

## Corruption enforcement tracker

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Update
<b>Recent updates</b>					
Unaoil (Oil)	UK (SFO)	2005-2011		Private	<ul style="list-style-type: none"> <li>On 13 July 2020, two former Unaoil executives, Ziad Akle and Stephen Whiteley, were convicted of conspiring to make corrupt payments to Iraqi government officials to win lucrative oil contracts worth \$55 million. A former Iraq Ministry of Oil official, Basil Al Jarah, pleaded guilty to conspiring to make corrupt payments to secure contracts worth \$800m.</li> <li>Further information is available in the 'Unaoil' row under the 2016 section below.</li> </ul>
De La Rue plc (Procurement)	UK (SFO)		UK and South Sudan	Public	<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 didn't meet the test for prosecution.</li> <li>Further information is available in the 'De La Rue plc' row under the 2019 section below.</li> </ul>
Andrew Skeene, Omari Bowers (Timber)	UK (SFO)	2010 – 2015			<ul style="list-style-type: none"> <li>On 11 June 2020, both Mr Skeene and Mr Bowers pleaded not guilty to conspiracy to defraud, forgery and misconduct in the course of winding up contrary to s.208(1)(d) of the Insolvency Act 1986 as well as making a false statement under oath.</li> <li>Further information is available in the 'Andrew Skeene, Omari Bowers' row under the 2019 section below.</li> </ul>
ABB Ltd (Engineering)	UK (SFO)		UK	Private	<ul style="list-style-type: none"> <li>On 19 May 2020, the SFO announced that it was dropping its corruption probe into ABB Ltd and that it had concluded its case.</li> <li>Further information is available in the 'ABB Ltd' row under the 2017 section below.</li> </ul>
GPT Special Project Management Ltd (Airbus)	UK (SFO) France (PNF) USA (DOJ)	2011-2015	UK, USA, France, Sri Lanka, Malaysia, Indonesia, Taiwan and Ghana	Private	<ul style="list-style-type: none"> <li>On 30 July 2020 Airbus saw a new slew of charges against the company over its work in Saudi Arabia,</li> <li>On 14 September 2020 Airbus Unit GPT Special Project Management Ltd and three linked individuals had their corruption cases sent to UK higher court to face criminal trials following charges brought by the SFO in July.</li> <li>Further information available in the "GPT Special Project Management Ltd (Airbus)" row under the 2020 section below.</li> </ul>
Axiom Legal Financing Fund	UK (SFO)	2010-2012	Cayman Islands		<ul style="list-style-type: none"> <li>Three individuals linked to the collapse of a Cayman Islands fund will appear in Westminster Magistrate's Court on 30 September 2020 to answer to fraud charges.</li> <li>Further information is available in the "Axiom Legal Financing Fund" row under the 2020 section below.</li> </ul>
Konstantin Vishnyak (Banking)	UK (FCA)		UK	Private	<ul style="list-style-type: none"> <li>Mr Vishnyak was charged with one count of destroying documents that he knew or suspected were relevant to an investigation and now faces trial on 21 September 2020.</li> <li>Further information is available in the "Konstantin Vishnyak" row under the 2019 section below.</li> </ul>
KBR Inc. (Engineering and Construction)	UK (SFO)		UK	Private	<ul style="list-style-type: none"> <li>KBR and the SFO are set to appear in the Supreme Court on 13 October 2020 despite the closing of bribery investigations in early August 2020.</li> <li>Further information is available in the "KBR Inc" row under the 2017 section below.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/ Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
<b>2020</b>							
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 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.</li> <li>Mr Emmett faces 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>The SFO's investigation was launched in July 2014, publicly announced in May 2017 and charging decision was announced 21 August 2020.</li> <li>All three men will appear at Westminster Magistrates' Court on 30 September 2020 to enter their plea to the charges.</li> </ul>
Joseph El-Khouri (Pharmaceuticals)	UK USA (DOJ)	2015	UK, USA	Private	<ul style="list-style-type: none"> <li>Mr El-Khouri was arrested in the UK on 21 October 2019.</li> <li>Mr El-Khouri faces 11 charges in the USA that he conspired with investment bankers to access secret share-trading information to make illegal trades.</li> <li>A two-day extradition hearing has been set for 15-16 June 2020 at Westminster Magistrates' Court.</li> </ul>		<ul style="list-style-type: none"> <li>Mr El-Khouri was granted bail on 6 November 2019.</li> </ul>
GPT Special Project	UK (SFO) France (PNF) USA (DOJ)	2011-2015	UK, USA, France, Sri Lanka,	Private	<ul style="list-style-type: none"> <li>As of 30 July 2020, managing director Jeffrey Cook and former financial officer</li> </ul>		<ul style="list-style-type: none"> <li>On 30 July 2020 Airbus subsidiary, GPT Special Project</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/ Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
