ex-CEO) and Saman Ahsani entered guilty pleas to conspiring to violate the Foreign Corrupt Practices Act in the US. They are both due to be sentenced in April 2020 in Houston federal court.</li> <li>The SFO's wider investigation into suspected misconduct by companies</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
					<p>January 2018, although no pleas were entered.</p> <ul style="list-style-type: none"> <li>The criminal trial against Mr Al Jarah, Mr Akle, Mr Bond and Mr Whiteley began in January 2020 and was expected to last four months. Mr Al Jarah, whilst listed as a co-conspirator on the indictment, pleaded guilty to the offences he was charged with before the trial started.</li> <li>On 13 July 2020, Mr Akle and Mr Whiteley, were convicted of conspiring to make corrupt payments to Iraqi government officials to win a lucrative oil infrastructure contract worth \$55 million. Former Iraq Ministry of Oil official, Mr Al Jarah, pleaded guilty to conspiring to make corrupt payments to secure contracts worth \$800m.</li> <li>In October 2020, Mr Al Jarah was sentenced to three years and four months' imprisonment. Mr Akle was sentenced on 24 July 2020 to five years in prison for conspiracy to bribe an Iraqi government official. Mr Whiteley was sentenced to three</li> </ul>	and individuals linked to Unaoil is still ongoing.

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
					<p>years in prison on 30 July 2020 for his “intended and actual” part in the bribery.</p> <ul style="list-style-type: none"> <li>• The jury was unable to reach a verdict in respect of Mr Bond. Mr Bond’s retrial began on 20 January 2021. Following his retrial, a jury found Mr Bond guilty on two counts of conspiracy to give corrupt payments. He has been sentenced to three and half years’ imprisonment.</li> <li>• On 17 June 2021, the SFO secured a confiscation order (£402,465.65) by consent against Basil Al Jarah. Al Jarah must pay within three months, or faces a further three years in prison.</li> <li>• On 03 November 2021, the SFO recovered criminal gains of almost £100,000 from Mr Whiteley.</li> <li>• In December 2021, the Court of Appeal quashed the Mr. Akle’s conviction due to issues with how the SFO managed the disclosure process.</li> </ul>	



Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
Alastair Baird and others (Property Development)	UK (Metropolitan Police)	2015	UK	<ul style="list-style-type: none"> <li>In August 2015, Barratt Developments plc ("Barratt") conducted an internal investigation into possible misconduct in the process for awarding and managing certain material and subcontract supply contracts in the London region.</li> <li>Barratt referred the matter to the Metropolitan Police, who, in April 2016, opened an investigation into a number of allegations of corruption relating to irregularities in the tendering process for contracts.</li> <li>Following Barratt's referral to the police, Alastair Baird (a regional managing director of Barratt's London division) and an unnamed former employee of Barratt were arrested on suspicion of bribery on 19 October 2016. On 08 November 2016, two further unnamed employees were arrested on suspicion of bribery.</li> </ul>	<ul style="list-style-type: none"> <li>In January 2017, three unnamed employees were suspended by Barratt as part of its internal investigation.</li> </ul>	<ul style="list-style-type: none"> <li>On 22 February 2017, Barratt confirmed that it continues to cooperate with the Metropolitan Police.</li> </ul>
F.H. Bertling Limited (Freight and Logistics)	UK (SFO)	2005-2006 2010-2013	UK, Angola	<u>Sonangol bribery:</u> <ul style="list-style-type: none"> <li>On 13 July 2016, the SFO charged F.H. Bertling Limited ("F.G. Bertling") and seven individuals in relation to the alleged bribing of an agent of Sonangol, the Angolan State Oil company, to allow F.H. Bertling to conduct its freight-forwarding business in Angola, pursuant to the Prevention of Corruption Act</li> </ul>	<u>Sonangol bribery:</u> <ul style="list-style-type: none"> <li>F.H. Bertling and the six former executives – Joerg Blumberg, Stephen Emler, Dirk Juergensen, Giuseppe Morreale, Ralf Petersen and Marc Schweiger – all pleaded guilty to the charges under the Prevention of Corruption Act 1906. Specifically, they admitted</li> </ul>	<ul style="list-style-type: none"> <li>The defendants in both the alleged Sonangol and Project Jasmine bribery cases have been charged under the UK's old corruption-fighting legislation, the Prevention of Corruption Act 1906.</li> <li>The SFO's criminal investigation into corruption at F.H. Bertling began in September 2014.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				<p>1906 and section 1 of the Criminal Law Act 1977.</p> <p><u>Project Jasmine bribery:</u></p> <ul style="list-style-type: none"> <li>In May 2017, the SFO also charged F.H. Bertling and six individuals in relation to £350,000 worth of alleged bribes paid to ConocoPhillips, a US oil and gas company, in conjunction with a North Sea oil exploration project codenamed Project Jasmine, in relation to the supply of freight-forwarding contracts between January 2010 and May 2013.</li> <li>The company and the individuals (Colin Bagwell, Robert McNally, Georgina Ayres, Giuseppe Morreale, Peter Smith and Stephen Emler) were all charged with one count of conspiracy to give or accept corrupt payments.</li> <li>Christopher Lane was also charged with an additional count of conspiracy to give or accept corrupt payments in breach of section 1 of the Prevention of Corruption Act 1906 and section 1 of the Criminal Law Act 1977.</li> </ul>	<p>to conspiring to make corrupt payments amounting to £250,000 to Sonangol to secure an \$18 million contract with BP's Angolan branch in 2005.</p> <ul style="list-style-type: none"> <li>On 21 September 2017, Peter Ferdinand was returned a not guilty verdict.</li> <li>On 20 October 2017, Judge Pedgen handed Joerg Blumberg, Dirk Juergensen and Mark Schweiger 20-month prison sentences suspended for two years, on the grounds that they made no personal gain and have a "realistic prospect of ...rehabilitation." Ralf Petersen also received the same, although he died in May 2017.</li> <li>See below for sentencing decision on Guiseppe Morreale and Stephen Emler.</li> </ul> <p><u>Project Jasmine bribery:</u></p> <ul style="list-style-type: none"> <li>Stephen Emler and Giuseppe Morreale pleaded guilty for their part in the corrupt scheme.</li> <li>Christopher Lane pleaded guilty to the additional bribery count involving overcharging. He was</li> </ul>	<ul style="list-style-type: none"> <li>In total, 13 individuals were charged as part of the SFO's case, with 9 convicted of one or more charges and 4 individuals acquitted.</li> <li>F.H. Bertling was a UK subsidiary of German freight-forwarder Bertling Group. It went into voluntary liquidation in 2018. Following this, it was severed from the Project Jasmine trial because consent from the Attorney General required to bring charges pursuant to the Prevention of Corruption Act 1906, was not granted. F.H. Bertling pleaded guilty to the bribery charges in the Sonangol bribery trial and was fined £850,000.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
					<p>handed a six-month prison sentence suspended for two years as well as electronically monitored for 28 days (instead of fined).</p> <ul style="list-style-type: none"> <li>Colin Bagwell was found guilty of conspiring with Christopher Lane in the overcharging scheme but was acquitted of bribery. He received a nine-month prison sentence suspended for two years and was fined £5,000.</li> <li>Peter Smith, Georgina Ayres and Robert McNally were acquitted of all charges.</li> </ul> <p><u>Persons implicated in both schemes:</u></p> <ul style="list-style-type: none"> <li>Giuseppe Morreale received a two-year suspended prison sentence and was fined £20,000.</li> <li>Stephen Emler was handed an 18-month prison sentence suspended for two years and was fined £15,000.</li> </ul>	
Braid Group (Holdings) Limited (Freight and Logistics)	UK (COPFS)	2012	UK (Scotland)	<ul style="list-style-type: none"> <li>Braid Group (Holdings) Limited (2Braid Group") self-reported suspected breaches of the Bribery Act 2010 in relation to freight forwarding contracts.</li> </ul>	<ul style="list-style-type: none"> <li>An agreed civil settlement between Braid Group and the Crown Office for a total of £2.2 million.</li> </ul>	<ul style="list-style-type: none"> <li>This is the first time that a corporate has been found to have breached section 1 of the Bribery Act 2010.</li> <li>As the breach was self-reported and admitted by Braid Group, and the</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				<ul style="list-style-type: none"> <li>Further issues were discovered as a result of the investigation regarding a profit sharing arrangement with a director of a customer.</li> <li>Braid Group accepted it had committed offences under sections 1 and 7 of the Bribery Act 2010.</li> </ul>	<ul style="list-style-type: none"> <li>The Braid Group has confirmed that all employees connected to the activities have been dismissed.</li> </ul>	matter was resolved by means of a civil settlement, it is unclear exactly how the offence was made out.