Management Ltd (Airbus)			Malaysia, Indonesia, Taiwan and Ghana		<p>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.</p> <ul style="list-style-type: none"> <li>Mr Cook has also been charged with misconduct in public office, a common law offence, between September 2004 and November 2008 over commissions paid to him on contracts with ME Consultants while an employee of the UK's Ministry of Defence.</li> <li>An individual, Terence Dorothy, has been charged with aiding and abetting that corruption.</li> </ul>		Management Ltd, and three linked individuals, saw a new slew of charges against the company over its work in Saudi Arabia,
Airbus SE (Aerospace)	UK (SFO) France (PNF) USA (DOJ)	2011-2015	UK, USA, France, Sri Lanka, Malaysia, Indonesia, Taiwan and Ghana	Private	<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> <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>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: <ul style="list-style-type: none"> <li>€398,034,571 (fine);</li> <li>€585,939,740 (disgorgement of profits); and</li> <li>€6,989,401 (SFO's Costs).</li> </ul> </li> <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>	<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>

2019

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
Glencore PLC (Mining and Commodity trading)	UK (SFO)		UK, USA, Brazil	Public	<ul style="list-style-type: none"> <li>On 5 December 2019, the SFO confirmed that it was investigating suspicions of bribery in the conduct of business by Glencore PLC (“Glencore”) of companies, its officials, employees, agents and associated persons.</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> </ul>
Nicholas Woods and Simon Marshall (Public services, consumer industries)	UK (SFO)	2010-2013	UK	Public	<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>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. On 19 February 2020, both individuals pleaded not guilty to the charges.</li> <li>Serco Geografix reported these offences to the SFO in November 2013.</li> </ul>	<ul style="list-style-type: none"> <li>The SFO’s investigation continues.</li> <li>Nicholas Woods and Simon Marshall are set to face trial in January 2021.</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>Under the terms of the three-year DPA, Serco Geografix agreed to pay a fine of £19.2 million, plus SFO investigation costs of £3.7 million.</li> <li>It was announced on 25 January 2020 that Serco shareholders have issued a claim for damages in relation to the fraud.</li> </ul>
Dax Price, Giuseppe Pagliara (Football)	UK (CPS)	2016	UK	Private	<ul style="list-style-type: none"> <li>Mr Price and Mr Pagliara were football agents who bribed Tommy Wright, the former Barnsley FC coach.</li> <li>Mr Wright was paid £5,000 to encourage players to sign with Mr Price and Mr Pagliara’s agency, place players they represented and pass on the club’s confidential commercial information to its players.</li> </ul>	<ul style="list-style-type: none"> <li>Mr Price and Mr Pagliara were convicted of bribing the former Barnsley FC coach Tommy Wright.</li> <li>Mr Wright was also convicted of accepting a bribe.</li> <li>Mr Pagliara was convicted and sentenced to a suspended two years’ imprisonment with 300 hours community service to be completed.</li> <li>Mr Price was sentenced to a suspended 18 months’ imprisonment with 250 hours service to be completed.</li> </ul>	<ul style="list-style-type: none"> <li>This is the first football prosecution under the Bribery Act 2010.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
						<ul style="list-style-type: none"> <li>Mr Wright was sentenced to a suspended 12 months' imprisonment and ordered to pay back the £5,000.</li> </ul>	
Konstantin Vishnyak (Banking)	UK (FCA)		UK	Private	<ul style="list-style-type: none"> <li>The FCA has alleged that Mr Vishnyak (a former employee of VTB Capital), whilst under investigation by the FCA for insider dealing offences, deleted the WhatsApp application on his mobile phone after he was required to provide it as part of the investigation.</li> <li>Mr Vishnyak was charged with one count of destroying documents that he knew or suspected were relevant to an investigation. He denies allegations.</li> </ul>	<ul style="list-style-type: none"> <li>The trial is expected to start in either March or August 2020 and is expected to last four days.</li> </ul>	<ul style="list-style-type: none"> <li>This is the first prosecution by the FCA in relation to a destruction of documents offence under the Financial Services and Markets Act 2000.</li> <li>Mr Vishnyak now faces trial on 21 September 2020.</li> </ul>
Roger Jenkins, Thomas Kalaris, Richard Boath (Banking)	UK (SFO)	2008	UK and Qatar	Private	<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>On 28 February 2020, all three individuals were acquitted of all wrongdoing.</li> <li>The jury took five hours to deliver the verdict and the. 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>Mr Boath did not give evidence in his defence.</li> <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>
Andrew Skeene, Omari Bowers (Timber)	UK (SFO)	2010 – 2015			<ul style="list-style-type: none"> <li>The SFO is investigating Mr Skeene and Mr Bowers (a former director of Global Forestry Investments) for conspiracy to defraud, forgery and misconduct in the course of winding up contrary to s.208(1)(d) of the Insolvency Act 1986 as well as making a false statement under oath.</li> </ul>	<ul style="list-style-type: none"> <li>Mr Skeene appeared in court on 28 October 2019 to formally enter a plea against the SFO-led charges.</li> <li>On 11 June 2020, both Mr Skeene and Mr Bowers pleaded not guilty to the charges.</li> <li>The trial of both individuals is due to start on 06 April 2021 and is expected to last 12 weeks.</li> </ul>	
De La Rue plc (Procurement)	UK (SFO)		UK and South Sudan	Public	<ul style="list-style-type: none"> <li>De La Rue plc ("De La Rue"), the company responsible for printing banknotes for countries worldwide,</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</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>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
					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.	investigation, the SFO stated that the case didn't meet the test for prosecution.	
Greenergy International Ltd (Energy)	UK (SFO)		UK and 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>The SFO's investigation continues.</li> <li>In December 2019, Greenergy announced that the SFO informed them that Greenergy and their employees are no longer suspects in an ongoing investigation.</li> </ul>	
<b>2018</b>							
Guralp Systems Ltd (Seismic equipment)	UK (SFO)	2002 - 2015	South Korea	Private	<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-Managing Director, Andrew Bell and an employee, Natalie Pearce.</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 payment due to the financial difficulties Guralp Systems is currently facing.</li> <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>	<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> </ul>
Alca Fasteners Ltd (Industrial Supplies)	UK (SFO)	2008-2017	Norway	Private	<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</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/ Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
							Norwegian businessman Terje Vidar Moe, who pleaded guilty to receiving bribes.
Rapid Engineering Supplies Limited / Kevin Herbert/ John Payne/Neil Simpkins (Engineering Supplies)	UK (CPS)	2011-2013	UK	Private	<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>(i) Kevin Herbert (34, faces 3 bribery charges);</li> <li>(ii) John Payne (54, faces 1 bribery charge); and</li> <li>(iii) 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>
Ultra Electronics Holdings plc (Defence)	UK (SFO)		Algeria, Philippines	Private	<ul style="list-style-type: none"> <li>The SFO has informed Ultra Electronics Holdings plc ("Ultra") that it has opened an investigation into suspected corruption in Algeria by Ultra, its subsidiaries, employees and associated persons.</li> <li>On 7 August 2019, the company announced that it is investigating possible bribery linked to the company in the Philippines.</li> </ul>	<ul style="list-style-type: none"> <li>The SFO's investigation continues.</li> </ul>	<ul style="list-style-type: none"> <li>Ultra self-reported concerns regarding conduct to the SFO.</li> <li>The company spent £2.3 million in legal costs in 2018 dealing with the ongoing probe.</li> </ul>
Caracal Energy (formerly Griffiths Energy)/Ikram Saleh (Energy)	UK (SFO)	2013 (Conviction)	USA, Canada, Chad	Private	<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>	
Skansen Interiors Limited (Refurbishment)	UK (NCA, City of London Police and the CPS)	2013	UK	Private	<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> </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</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> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
					<ul style="list-style-type: none"> <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>Skansen Interiors to prevent bribery, and so the company's attempted use of the statutory defence contained within s7 (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 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, disqualified from acting as a director for 7 years and fined £10,697.54.</li> </ul>	<ul style="list-style-type: none"> <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: <a href="#">First contested UK prosecution for failing to prevent bribery leads to conviction.</a></li> </ul>
Chemring Group PLC and Chemring Technology Solutions Limited ("CTSL") (Defence)	UK (SFO)	2011 and earlier	UK, US	Private	<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>
<b>2017</b>							
Standard Chartered PLC (Banking)	UK (FCA)	2012-2015	Indonesia	Private	<ul style="list-style-type: none"> <li>Standard Chartered PLC ("Standard Chartered") executives sat on the board of Maxpower, an Indonesian power</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</li> </ul>	<ul style="list-style-type: none"> <li>The group continues its discussions relating to an investigation by the US authorities</li> </ul>



Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
					<p>plant builder, whose executives paid bribes to win business.</p> <ul style="list-style-type: none"> <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>	<p>imposing a penalty of £102,163,200 (net of a 30% early settlement discount) on the group.</p> <ul style="list-style-type: none"> <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>	<p>relating to historical violations of US sanctions laws and regulations.</p>