<b>2015</b>						
Soma Oil & Gas Limited (Oil and Gas)	UK (SFO)	2013-2015	UK, Somalia	<ul style="list-style-type: none"> <li>On 25 June 2015, the SFO announced that it was investigating the payment of \$580,000 by a UK-based oil and gas exploration company to officials in the Somali government's Ministry of Petroleum.</li> <li>The payments were characterised as "capacity building payments" as Soma Oil &amp; Gas Limited ("Soma") sought to open new fields off the coast of Somalia.</li> <li>A report for the UN Council by the UN Somalia and Eritrea Monitoring Group alleged that the payments were "a likely part of a quid pro quo arrangement" whereby, in exchange for payments to public officials, Soma received preferential treatment and commercial advantages.</li> </ul>	<ul style="list-style-type: none"> <li>On 16 August 2016, the SFO informed Soma that there was insufficient evidence to continue its investigation into the capacity building payments. However, the SFO announced that it would continue to investigate Soma in relation to additional allegations of bribery.</li> <li>On 14 December 2016, the SFO closed its investigation into Soma, concluding that there was insufficient evidence to provide a realistic prospect of conviction.</li> </ul>	<ul style="list-style-type: none"> <li>On 10 August 2016, Soma applied for judicial review of the SFO's decision not to disclose the avenues of its investigation and sought, alternatively, to terminate the investigation.</li> <li>On 12 October 2016, the High Court refused to grant permission to proceed with Soma's application.</li> <li>The High Court's judgment confirmed that the SFO has dropped its investigation into the capacity building payments but continues to investigate additional strands.</li> <li>See <u><a href="#">R (on the application of Soma Oil and Gas Limited) v Director of the Serious Fraud Office</a></u>.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
Sweett Group PLC (Quantity Surveyor)	UK (SFO)	2012-2015	U.A.E.	<ul style="list-style-type: none"> <li>Sweett Group PLC ("Sweett Group") was charged with failure to prevent bribery under section 7, Bribery Act 2010.</li> <li>The charge arose when a subsidiary of Sweett Group, Cyril Sweett International Limited, paid £680,000 in bribes to Khaled Al Badie, vice chairman of the board of Al Ain Ahlia Insurance Company, to secure a £1.6 million project management and cost consulting contract in relation to the building of a hotel in Dubai.</li> <li>The bribes were paid under a "Hospitality Development Consulting Services" agreement with North Property Management, a company owned by Khaled Al Badie. No services were performed under this agreement.</li> </ul>	<ul style="list-style-type: none"> <li>Sweett Group pleaded guilty on 18 December 2015 to the charge of failing to prevent bribery.</li> <li>On 19 February 2016, Sweett Group was sentenced to pay £2.25 million in total (£1.4 million in fine, £851,152.23 in confiscation).</li> <li>£95,031.97 in costs was awarded to the SFO.</li> <li>In sentencing the company, Judge Martin Beddoe noted that "corrupt payments were made under the corrupt agreement for no less than 18 months" and that the company deliberately tried to mislead the SFO after it opened an investigation.</li> <li>On 21 December 2016, Richard Kingston (a former Managing Director of Sweett Group based in the Middle East) was convicted of two destruction of evidence offences, contrary to section 2(16) of the Criminal Justice Act 1987. He was sentenced to 12 months imprisonment on each count, to run concurrently.</li> </ul>	<ul style="list-style-type: none"> <li>Sweett Group is the first company to be convicted under the Bribery Act 2010.</li> <li>Although Sweett Group agreed with the SFO that it would plead guilty to the offence, it was not offered a DPA as it had not fully co-operated with the SFO during the course of its investigation.</li> <li>The SFO's investigation into the individuals involved continues.</li> <li>On 17 August 2016, Sweett Group appeared before a disciplinary panel held by the Royal Institute of Chartered Surveyors. The panel imposed a fine of £125,000 and ordered Sweett Group to pay costs of £4,590.</li> <li>On 21 December 2016, Richard Kingston (a former Managing Director of Sweett Group based in the Middle East) was convicted of two destruction of evidence offences, contrary to section 2(16) of the Criminal Justice Act 1987. He was sentenced to 12 months imprisonment on each count, to run concurrently.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
						<ul style="list-style-type: none"> <li>Analysis is available: "<u>Two cases under the Bribery Act: Guilty plea of Deferred Prosecution?</u>"</li> </ul>
Innovia Securrency PTY Ltd (Procurement)	UK and Australia (SFO, Australian Federal Police)	2007-2009	UK, Australia	<ul style="list-style-type: none"> <li>Peter Chapman, the former director of business development for Africa at bank-note technology producer Innovia Securrency PTY Ltd ("Securrency"), has been charged with allegedly making six corrupt payments totalling £160,000 to a Nigerian official between January and March 2009 contrary to the Prevention of Corruption Act 1906.</li> <li>The bribes, which were allegedly paid through a Seychelles-incorporated company to accounts and companies controlled by the Nigerian official, were made to secure orders to supply polymer substrate, commonly used in bank notes.</li> <li>The contracts were worth a total value of \$38 million to Securrency.</li> </ul>	<ul style="list-style-type: none"> <li>Peter Chapman pleaded not guilty to all six charges.</li> <li>The defence did not dispute that the payments were made, but claimed they were repayments for money lent to Chapman by the Nigerian official to cover business expenses incurred while working for Securrency.</li> <li>Peter Chapman was found guilty of four charges of making corrupt payments to a foreign official. He was cleared of the other two charges.</li> <li>He was sentenced on 12 May 2016 to two years and six months in prison, but, as he had served almost half of his sentence in Brazilian and English custody, qualified for immediate release.</li> <li>His conviction was upheld by the Court of Appeal on 31 March 2017.</li> </ul>	<ul style="list-style-type: none"> <li>The SFO is said to have taken an interest in the case because, at the time of the alleged corruption, Securrency was half-owned by Innovia Films, a manufacturing firm based in Cumbria. The other half of the company is reported to have been owned by Australia's central bank.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
					<ul style="list-style-type: none"> <li>Southwark Crown Court heard on 15 January 2018 that the SFO sought to claw back £1 million in criminal profits from Securrency under the Proceeds of Crime Act 2002.</li> <li>Chapman, however, argued that the profit involved was closer to £92,000, which was rejected by the SFO.</li> <li>On 5 September 2019, Chapman was ordered to pay a confiscation order of £441,944.38.</li> <li>Former Securrency sales executive, Clifford Gerathy, pleaded guilty to charges of false accounting. Gerathy falsely classified a \$79,502 payment in 2006 in order to pay a fixer who was helping the Reserve Bank of Australia, which owned a 50% stake in Securrency at the time, win a contract in Malaysia.</li> </ul>	
ICBC Standard Bank (formerly Standard Bank Plc) (Financial Services)	UK	2013	Tanzania	<ul style="list-style-type: none"> <li>ICBC Standard Bank plc ("ICBC Standard Bank") was charged with failure to prevent bribery (section 7, Bribery Act 2010).</li> <li>The charges arose from a capital raising project for the Government of Tanzania, for</li> </ul>	<ul style="list-style-type: none"> <li>The SFO and ICBC Standard Bank entered into a DPA.</li> <li>Under the DPA, ICBC Standard Bank had to:</li> </ul>	<ul style="list-style-type: none"> <li>The DPA, approved by the High Court on 30 November 2015, was the first in the UK since the power became available to the SFO in February 2014.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				<p>which an increased fee was paid, to allow \$6 million to be paid to a local agent, Enterprise Growth Market Advisors. This company performed no actual services and was a vehicle for diverting bribes to certain government officials involved in the deal.</p> <ul style="list-style-type: none"> <li>Two employees of Stanbic Bank Tanzania Ltd (a local subsidiary of ICBC Standard Bank) arranged the transaction. However, as it secured a role for ICBC Standard Bank as well, they were performing services for the English company and it was therefore liable under the Bribery Act.</li> </ul>	<ul style="list-style-type: none"> <li>(i) co-operate with law enforcement agencies in the prosecution of individuals;</li> <li>(ii) pay \$6 million in compensation to the government of Tanzania, plus \$1.04 million in interest;</li> <li>(iii) pay \$8.4 million disgorgement of profits;</li> <li>(iv) pay a penalty of \$16.8 million;</li> <li>(v) pay SFO costs of £330,000; and</li> <li>(vi) commission a report into its current anti-bribery policies and procedures.</li> </ul>	<ul style="list-style-type: none"> <li>The DPA means that ICBC Standard Bank will not be convicted of the charges, as long as it complies with the terms of the DPA during its 3 year duration.</li> <li>A DPA will only be granted where “fair, reasonable and proportionate”. Determining factors in this case were: <ul style="list-style-type: none"> <li>(i) the speed with which the matter was self-reported to the NCA and SFO;</li> <li>(ii) the SFO might not otherwise have uncovered the bribery;</li> <li>(iii) the level of co-operation with the SFO investigation;</li> <li>(iv) ownership and senior management of the bank have since changed; and</li> <li>(v) the bank had anti-bribery policies and procedures in place which have since been improved significantly.</li> </ul> </li> <li>The DPA expired on 30 November 2018.</li> <li>The SFO sent formal notification to the court stating that ICBC Standard Bank had fully complied with its terms.</li> </ul>



Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
						<ul style="list-style-type: none"> <li>Accordingly, the charges against ICBC Standard Bank have been voided.</li> </ul>
Brand-Rex Limited (Engineering)	Scotland (Crown Office and The Civil Recovery Unit)	2008–2012	Scotland	<ul style="list-style-type: none"> <li>Brand-Rex operated a lawful incentive scheme for its UK installers; if they hit sales targets they would be eligible for rewards, including foreign holidays.</li> <li>One of the installers unlawfully passed the benefits of this scheme (travel tickets) on to its client, an end-user of Brand-Rex cabling products. That individual was in a position to influence decisions to use Brand-Rex products.</li> <li>After uncovering the issues during an internal review, Brand-Rex conducted an extensive investigation, and self-reported its failure to prevent bribery pursuant to section 7 of the Bribery Act 2010.</li> </ul>	<ul style="list-style-type: none"> <li>The case was deemed suitable for civil recovery rather than criminal prosecution.</li> <li>Brand-Rex was ordered to pay a £212,800 civil recovery order under the Proceeds of Crime Act 2002, the amount of the gross profit generated as a result of the misuse of the incentive scheme.</li> </ul>	<ul style="list-style-type: none"> <li>First civil settlement for failure to prevent bribery under section 7 of the Bribery Act 2010.</li> </ul>
<b>2014</b>						
International Tubular Services Limited	Scotland (COPFS)	2012	UK, Kazakhstan	<ul style="list-style-type: none"> <li>International Tubular Services Limited had benefitted from a corrupt payment (\$17,000) made by a former employee based in Kazakhstan to secure additional work from a customer in Kazakhstan.</li> <li>In November 2013, the corrupt payment was reported to the COPFS under the self-reporting initiative; the bribery and corruption</li> </ul>	<ul style="list-style-type: none"> <li>The Civil Recovery Unit recovered £172,000 (the total profit made under the corrupt contract in Kazakhstan).</li> </ul>	<ul style="list-style-type: none"> <li>Following acquisition of International Tubular Services Limited, Parker Drilling Company took steps to implement comprehensive anti-bribery policies and training to prevent further unlawful conduct.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				was discovered when the company was sold to Parker Drilling Company.		
Alstom Network UK and Alstom Power Ltd (Engineering)	UK (SFO) US (DOJ)	2000-2006	India, Poland, Tunisia, Lithuania, Hungary, UK, Saudi Arabia, Indonesia, Egypt, Bahamas and Taiwan	<ul style="list-style-type: none"> <li>The SFO is conducting a criminal investigation into the alleged payment of bribes by British companies within the Alstom SA.</li> </ul> <p><u>India, Poland and Tunisia bribery:</u></p> <ul style="list-style-type: none"> <li>In July 2014, charges were brought against Alstom Network UK Ltd ("Alstom Network UK"), in respect of £6 million in alleged bribes, paid to secure transport contracts in India, Poland and Tunisia. Company executives Robert John Hallett and Graham Denis Hill were charged with the same offences.</li> </ul> <p><u>Lithuania bribery:</u></p> <ul style="list-style-type: none"> <li>In December 2014, the SFO brought charges against Alstom Power Ltd ("Alstom Power"), Nicholas Paul Reynolds, Göran Wikström and Johanes Venskus for allegedly bribing officials at a state-controlled Lithuanian energy company.</li> </ul> <p>Hungary bribery:</p> <ul style="list-style-type: none"> <li>In May 2015, further charges were brought by the SFO against Alstom Network, Michael John Anderson and Jean-Daniel Lainé, for the alleged payment of bribes to win contracts for the supply of trains to the</li> </ul>	<p><u>India, Poland and Tunisia bribery:</u></p> <ul style="list-style-type: none"> <li>In April 2018, Alstom Network was convicted of one count of conspiracy to win contracts in Tunisia.</li> <li>On 25 November 2019 Alstom Network was ordered to pay a fine of £15 million and legal costs of £1.4 million.</li> <li>Graham Hill and Robert Hallett denied being involved with the alleged corrupt activity in India and Poland and were acquitted.</li> <li>Alstom Network submitted a renewed application to the High Court in London on 04 July 2019, appealing the conviction on the grounds of abuse of process as the company's "directing minds", Bruno Kaelin, Head of Compliance, and Jean- Daniel Laine, Director, were not present during the trial.</li> <li>The Court of Appeal dismissed the appeal.</li> </ul>	<ul style="list-style-type: none"> <li>A total of eight individuals and two companies have been charged with corruption offences in three criminal trials under the Prevention of Corruption Act 1906 and offences of conspiracy to corrupt under the Criminal Law Act 1977.</li> <li>The charges were presented by the SFO following a nearly seven- year investigation which started when the attorney general of Switzerland provided information about the Alstom Group and the Alstom Network.</li> <li>In 2014, Alstom SA pleaded guilty to US bribery charges and paid a \$772m criminal penalty, one of the biggest FCPA settlements on record.</li> <li>A US court has recently held that the DOJ cannot prosecute Lawrence Hoskins, a UK national and former vice president of Alstom SA residing in France, under a conspiracy theory for the alleged FCPA violations but could prosecute him under a theory that he acted as an agent of a US subsidiary of Alstom SA that had engaged in bribery.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				Budapest Metro. On 29 March 2016, Terence Watson, the managing director of Alstom Transport UK & Ireland and the Alstom Country President for the UK, was also charged in relation to these alleged bribes.	<p><u>Lithuania bribery:</u></p> <ul style="list-style-type: none"> <li>Nicholas Reynolds was convicted for conspiring to make or receive corrupt payments in relation to the Lithuanian deal. He was sentenced to four and a half years' imprisonment and ordered to pay £50,000 in costs.