Eurasian Natural Resources Corporation ("ENRC") (Mining)	UK (SFO)	2013	Democratic Republic of the Congo, Kazakhstan	Private	<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 Democratic Republic of the Congo at a significant undervalue.</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> <li>The SFO has stated that it will not appeal this decision further.</li> <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>ENRC has filed another legal claim against the SFO in a bid to halt criminal charges against it until the conclusion of an ongoing civil issues. In response, the SFO have halted the start of its review until the conclusion of civil proceedings.</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="#">ENRC – Where does it really leave us?</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. ENRC persuaded the court that it would help the company find the source of a series of leaks about the SFO's investigation.</li> <li>As a result, ENRC has filed a High Court damages claim against a former leader of Kazakhstan, claiming he unlawfully obtained confidential information about ENRC and leaked it to the SFO.</li> <li>The daughter of the co-founder of ENRC, Anna Machkevitch, was convicted at Westminster Magistrates' Court on 30 January 2020 for failing to produce documents sought by the SFO linked to the criminal probe.</li> <li>Ms Mchkevitch was fined £981, plus costs to be determined but is</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/ Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
							<p>considering an appeal against her conviction.</p> <ul style="list-style-type: none"> <li>ENRC has a separate claim against Dechert in the High Court. The law firm denies any wrongdoing. Neil Gerrard, a senior Dechert lawyer, involved in the corruption probe has accused ENRC of being behind an operation to illegally spy on him, according to court documents.</li> <li>On 14 February 2020, it was ordered that ENRC will see its two damages suits; one against the Serious Fraud Office and one against law firm Dechert plus lawyer Neil Gerrard joined together.</li> <li>Mr Gerrard is said to have retired from Dechert. Mr Gerrard is suing ENRC and investigations company Diligence International for unlawful surveillance.</li> </ul>
Formula One Group (Auto racing)	UK (SFO)	2013	UK	Private	<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>

Name	Enforcement Jurisdiction	Year of offence	Country/ Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
British American Tobacco PLC (Tobacco)	UK (SFO)		UK, Kenya	Private	<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>The SFO's investigation continues.</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> <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>
Wassim Tappuni (Procurement)	UK (City of London Police)	2008-2013	UK	Public	<ul style="list-style-type: none"> <li>Wassim Tappuni, an expert in the procurement of medical equipment engaged to represent the interests of the World Bank and the UN Development Programme, was prosecuted for allegedly providing confidential information to companies involved in the procurement process and advising them on how to edit their bids in return for a percentage of the contract value.</li> <li>Between April 2008 and June 2013, Wassim Tappuni received 65 corrupt payments totalling just under £1.7 million from 12 companies based in Austria, France, Germany, the Netherland and Kazakhstan. The funds</li> </ul>	<ul style="list-style-type: none"> <li>Wassim Tappuni was convicted on 25 July 2017.</li> <li>On 22 September 2017, he was sentenced at the Southwark Crown Court to six years' imprisonment.</li> </ul>	<ul style="list-style-type: none"> <li>Co-defendant Joe Obayda, who had previously admitted creating the sham invoices used by Wassim Tappuni, was cleared of six charges of money laundering and false accounting.</li> <li>The Swiss authorities have frozen the funds held in the Swiss bank accounts on behalf of UK prosecutors.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
					were received under false invoices and paid into Swiss bank accounts. •		
Rio Tinto Group (Mining and Natural Resources)	UK (SFO)	2008	UK, Republic of Guinea	Private	<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 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.</li> </ul>
John Wood Group PLC (Formerly: Amec Foster Wheeler PLC) (Oil Services)	UK (SFO)			Private	<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>The SFO's investigation continues. •</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>
Petrofac Limited (Oil and Gas)	UK (SFO)	2002-2009	UK, Kazakhstan	Private	<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</li> </ul>	<ul style="list-style-type: none"> <li>Marwin 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</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</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