</li> <li>Mr Reynolds' appeal was rejected by the Court of Appeal in December 2019.</li> <li>Göran Wikström pleaded guilty in relation to the same charge and was sentenced to two years and seven months' imprisonment and ordered to pay £40,000 in costs.</li> <li>Johanes Venskus was sentenced to three years and a half years' imprisonment and ordered to pay a £410,786 confiscation order.</li> <li>Alstom Power entered a guilty plea and was ordered to pay a total of £18,038,000 which included: <ul style="list-style-type: none"> <li>(i) a fine of £6,375,000;</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The US trial against Hoskins commenced in September 2019 and on 6 March 2020, he was sentenced to 15 months' imprisonment for turning "a blind eye" to corruption at Alstom SA.</li> <li>On 24 March 2020, Hoskins filed a notice of appeal. The notice doesn't indicate whether Hoskins is appealing his conviction, his sentence or both.</li> <li>On 21 April 2020, a bribery probe against the company has been dropped in Lithuania over a lack of evidence.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
					<p>(ii) compensation to the Lithuanian £10,963,000; and</p> <p>(iii) prosecution costs of £700,000.</p> <p><u>Hungary bribery:</u></p> <ul style="list-style-type: none"> <li>Alstom Network and the three senior executives pleaded not guilty in relation to the alleged corruption and were acquitted by a jury in November 2018.</li> </ul>	
<b>2013</b>						
Thomas Gunn Navigation Systems Ltd	UK (COPFS)	2003 - 2012	UK	<ul style="list-style-type: none"> <li>Staff at Thomas Gunn Navigation systems Ltd paid £30,000 in bribes to executives at a London-based shipping firm, in return for the award of contracts worth £138,000.</li> <li>COPFS conducted a full investigation into Thomas Gunn Navigation Systems Ltd following an internal investigation and self-report by the Company's new board of directors.</li> <li>Thomas Gunn Navigation Systems Ltd.'s managing director – Thomas Gunn—was separately prosecuted for his involvement.</li> </ul>	<ul style="list-style-type: none"> <li>Thomas Gunn Navigation Systems Ltd entered into a settlement with the Civil Recovery Unit for the value of the corruptly obtained contracts (£138,000)</li> <li>Thomas Gunn pled guilty to two charges of conspiracy to make corrupt payments contrary to the Prevention of Corruption Act 1906 and the Bribery Act 2010. He community payback order.</li> </ul>	

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
Serco Geografix Limited (Public services, consumer industries)	UK (SFO)	2010-2013	UK	<ul style="list-style-type: none"> <li>The SFO has been running an investigation into fraud and false accounting related to the electronic tagging of prisoners in a Ministry of Justice ("MoJ") prisons contract.</li> <li>Serco Geografix Limited ("Serco Geografix") was accused of three offences of fraud and two of false accounting arising from a scheme to dishonestly mislead the MoJ as to the true extent of the profits being made between 2010 and 2013 by Serco Geografix's parent company, Serco Group plc ("Serco Group")</li> <li>Nicholas Woods and Simon Marshall have been charged with fraud by false representation and false accounting in relation to representations made to the Ministry of Justice between 2011 and 2013. Nicholas Woods is additionally charged with false accounting in relation to the 2011 statutory accounts of Serco Geografix Ltd.</li> <li>Serco Geografix reported these offences to the SFO in November 2013. On 19 February 2020, both individuals pleaded not guilty to the charges.</li> </ul>	<ul style="list-style-type: none"> <li>Under the terms of the three-year <u>DPA</u>, Serco agreed to pay a fine of £19.2 million, plus SFO investigation costs of £3.7 million.</li> <li>Serco Geografix was given a 50 percent discount on its fine for self-reporting the issues to the SFO, and for its co-operation with the prosecutor.</li> <li>Serco Group also agreed an Undertaking in which Serco Group assumes certain obligations including ongoing cooperation with the SFO and further strengthening of its group-wide ethics and compliance functions, as well as annual reporting on its group-wide assurance programme.</li> <li>Serco Geografix no longer faces criminal charges following the agreement.</li> <li>On 26 April 2021, the jury was directed to return verdicts of not guilty as the SFO offered no evidence against Nicholas Woods or Simon Marshall.</li> </ul>	<ul style="list-style-type: none"> <li>Serco Group paid the Ministry of Justice £70 million in a civil settlement in December 2013.</li> <li>Deloitte has been fined £4.2 million by the UK Financial Reporting Council for its audit failings.</li> <li>The SFO have charged two directors in relation to the fraud and false accounting. Both have pleaded not guilty to the charges.</li> <li>It was announced on 25 January 2020 that Serco Group shareholders had issued a claim for damages in relation to the fraud. In June 2024 a settlement was reached for an undisclosed amount.</li> </ul>

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Sarclad Limited	UK (SFO)	2004-2012	Russia, India	<ul style="list-style-type: none"> <li>The SFO has brought proceedings against three individuals for making “under the table” payments to agents in 27 “corrupt” contracts agreed with companies across Asia.</li> <li>It is the SFO’s case that in 2005, Sarclad Limited (“Sarclad”) struck a deal with a Russian steel mill for £180,000 and agreed a 10% commission with its agent and paid a further 5% to an official working in the import department at a Russian steel mill.</li> <li>Michael Sorby (founder), Adrian Leek and David Leek (former senior sales executives), each face one count of conspiring to corrupt, and one count of conspiring to bribe. They were charged on 25 February 2016.</li> <li>The individuals deny the charges.</li> </ul>	<ul style="list-style-type: none"> <li>Following a 9-week trial that commenced in May 2019, all three individuals were found not guilty of bribery.</li> </ul>	<ul style="list-style-type: none"> <li>The failed trial cost the UK fraud office more than £4 million.</li> <li>Sarclad is the company that was anonymized as “XYZ” in the UK’s second-ever deferred prosecution agreement. The DPA expired in July 2019. The SFO has agreed to not seek the £648,000 costs of the DPA.</li> </ul>
Alandale Rail Limited, Innocent Obiekwe, John Zayya, William Waring and Kevin McKee (Construction and Procurement)	UK (British Transport Police and the CPS)	2010	UK	<ul style="list-style-type: none"> <li>In 2013, the British Transport Police’s fraud squad opened an investigation into corruption surrounding Alandale Rail Limited’s (“Alandale Rail”) role in the upgrade of Farringdon rail station and associated awards of Crossrail contracts.</li> <li>The allegations focused on Innocent Obiekwe, a senior manager at CoLOR (a Costain Laing O’Rourke joint venture) responsible for health and safety at Farringdon rail station.</li> </ul>	<ul style="list-style-type: none"> <li>Each of the defendants were sentenced as per the below on 24 July 2017:               <ul style="list-style-type: none"> <li>(i) Alandale Rail (now Alandale Track and Civils Limited) was fined £25,000.</li> <li>(ii) Innocent Obiekwe was sentenced to two years’ imprisonment and</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The British Transport Police’s investigation began after a whistleblower reported the allegations against Alandale Rail.</li> <li>In addition to the corrupt payments, the defendants were found guilty of taking part in a scheme to defraud Costain and Laing O’Rourke by claiming payments for “ghost workers” and for work that was never undertaken.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				<ul style="list-style-type: none"> <li>During 2010, Alandale Rail, through the agency of John Zayya and Kevin McKee, made corrupt payments to Mr Obiekwe in order to secure confidential information during a procurement process to supply additional Safety Critical Staff.</li> <li>The initial value of the contract awarded was £2.1 million but rose to £5.2 million.</li> <li>Corrupt payments continued to be made through William Waring in 2010 to ensure continued favour to Alandale Rail.</li> <li>In total, the investigation identified corrupt payments in excess of £140,000 to Mr Obiekwe.</li> </ul>	<p>disqualified from being a director for eight years.</p> <p>(iii) John Zayya was sentenced to two years' imprisonment and disqualified from being a director for eight years.</p> <p>(iv) William Waring was sentenced to two years' imprisonment on two counts to run concurrently. The first count was money laundering, the second count was corruption. Mr Waring has also been disqualified from being a director for eight years.</p> <p>(v) Kevin McKee was sentenced to 12 months' imprisonment on five counts to run concurrently and disqualified from being a director for eight years.</p>	<ul style="list-style-type: none"> <li>Safety Critical Staff are specially trained and responsible for the safety of operatives working on the railway infrastructure, including stations and tracks. The role is tightly regulated.</li> </ul>
Smith & Ouzman Limited, Christopher Smith, Nick Smith, Tim Forrester, Abdirahman Omar (Printing)	UK (SFO)	2006-2010	UK, Mauritania, Ghana, Somaliland and Kenya	<ul style="list-style-type: none"> <li>Smith &amp; Ouzman Limited ("S&amp;O") UK based printing company (specialising in security documents such as ballot papers), two of its directors, an employee and an agent have all been convicted of offences of corruptly agreeing to make payments totalling nearly</li> </ul>	<ul style="list-style-type: none"> <li>Christopher Smith (aged 72) was sentenced to 18 months' imprisonment, suspended for two years, for two counts of corruptly agreeing to make payments. He was also ordered</li> </ul>	<ul style="list-style-type: none"> <li>This case is the SFO's first conviction of a corporate for foreign bribery, following a contested trial.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				£500,000, which were used to influence the award of business contracts to the company.	<p>to carry out 250 hours of unpaid work and was given a 3 month curfew. He has been disqualified from being a director for 6 years. On 08 January 2016 Christopher Smith was ordered to pay £4,500 in confiscation within seven days and costs of £75,000 within three months.</p> <ul style="list-style-type: none"> <li>Nicholas Smith (aged 43) was sentenced to three years' imprisonment for three counts of corruptly agreeing to make payments. He has also been disqualified from being a director for 6 years. On 08 January 2016 a confiscation order of £18,693 was imposed on Nicholas Smith, payable within eight weeks. He was also ordered to pay costs of £75,000 within nine months.</li> <li>In January 2016, S&amp;O was ordered to pay a total of £2.2 million (£1,316,799 in fine, £881,158 in confiscation) for three counts of corruptly agreeing to make payments, contrary to section 1(1) of the Prevention of Corruption Act 1906.</li> </ul>	<ul style="list-style-type: none"> <li>The Court applied the Sentencing Council Guidelines in deciding the sentence.</li> <li>In sentencing Christopher and Nicholas Smith, Judge Higgins emphasised the potentially serious consequences of the defendants' actions, noting that <i>"People in these countries are the victims. Integrity and confidence in electoral systems are undermined and the results of this could be catastrophic. It could lead to violence and loss of life."</i></li> <li>Judge Higgins acknowledged the good character of the defendants, noting that neither sought personal gain from the offences, however, he concluded that the offending could not be <i>"mitigated through altruistic motive."</i></li> <li>S&amp;O was found to have made corrupt payments totalling £395,074.</li> </ul>



Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
					<ul style="list-style-type: none"> <li>The other defendants were acquitted.</li> </ul>	
Besso Limited (Insurance)	UK (FCA)	2005-2011	UK and overseas jurisdictions	<ul style="list-style-type: none"> <li>Besso Limited ("Besso") failed to acquire the information and approvals required to assess the risks posed by making third party commission sharing payments.</li> <li>Prior to November 2009, Besso commenced business relationships with third parties without involving their Compliance function and with no assessment of country, third party or corruption risk.</li> <li>After 2009, although Besso introduced enhanced measures, it failed to implement them consistently or consider the risks adequately.</li> </ul>	<ul style="list-style-type: none"> <li>The FCA imposed a fine of £315,000 for failing to have and maintain effective systems and controls for countering the risks of bribery and corruption associated with third party commission sharing agreements.</li> </ul>	<ul style="list-style-type: none"> <li>The FCA emphasised that they did not find evidence to suggest that the conduct was deliberate or reckless and that the firm did increase its efforts to address risk, but that sufficient additional steps were not taken on a timely basis.</li> <li>The FCA did not suggest that bribery had in fact taken place – the issue was the failure to address bribery risk through effective systems and controls.</li> <li>Besso agreed a settlement at an early stage and therefore qualified for a 30% discount, without which a £450,000 penalty would have been imposed.</li> <li>See the FCA's <a href="#">Final Notice</a>.</li> </ul>
JLT Specialty Limited (Insurance)	UK (FCA)	2009-2012	UK and overseas jurisdictions	<ul style="list-style-type: none"> <li>JLT Specialty Limited ("JLTSL") entered into relationships with overseas partners who were retained to help JLTSL. During this period, JLTSL paid more than £11.7 million to overseas partners.</li> <li>JLTSL failed to take adequate steps to assess whether introducers were connected with the clients it introduced and/or public</li> </ul>	<ul style="list-style-type: none"> <li>The FCA imposed a fine of £1.8 million for failing to have in place appropriate checks and controls to guard against the risk of bribery or corruption in connection with payments made to overseas third parties.</li> </ul>	<ul style="list-style-type: none"> <li>The FCA re-emphasised that although it does not prosecute for breaches of the Bribery Act 2010, it expects bribery and corruption risks to be appropriately addressed by firms.</li> <li>See the FCA's <a href="#">Final Notice</a>.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				officials. JLTSL also failed to adequately implement its own anti-bribery and corruption policies.		
<b>2012</b>						
Abbot Group Limited	UK (COPFS)	2007	UK Private	<ul style="list-style-type: none"> <li>An overseas tax authority made in enquiries in May 2011; Abbot Group Limited instructed a firm of solicitors and accounts to conduct an internal investigation which resulted in the discovery of the corrupt payments.</li> <li>Abbot Group Limited entered into a civil settlement under the self-reporting initiative (introduced in 2011).</li> </ul>	<ul style="list-style-type: none"> <li>Abbot Group Limited accepted it had benefited from unlawful conduct (corrupt payments made in connection with a contract entered into by an overseas subsidiary and an overseas oil and gas company).</li> <li>The Civil Recovery Unit recovered £5.6 million under the Proceeds of Crime legislation.</li> </ul>	