					<p>that worked with Petrofac, primarily in Kazakhstan between 2002 and 2009.</p> <ul style="list-style-type: none"> <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>	<p>related to the awarding of corrupt contracts worth \$370 million in Iraq and more than \$3.5 billion in Saudi Arabia.</p> <ul style="list-style-type: none"> <li>A date has not yet been set for David Lufkin's sentencing.</li> </ul>	<p>Chedid, had been suspended until further notice and resigned from the board, and offered its support to the SFO.</p> <ul style="list-style-type: none"> <li>In light of the SFO's investigation, Petrofac has announced a planned compliance overhaul.</li> </ul>
KBR Inc. (Engineering and Construction)	UK (SFO)			Private	<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>The SFO's investigation continues.</li> <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>	<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 are set to appear in the Supreme Court on 13 October 2020 despite the closing of bribery investigations in early August 2020.</li> </ul>
ABB Ltd (Engineering)	UK (SFO)		UK	Private	<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>The SFO's investigation continues.</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 "concerning certain of its past dealings with Unaoil and its subsidiaries, including alleged improper payments made by these entities to third parties."</li> <li>On 28 March 2019, ABB said that an internal investigation had turned up concerns about ABB's dealings with Eskom, the South</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
							<p>African state power utility, and related persons. In a filing with the SEC it also mentioned a previously disclosed internal investigation relating to Unaoil.</p> <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.</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 Eradication Commission)	1989-2013	UK, Indonesia, China, India, Thailand, Russia, Nigeria, Malaysia	Both	<ul style="list-style-type: none"> <li>Rolls-Royce plc ("Rolls-Royce") plc 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 to intermediaries in several foreign jurisdictions.</li> <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>	<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 one count of conspiracy to violate the Foreign Corrupt Practices Act ("FCPA"), and one count of violation of the FCPA.</li> <li>(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.</li> <li>(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.</li> </ul> </li> <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 Deferred Prosecution Agreement ("DPA") entered into by Rolls-Royce, Rolls-Royce Energy Systems Inc and the SFO.</li> <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> </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> <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 <a href="#">judgment</a> approving the DPA.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/ Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
						<ul style="list-style-type: none"> <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> <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>	<ul style="list-style-type: none"> <li>Analysis is available: "<a href="#">Rolls-Royce becomes third company to enter UK DPA</a>"</li> <li>Unaoil, a Monaco-based oil consultancy which the SFO is investigating, was mentioned in court documents.</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> </ul>
<b>2016</b>							
Unaoil (Oil)	UK (SFO)	2005-2011		Private	<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> <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</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 into KBR</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/ Countries involved	Public /Private sector	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>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.</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 January 2018, although no pleas were entered.</li> <li>Saman Ahsani, a fifth executive, is also sought by the SFO for similar charges. On 28 February 2018, Monaco rejected the SFO's request to extradite Saman Ahsani following an "adverse opinion" from Monaco's Court of Appeal. The decision cannot be appealed.</li> <li>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>On 13 July 2020, Mr Akle and Mr Whiteley, were convicted of conspiring to make corrupt payments to Iraqi government officials to win lucrative oil contracts 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>Mr Akle and Mr Whiteley were found guilty of conspiring to make corrupt payments to "level the playing field" against their competitors, following the 10-week trial.</li> </ul>	<ul style="list-style-type: none"> <li>connected with Unaoil were closed.</li> <li>In March 2019 Cyrus Ahsani (ex-CEO) and Saman Ahsani (former COO) entered guilty pleas in March 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 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>The trial was halted amidst COVID-19 concerns but resumed again on 11 May 2020 at London's Central Criminal Court with social distancing measures in place. The sentencing of Mr Akle and Mr Whiteley has been scheduled for July 22 and 23 at Southwark Crown Court.</li> </ul>



Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