Paul Jacobs, Bharat Sodha, Nidhi Vyas, Trevor Bruce (Oil and Gas)	UK (SFO)	2008-2009	Nigeria	<ul style="list-style-type: none"> <li>It is alleged that employees or agents of Swift Technical Energy Solutions Ltd ("Swift"), a Nigerian subsidiary of the Swift Group of companies, paid bribes to tax officials to avoid, reduce or delay paying tax on behalf of workers placed by Swift. The charges relate to payments said to have been made to agents of public internal revenue bodies in Nigeria.</li> </ul>	<ul style="list-style-type: none"> <li>All of the defendants were found not guilty on 02 June 2015. The jury was unable to reach a verdict on one count against Mr Bruce and so a verdict of not guilty was entered.</li> <li>The prosecution sought a nolle prosequi in respect of Mr Jacobs on grounds of his ill health, which was granted by the Attorney General on 27 January 2015.</li> </ul>	

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
Paul Jennings David Turner, Dennis Kerrison, and Miltiades Papachristos (Chemicals)	UK (SFO)	1999-2007	Indonesia, Iraq	<ul style="list-style-type: none"> <li>Four former directors of Innospec Ltd ("Innospec") were charged with conspiring to bribe officials in Indonesia and Iraq, more than a year after the company was sentenced for related corruption offences (see details below).</li> <li>Mr Jennings was also charged with conspiracy to corrupt Iraqi public officials and other agents of the Iraqi government in relation to payments made to ensure that tests conducted by or on behalf of the Iraqi government concluded with an unfavourable assessment of a competitor's product.</li> <li>Mr Jennings and Mr Turner pleaded guilty. Mr Papachristos and Mr Kerrison entered not guilty pleas.</li> </ul>	<ul style="list-style-type: none"> <li>Mr Kerrison and Mr Papachristos were found guilty and were sentenced to three years and 18 months' imprisonment respectively.</li> <li>Mr Jennings was found guilty and sentenced to two years' imprisonment, and ordered to pay £5,000 in prosecution costs.</li> <li>Dr Turner was found guilty and was given a 16 month suspended sentence and ordered to undertake 300 hours unpaid work. He was ordered to pay £10,000 in prosecution costs.</li> </ul>	<ul style="list-style-type: none"> <li>Mr Jennings has already agreed to pay \$230,000 to the U.S. SEC without admitting or denying the allegations that he had authorised the company to pay bribes.</li> <li>In September 2011, a follow-on civil claim brought against Innospec in the US by Newmarket, a market rival, was settled for \$45 million.</li> <li>A follow-on competitor compensation claim for \$40 million was brought against Innospec by Jalal Al-Gaood and Future Agencies Company Limited. This claim was dismissed by the High Court on 08 October 2014. See the judgment <a href="#">here</a>.</li> <li>Notable in the case was the disparity in sentencing between Jennings and Turner, who pleaded guilty, and Kerrison and Papachristos, who fought the charges. HHJ Goymer referred in his judgment to the court's desire to encourage cooperation with investigating authorities, which had particular effect in the leniency afforded to Dr Turner, who gave evidence against the other defendants.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
Oxford Publishing Limited (Retail)	UK (SFO)	2007-2010	Tanzania, Kenya	<ul style="list-style-type: none"> <li>Oxford Publishing Limited ("OPL") voluntarily reported concerns of bribery and corruption in relation to contracts arising from tenders which its Kenyan and Tanzanian subsidiaries entered into.</li> </ul>	<ul style="list-style-type: none"> <li>A civil recovery order to recover the proceeds of the unlawful conduct was pursued in place of criminal sanctions.</li> <li>OPL was ordered by the High Court to pay £1,895,435 as settlement for the unlawful conduct.</li> <li>In addition OPL voluntarily offered to contribute £2,000,000 to not-for-profit organisations for educational purposes in sub-Saharan Africa.</li> </ul>	<ul style="list-style-type: none"> <li>The costs of the investigation were met by OPL.</li> <li>OPL agreed to introduce enhanced compliance procedures to reduce the risk of recurrence. These will be reviewed by an independent monitor who will report to the SFO and the World Bank.</li> <li>The subsidiaries involved will be subject to parallel World Bank procedures and have been debarred from future World Bank funded tenders for three years following OPL's acknowledgment of the misconduct.</li> <li>The Consent Order and Claim have been made public.</li> </ul>
John Maylam, David Baxter, Andrew Behagg (Retail)	UK (City of London Police)	2005 - 2007	UK	<ul style="list-style-type: none"> <li>Mr Baxter and Mr Behagg, two directors of potato supplier Greenvale, provided Sainsbury's potato buyer Mr Maylam with cash, gifts and lavish hospitality in return for lucrative contracts worth £40 million.</li> <li>£4.9 million was paid to Mr Maylam in cash, together with lavish entertainment worth £1 million between 2005 - 2007.</li> </ul>	<ul style="list-style-type: none"> <li>Mr Maylam was jailed for four years for corruption and acquiring criminal property.</li> <li>Mr Baxter was jailed for 30 months and Mr Behagg was jailed for 3 years.</li> </ul>	<ul style="list-style-type: none"> <li>It is estimated that Sainsbury's was overcharged by £8.7 million as a consequence of entering into the potato contracts.</li> <li>Mr Maylam incurred an average of £20,000 a month in expenses, dining in expensive London eateries such as Claridges and The Dorchester. He also enjoyed all-expenses-paid trips to Monaco and St Tropez.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
Andrew Rybak, Ronald Saunders, Philip Hammond, Barry Smith and Graham Marchment (Oil and Gas)	UK (SFO, City of London Police)	2001 - 2009	Iran, Egypt, Russia, Singapore and Abu Dhabi	<ul style="list-style-type: none"> <li>Confidential information was corruptly supplied to bidders by companies who were acting as procurement agents for oil and gas projects.</li> <li>The defendants had access to inside information which they passed on to targeted bidding companies who either made, or agreed to make, corrupt payments for this information.</li> <li>Disguised as 'consultancy services', the illicit payments were shared out amongst the co-conspirators.</li> </ul>	<ul style="list-style-type: none"> <li>Rybak was sentenced to five years' imprisonment on each count, to be served concurrently and disqualification from acting as company director for 10 years.</li> <li>Saunders was sentenced to three years and six months' imprisonment on each count, to be served concurrently.</li> <li>Hammond was sentenced to three years imprisonment' on each count, to be served concurrently and disqualification from acting as company director for 10 years.</li> <li>Smith was sentenced to 12 months' imprisonment, suspended for a period of 18 months and 300 hours of unpaid work.</li> <li>Marchment was sentenced to two and a half years' imprisonment on each count, to be served concurrently.</li> </ul>	<ul style="list-style-type: none"> <li>A sixth defendant, Robert Storey, was tried in relation to the Abu Dhabi project only but the jury could not reach a verdict. A decision was taken not to pursue a retrial and he was acquitted.</li> <li>Marchment's conviction brings to a close a seven-year SFO-led investigation that covered numerous foreign jurisdictions.</li> </ul>
Mabey Engineering (Holdings) Ltd (Construction)	UK (SFO)	N/A	N/A	<ul style="list-style-type: none"> <li>Mabey Engineering (Holdings) Ltd was accused of no wrongdoing.</li> </ul>	<ul style="list-style-type: none"> <li>£130,000 civil recovery order under the Proceeds of Crime Act 2002.</li> </ul>	<ul style="list-style-type: none"> <li>The SFO has heralded this development as marking a broader approach to anti-corruption</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				<ul style="list-style-type: none"> <li>Instead, the recovered funds represented dividends paid by a subsidiary, Mabey and Johnson Ltd ("Mabey"), which was convicted in 2009 of corruption offences relating to overseas contracts.</li> </ul>	<ul style="list-style-type: none"> <li>The sum represents the dividends which Mabey collected from the contracts at the centre of the UN Sanctions prosecutions.</li> </ul>	enforcement, encompassing investors who receive the proceeds of corporate crime through dividends.
<b>2011</b>						
Victor Dahdaleh and Bruce Hall (Aluminium)	UK (SFO)	1998 - 2006	Bahrain	<ul style="list-style-type: none"> <li>The SFO had charged Mr Dahdaleh, who has dual British and Canadian nationality, with bribing officials of a Bahraini state-owned smelting company, Alba, in connection with contracts with US company, Alcoa.</li> <li>Mr Dahdaleh had been released on bail, having successfully contested original bail terms that included posting £10 million as security. He was banned from travelling and had to surrender his passport.</li> <li>Mr Hall, an Australian national who was extradited to the UK, had been charged with corruption offences relating to contracts for the supply of goods and services to a Bahraini company.</li> </ul>	<ul style="list-style-type: none"> <li>Mr Hall pleaded guilty to a charge of conspiracy to corrupt and was sentenced to 16 months' imprisonment on 22 July 2014. Mr Hall was also ordered to pay £500,000 to Alba in compensation plus a further £3 million in confiscation.</li> <li>The trial against Mr Dahdaleh collapsed on 10 December 2013. The SFO concluded that there was no longer a realistic prospect of conviction in the case.</li> <li>The SFO explained that this was because (1) Mr Hall gave evidence for the prosecution but the account he gave in court differed markedly from the witness statement he provided to the SFO and (2) two U.S. lawyers, who had played a</li> </ul>	<ul style="list-style-type: none"> <li>The DOJ and SEC in the US have both charged Alcoa with violating the Foreign Corrupt Practices Act of 1977 in January 2014, resulting in fines totalling \$384 million.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
					<p>critical role, refused to testify in court.</p> <ul style="list-style-type: none"> <li>The judge instructed the jury to return “not guilty” verdicts on all counts against Mr Dahdaleh.</li> </ul>	
Willis Limited (Insurance)	UK (FSA)	2005 - 2009	Egypt, Russia and others	<ul style="list-style-type: none"> <li>Between January 2005 and December 2009, Willis Limited (“Willis”) made payments totalling £27 million to overseas third parties who assisted in winning and retaining business from overseas clients, particularly in high risk jurisdictions.</li> <li>The FSA investigation found that, up until August 2008, Willis failed to take appropriate steps to ensure that payments it was making to overseas third parties were not being used for corrupt purposes.</li> </ul>	<ul style="list-style-type: none"> <li>£6.895 million civil fine by the FSA.</li> <li>Willis agreed to settle at an early stage of the FSA’s investigation and so qualified for a 30% discount under the FSA’s settlement discount scheme (the fine would otherwise have been £9.85 million).</li> <li>Willis has also agreed to conduct an extensive payments review covering any payment to an overseas third party made in the relevant period.</li> </ul>	<ul style="list-style-type: none"> <li>During the FSA investigation, Willis identified a number of payments totalling \$227,000 as suspicious. The payments were made to two overseas third parties in respect of business carried out in Egypt and Russia. These were subsequently reported to the Serious Organised Crime Agency.</li> <li>See the FSA <a href="#">Final Notice</a>.</li> </ul>
Macmillan Publishers Limited (Publishing)	UK (SFO, City of London Police)	2002 - 2009	Sudan, Rwanda, Uganda and Zambia	<ul style="list-style-type: none"> <li>The World Bank was notified that an agent of Macmillan Publishers Limited’s (“MPL”) Education Division in East and West Africa had attempted to influence a contract tender by offering bribes.</li> <li>The contracts under investigation were for the supply of educational material to national governments.</li> </ul>	<ul style="list-style-type: none"> <li>£11.26 million civil recovery order.</li> <li>Appointment of compliance monitor.</li> <li>MPL debarred from participating in World Bank funded tender business for a minimum of three years.</li> </ul>	<ul style="list-style-type: none"> <li>In March 2010 MPL reported the corporate case to the SFO with a view to co-operate. It also co- operated with the World Bank and complied with an agreed timetable for investigation, carried out by independent external counsel.</li> <li>MPL reviewed its internal anti- bribery and corruption policies and</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				<ul style="list-style-type: none"> <li>An investigation concluded that it was impossible to be sure that the awarding of tenders to MPL was not the result of corruption and revenue derived from them tainted.</li> </ul>	<ul style="list-style-type: none"> <li>MPL decided to cease all live and prospective public tenders in its Education Division business in East and West Africa.</li> </ul>	<p>procedures, appointing external consultants to recommend and help implement an appropriate anti-bribery and corruption compliance regime.</p>
DePuy International Ltd (Medical instruments)	UK (SFO)	1998 - 2006	Greece	<ul style="list-style-type: none"> <li>DePuy International Ltd ("DePuy") allegedly made payments to intermediaries for the purpose of bribing medical professionals working in the Greek public health system. These payments were 20% of the price of orthopaedic products marketed by DePuy.</li> <li>The Greek government paid DePuy's intermediaries approximately £33.5 million for orthopaedic products between 1998 and 2007.</li> <li>Former DePuy Director of Marketing Robert John Dougall admitted his involvement in £4.5 million allegedly corrupt payments to Greek doctors in the state healthcare system.</li> <li>Dougall acted on behalf of DePuy. He neither sought nor gained personal benefit from the arrangements.</li> </ul>	<ul style="list-style-type: none"> <li>£4.829 million civil recovery order.</li> <li>In the US a civil penalty of \$45.6 million plus interest was imposed. The Greek authorities also froze €5.785 million of the company's assets.</li> <li>Dougall received a 12 month suspended sentence</li> <li>The sentence was suspended on appeal after the judge at first instance refused to sentence in accordance with the deal struck between the SFO and Dougall.</li> </ul>	<ul style="list-style-type: none"> <li>Johnson &amp; Johnson (who bought DePuy in 1998) carried out an internal investigation in 2006 before making a report to the DOJ and SEC. This was then referred to the SFO.</li> <li>DePuy cooperated fully with the subsequent investigation by the SFO</li> <li>Dougall pleaded guilty and cooperated with the SFO</li> <li>Judge warned against agreements as to sentencing between the SFO and defendants.</li> </ul>
MW Kellogg Ltd (Construction)	UK (SFO)	1994 - 2004	Nigeria	<ul style="list-style-type: none"> <li>MW Kellogg Ltd ("MWKL") was one of four parties in a joint venture to bid for contracts on a liquefied natural gas project in Nigeria. Three of the four contracts won by the JV were obtained through promises to pay or payments of bribes.</li> </ul>	<ul style="list-style-type: none"> <li>£7 million civil recovery order. This sum represents the amount it was due to receive as dividends which were generated through the criminal activity of the joint ventures.</li> </ul>	<ul style="list-style-type: none"> <li>MWKL reported concerns to the SFO and fully co-operated with the subsequent investigation.</li> <li>The SFO and the US DOJ decided to confiscate the funds which would</li> </ul>



Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				<ul style="list-style-type: none"> <li>The SFO recognised that MWKL was used by its parent company Kellogg, Brown and Root ("KBR") and was not a willing participant in the corruption.</li> </ul>	<ul style="list-style-type: none"> <li>MWKL ordered to overhaul its internal audit and control measures to the satisfaction of the SFO.</li> <li>Parent company, KBR, reached a plea agreement in 2009 with the US DOJ, agreeing to pay \$402 million to settle the bribery case.</li> </ul>	become due to MWKL through the unlawful conduct.
<b>2010</b>						
Weir Group Plc	UK (COPFS)	September 2001 – April 2004	UK, Iraq	<ul style="list-style-type: none"> <li>In contravention of UN sanctions against Iraq, Weir Group Plc facilitated the payment of 'kickbacks' to the Iraqi Government (through an Iraqi national agent), from funds in the UN's Oil for Food Programme.</li> </ul>	<ul style="list-style-type: none"> <li>On 15 December 2010, the COPFS announced that Weir Group Plc would be fined £3 million and made subject to a £13.9 million confiscation under in relation to these 'kickbacks'.</li> </ul>	