						<ul style="list-style-type: none"> <li>• Counsel for Mr Akle has confirmed that he will seek to appeal the verdict.</li> <li>• The jury was unable to reach a verdict in respect of Mr Bond. The SFO will retry.</li> <li>• The SFO's wider investigation into suspected misconduct by companies and individuals linked to Unaoil is still ongoing.</li> <li>• Mr Akle was sentenced on 24 July 2020 to five years in prison for conspiracy to bribe an Iraqi government official.</li> <li>• Mr Whiteley was sentenced to three years in prison on 30 July 2020 for his "<i>intended and actual</i>" part in the bribery.</li> </ul>	
Alastair Baird and others (Property Development)	UK (Metropolitan Police)	2015	UK	Private	<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>• Both the Metropolitan Police and Barratt's internal investigations remain ongoing.</li> <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 06 September 2017, Barratt confirmed that it continues to cooperate with the Metropolitan Police.</li> </ul>
Aisha Elliott and Stephen Oates (Insurance)	UK (City of London Police)	2014-2015	UK	Private	<ul style="list-style-type: none"> <li>• Stephen Oates, a consultant in the Third Party team of the insurer, LV, provided confidential customer information to a claims management company in order to make a personal profit.</li> <li>• Aisha Elliott of Elkador Finance Ltd paid Oates £150 each time she made a successful claim using customer data he provided.</li> <li>• Elliott paid Oates a total of nearly £16,000 for the data he supplied, and</li> </ul>	<ul style="list-style-type: none"> <li>• On 20 December 2016, Aisha Elliott and Stephen Oates were both sentenced to 12 months' imprisonment after admitting one count of bribery.</li> </ul>	<ul style="list-style-type: none"> <li>• This is the first time an investigation by the City of London Police's Insurance Fraud Enforcement Department has resulted in a conviction under the Bribery Act 2010.</li> <li>• This is the first conviction of its kind under the Bribery Act 2010, showing that breaching an employer's confidence for money will fall within the scope of the Act.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
					made £39,000 in commission for her successful claims.		
Ronald Harper, Steven Thompson, Glynn Orridge, Christopher Murphy, Aseai Zlaoui and Alan Rollinson (Procurement)	UK (CPS)	2006-2011	UK	Private	<ul style="list-style-type: none"> <li>Ronald Harper, a former Deputy Property Manager within the Royal Household, received £75,000 in payments (£55,000 from Melton Power Services and £20,000 from BSI Nordale) from companies which were awarded lucrative and prestigious contracts for mechanical and electrical work at the Royal Estate, and in connection with the awarding of a Royal Warrant.</li> <li>Steven Thompson and Glynn Orridge of Melton Power Services, and Christopher Murphy and Aseai Zlaoui of BSI Nordale were charged with conspiring to make corrupt payments and to defraud their respective companies.</li> <li>Alan Rollinson (from whose bank account the payments by BSI Nordale were made) was charged with money laundering offences.</li> </ul>	<ul style="list-style-type: none"> <li>Ronald Harper was convicted of two counts of conspiring to receive corrupt payments. He was sentenced to a total of five years' imprisonment.</li> <li>Steven Thompson pleaded guilty to charges of conspiracy to make corrupt payments and conspiracy to commit fraud. He was sentenced to a total of 18 months' imprisonment.</li> <li>Glynn Orridge pleaded guilty to a charge of conspiracy to commit fraud. A Community Order of 100 hours unpaid work was imposed.</li> <li>Christopher Murphy was convicted of conspiracy to make corrupt payments. He was sentenced to 18 months' imprisonment.</li> <li>Aseai Zlaoui was convicted of conspiracy to make corrupt payments. He was sentenced to 12 months' imprisonment (suspended for 24 months) and a Community Order of 200 hours unpaid work.</li> <li>Alan Rollinson was convicted of converting or transferring stolen property. He was sentenced to 12 months' imprisonment (suspended for 24 months) and a Community Order of 200 hours unpaid work.</li> </ul>	
F.H. Bertling Limited (Freight and Logistics)	UK (SFO)	2005-2006, 2010-2013	UK, Angola	Private	<p><u>Sonangol bribery:</u></p> <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 1906 and section 1 of the Criminal Law Act 1977.</li> </ul>	<p><u>Sonangal bribery:</u></p> <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 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.</li> <li>On 21 September 2017, Peter Ferdinand was returned a not guilty verdict.</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> <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> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
					<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>	<ul style="list-style-type: none"> <li>On 20 October 2017, Judge Peden 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 Guisepe 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 handed a six-month prison sentence suspended for two years as well as electronically monitored for 28 days (instead of fined).</li> <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>	<ul style="list-style-type: none"> <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>
Robert Gillam and Simon Davies (Defence Procurement)	UK (CPS)	2009	UK, USA	Private	<ul style="list-style-type: none"> <li>Robert Gillam, current director of Mondial Defence Systems, and Simon Davies, a former director, paid \$193,665 in bribes to obtain a series of supply contracts worth approximately \$6 million with the US government.</li> <li>They bribed Robert Gannon, a former director of a US defence contractor, who pleaded guilty to one criminal charge in</li> </ul>	<ul style="list-style-type: none"> <li>Robert Gillam and Simon Davies both pleaded guilty to charges of bribery under the Prevention of Corruption Act 1906.</li> <li>On 28 September 2016, Robert Gillam was sentenced to two years' imprisonment and disqualified from being a company director for five years. Simon Davies was sentenced to 11 months'</li> </ul>	<ul style="list-style-type: none"> <li>Mondial Defence Systems itself is not alleged to have been implicated in the bribes that were paid.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
					2015 following an FBI and US DOJ investigation.	<p>imprisonment and disqualified from being a company director for two years.</p> <ul style="list-style-type: none"> <li>On 23 February 2018 Robert Gillam was ordered to pay back £1.58 million in criminal profits that he obtained from the scheme. Simon Davies agreed to pay £76,439 in profits earlier the same day.</li> </ul>	
Braid Group (Holdings) Limited (Freight and Logistics)	UK (Crown Office and Procurator Fiscal Service)	2012	UK (Scotland)	Private	<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> <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>An agreed civil settlement between Braid Group and the Crown Office for a total of £2.2 million.</li> <li>The Braid Group has confirmed that all employees connected to the activities have been dismissed.</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 matter was resolved by means of a civil settlement, it is unclear exactly how the offence was made out.</li> </ul>
<b>2015</b>							
Soma Oil & Gas Limited (Oil and Gas)	UK (SFO)	2013-2015	UK, Somalia	Public	<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 “<i>capacity building payments</i>” 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 <i>R (on the application of Soma Oil and Gas Limited) v Director of the Serious Fraud Office</i>.</li> </ul>
George Alexander, Stephen Dartnell, Carl Cumiskey and Simon Mundy (Telecoms)	UK (SFO)	2007-2010	UK	Private	<ul style="list-style-type: none"> <li>George Alexander and Stephen Dartnell of Total Asset Limited (trading as Total Asset Finance) conspired with Carl Cumiskey of H2O Networks Limited (“H2O”) to create, sign and sell falsely inflated or entirely false contracts from H2O to business lenders, Barclays Bank and KBC.</li> </ul>	<ul style="list-style-type: none"> <li>On 10 February 2017, the following sentences were handed down: <ul style="list-style-type: none"> <li>(i) George Alexander was found guilty on two counts of conspiracy to commit fraud by false representation and sentenced to 12 years’ imprisonment.</li> </ul> </li> </ul>	

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
					<ul style="list-style-type: none"> <li>• Dartnell paid nearly £900,000 to Simon Mundy, an employee of KBC, to act as an “inside man” and approve the funding provided by the bank.</li> <li>• Between 2007 and 2010, the fraud amounted to nearly £160m.</li> </ul>	<ul style="list-style-type: none"> <li>(ii) Stephen Dartnell was found guilty on two counts of conspiracy to commit fraud by false representation and one count of conspiracy to give corrupt payments. He was sentenced to 15 years’ imprisonment.</li> <li>(iii) Carl Cumiskey was found guilty on two counts of conspiracy to commit fraud and sentenced to 10 years’ imprisonment.</li> <li>(iv) Simon Mundy was found guilty on one count of conspiracy to commit fraud by false representation and one count of conspiracy to give corrupt payments. He was sentenced to 7 years’ imprisonment.</li> </ul>	
Sweett Group PLC (Quantity Surveyor)	UK (SFO)	2012-2015	U.A.E.	Private	<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> <li>• Analysis is available: “<a href="#">Two cases under the Bribery Act: Guilty plea</a>”</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
Innovia Securrency PTY Ltd (Procurement)	UK and Australia (SFO, Australian Federal Police)	2007-2009	UK, Australia	Both	<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> <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>	<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>
ICBC Standard Bank (formerly Standard Bank Plc)	UK	2013	Tanzania	Both	<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,</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	Country/ Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
(Financial Services)					<p>for 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> <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	Private	<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</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>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
					an extensive investigation, and self-reported its failure to prevent bribery pursuant to section 7 of the Bribery Act 2010.		