Lynden Scourfield, David Mills, Alison Mills, Michael Bancroft, Tony Cartwright and Mark Dobson (Financial Services)	UK (CPS)	2003-2007	UK	<ul style="list-style-type: none"> <li>Lynden Scourfield, the lead director of HBOS's Impaired Assets Division, formed a corrupt relationship with David Mills and Michael Bancroft of the restructuring consultancy Quayside Corporate Services ("QCS").</li> <li>As a condition of HBOS's continued credit, Scourfield would require business owners in financial distress to appoint QCS as turnaround consultants. QCS would submit inflated business cases for additional finance (sometimes against the</li> </ul>	<ul style="list-style-type: none"> <li>In August 2016, Lynden Scourfield pleaded guilty to conspiracy to corrupt, conspiracy to launder the proceeds of crime and four counts of fraudulent trading. He was sentenced to 11 years and three months' imprisonment.</li> <li>A five-month trial at Southwark Crown Court resulted in the</li> </ul>	<ul style="list-style-type: none"> <li>The convictions follow a six year investigation by Thames Valley Police.</li> <li>The estimated cost to HBOS of Lynden Scourfield's lending activity is reported to exceed £266 million. Taken together with the value of ongoing losses suffered by business customers, the total value of the fraud is estimated to be near £1 billion.</li> <li>See the <a href="#">sentencing remarks</a>.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				<p>wishes of the owners) and HBOS, under Scourfield's influence, would extend further funds.</p> <ul style="list-style-type: none"> <li>QCS profited through charging very large fees and asset stripping struggling businesses, as well as taking control of various companies for the benefit of Mills and his associates.</li> <li>In return, Mills and his associates (including Bancroft, Tony Cartwright and Mills' wife, Alison) provided Scourfield with expensive gifts, cash, foreign travel and sexual entertainment.</li> </ul>	<p>conviction of five people on 30 January 2017.</p> <ul style="list-style-type: none"> <li>David Mills was convicted of conspiracy to corrupt, conspiracy to conceal criminal property and four counts of fraudulent trading. He was sentenced to 15 years' imprisonment.</li> <li>Michael Bancroft was convicted of conspiracy to corrupt, conspiracy to conceal criminal property and three counts of fraudulent trading. He was sentenced to 10 years' imprisonment.</li> <li>Alison Mills was convicted of conspiracy to conceal criminal property. She was sentenced to three and a half years' imprisonment.</li> <li>Ex-HBOS banker, Mark Dobson, was convicted of two charges, including conspiracy to corrupt. He was sentenced to four and a half years imprisonment.</li> <li>Tony Cartwright was convicted of fraudulent trading and conspiracy to conceal criminal property. He was sentenced to</li> </ul>	

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
					<p>three and a half years' imprisonment.</p> <ul style="list-style-type: none"> <li>Jonathan Cohen, an accountant, was cleared of two charges of fraudulent trading and conspiracy to conceal criminal property.</li> </ul>	
Julian Messent (Insurance)	UK (SFO, City of London Police)	1999-2002	Costa Rica	<ul style="list-style-type: none"> <li>Former director of PWS International (insurance broker) authorised corrupt payments of almost US \$2 million to Costa Rican officials in the state insurance power companies.</li> <li>The payments were inducements or rewards for assisting in the retention of PWS as broker of lucrative reinsurance policies.</li> </ul>	<ul style="list-style-type: none"> <li>Messent received 21 months' imprisonment and was ordered to pay £100,000 compensation to the Republic of Costa Rica.</li> </ul>	<ul style="list-style-type: none"> <li>Messent pleaded guilty.</li> <li>He received performance related bonuses from the corrupt contracts and only cooperated with prosecutors some way into the investigation.</li> <li>At his trial the judge described him as of previous good character and noted that perhaps he had not appreciated the seriousness of what he did at the time. However, this was no excuse.</li> </ul>
Innospec (Chemicals) Ltd	UK (SFO)	1999-2006	Indonesia	<ul style="list-style-type: none"> <li>Innospec pleaded guilty to bribing employees of Pertamina (an Indonesian state owned refinery) and other government officials in Indonesia to facilitate sales of fuel additives.</li> </ul>	<ul style="list-style-type: none"> <li>£8.3 million UK fine.</li> <li>Joint UK-US monitor at Innospec's expense for up to 3 years.</li> <li>Judge commented that plea deal wholly inadequate and criticised SFO approach.</li> </ul>	<ul style="list-style-type: none"> <li>Coordinated action by the SFO, US DOJ, SEC and OFAC.</li> <li>Innospec pleaded guilty following referral of investigation by US DOJ to the SFO.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
					<ul style="list-style-type: none"> <li>Further fines of \$14.1 million to the US DOJ, \$11.2 million to the SEC and \$2.2 million to OFAC.</li> </ul>	
BAE Systems plc and (Defence aerospace)	UK (SFO)	1999	Tanzania Investigation covered Kingdom of Saudi Arabia, Romania and South Africa	<ul style="list-style-type: none"> <li>Failure to keep accurate business records in accordance with section 221 Companies Act 1985.</li> <li>A sales agent was paid \$12.4 million in relation to the sale of a radar system in Tanzania.</li> <li>It was accepted that there was a high probability that some of this money was used to influence the negotiation process in BAE's favour.</li> <li>No charge of corruption brought, but the judge commented that the agent was clearly not just a well-paid lobbyist.</li> </ul>	<ul style="list-style-type: none"> <li>£30 million penalty agreed; £0.5 million paid as a fine, £29.5 million in reparations to the people of Tanzania and £225,000 in prosecution costs.</li> <li>The scope of the settlement agreement was criticised by the judge, but upheld.</li> <li>BAE was also fined \$400 million in the US for making false statements to the US government regarding its FCPA compliance programme.</li> </ul>	<ul style="list-style-type: none"> <li>BAE pleaded guilty to failing to keep reasonably accurate accounting records, contrary to the Companies Act.</li> <li>The settlement was that BAE would pay £30 million, part as a fine and the rest in reparation to Tanzania. It included an agreement that no further prosecution of BAE would be brought. The court ordered a fine of £500,000, to maximise the sum available for reparations.</li> <li>The judge took into account the work BAE had since undertaken to improve its ethics compliance, including a review and public report by an independent panel headed by Lord Woolf.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
<b>2009</b>						
AMEC (Construction)	UK (SFO)	2005-2007	South Korea	<ul style="list-style-type: none"> <li>AMEC took "irregular receipts" in relation to the construction of the Incheon Bridge, Korea.</li> <li>The irregularities were discovered due to questionable descriptions in AMEC's books and records.</li> </ul>	<ul style="list-style-type: none"> <li>£4.9 million civil recovery order.</li> <li>Appointment of compliance monitor.</li> </ul>	<ul style="list-style-type: none"> <li>This case was unusual, being a case of inbound bribery.</li> <li>AMEC made a referral to the SFO following an internal investigation and cooperated with the subsequent investigation.</li> </ul>
Mabey & Johnson (Construction)	UK (SFO)	1993-2001	Ghana, Jamaica and Iraq	<ul style="list-style-type: none"> <li>Mabey &amp; Johnson tried to influence officials in Jamaica and Ghana when bidding for public contracts.</li> <li>The company paid more than \$200,000 (£123,000) to Saddam Hussein's regime in Iraq, violating the terms of the UN oil for food programme.</li> </ul>	<ul style="list-style-type: none"> <li>£6.6 million fine.</li> </ul>	<ul style="list-style-type: none"> <li>Voluntary disclosure to the SFO in 2008 in relation to Ghanaian and Jamaican bribery was made.</li> <li>The breach of UN sanctions in Iraq came to light in the UN Volcker report. Three former directors were charged separately with making corrupt payments.</li> </ul>
Aon (Insurance)	UK (SFO)	2005-2007	Egypt	<ul style="list-style-type: none"> <li>Suspicious payments totalling around \$7 million paid to overseas firms and individuals.</li> <li>No corruption proven.</li> <li>FSA found a failure to establish and maintain effective systems and controls.</li> </ul>	<ul style="list-style-type: none"> <li>£5.25 million civil fine by the FSA.</li> </ul>	<ul style="list-style-type: none"> <li>The fine was reduced from £7.5 million as Aon cooperated with the FSA.</li> <li>See the FSA's <a href="#">Final Notice</a>.</li> </ul>
<b>2008</b>						
Balfour Beatty (Engineering)	UK (SFO)	1996	Egypt	<ul style="list-style-type: none"> <li>Failure to keep accurate business records in accordance with section 221 Companies Act 1985.</li> </ul>	<ul style="list-style-type: none"> <li>£2.25 million civil recovery order.</li> </ul>	<ul style="list-style-type: none"> <li>Balfour Beatty self-reported to the SFO immediately upon discovery of</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Countries involved	Summary of offence	Result	Additional facts
				<ul style="list-style-type: none"> <li>Inaccurate records related to payments made by a subsidiary during construction of The Bibliotheca Project in Alexandria, Egypt.</li> </ul>		the irregularity and accepted unlawful conduct had taken place.
CBRN (Security)	UK (City of London Police, CPS)	2007	Uganda	<ul style="list-style-type: none"> <li>CBRN won six contracts worth a total of £500,000 in Uganda.</li> <li>Five payments totalling £83,000 were made to a government advisor and a Ugandan military officer.</li> <li>The Ugandan government advisor had demanded extra payments from CBRN for what he called "local taxes".</li> </ul>	<ul style="list-style-type: none"> <li>CBRN managing director was given a 5 month suspended sentence.</li> <li>Ugandan government advisor was jailed for 1 year.</li> </ul>	<ul style="list-style-type: none"> <li>The managing director gave full and frank confession soon after arrest and cooperated with the prosecution.</li> </ul>