Charles Owenson, James Costello, Kevin Balmer and Brandon Cantwell (Edinburgh City Council)	Scotland (Crown Office and Procurator Fiscal Service)	2006 - 2010	UK	Public	<ul style="list-style-type: none"> <li>Two Edinburgh City Council employees (Owenson and Costello) and two directors of construction company Edinburgh Action Building Contracts Ltd (Balmer and Cantwell) were charged with bribery under the Public Bodies Corrupt Practices Act 1889 in connection with a contract relating to the maintenance of council buildings. The contract was allegedly awarded in return for extensive hospitality (including tickets to football matches, meals out and visits to lap dancing bars), and cash payments. Invoices were then inflated to cover the costs of the hospitality.</li> </ul>	<ul style="list-style-type: none"> <li>All defendants received significant custodial sentences.</li> <li>Owenson was sentenced to four years and four months' imprisonment.</li> <li>Costello was sentenced to three years and nine months' imprisonment.</li> <li>Balmer was sentenced to two years and ten months' imprisonment and disqualified from being a director for five years.</li> <li>Cantwell was sentenced to two years and three months' imprisonment and disqualified from being a director for five years.</li> </ul>	<ul style="list-style-type: none"> <li>The bribery scheme was uncovered in 2011 after a whistleblower raised concerns.</li> <li>The public officials received longer sentences because they were in a position of public trust.</li> <li>This case highlights the importance of robust controls around hospitality.</li> </ul>
<b>2014</b>							
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 Taiwan	Private	<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><u>Hungary bribery:</u></p> <ul style="list-style-type: none"> <li>In May 2015, further charges were brought by the SFO against Alstom</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> <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</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</li> </ul>



Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
					Network, Michael John Anderson and Jean-Daniel Lainé, for the alleged payment of bribes to win contracts for the supply of trains to the 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>deal. He was sentenced to four and a half years' imprisonment and ordered to pay £50,000 in costs.</p> <ul style="list-style-type: none"> <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> <li>(ii) compensation to the Lithuanian government of £10,963,000; and</li> <li>(iii) prosecution costs of £700,000.</li> </ul> </li> </ul> <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>	<p>prosecute him under a theory that he acted as an agent of a US subsidiary of Alstom SA that had engaged in bribery.</p> <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 was been dropped in Lithuania over a lack of evidence.</li> </ul>
Michael Boateng, Hakeem Adelakun, Moses Swaibu, Chann Sankaran, Krishna Sanjey Ganeshan and Delroy Facey (Sports match fixing)	UK (NCA)	2013	UK	Private	<ul style="list-style-type: none"> <li>Boateng, Adelakun and Swaibu, each of whom was previously a footballer at Whitehawk FC, allegedly accepted bribes for match-fixing, and were each charged with conspiring to commit bribery and an alternative charge of bribery.</li> <li>Sankaran and Ganeshan allegedly paid bribes to the three co-defendants, and were charged with conspiring to fix the outcome of matches and three alternative charges of bribery.</li> <li>Facey was allegedly a fixer who identified players who might be willing to take part in match-fixing. He was charged with conspiracy to commit bribery.</li> </ul>	<ul style="list-style-type: none"> <li>Boateng and Swaibu were found guilty of conspiracy to commit bribery and sentenced to 16 months' imprisonment.</li> <li>Sankaran and Ganeshan were found guilty of conspiracy to commit bribery and sentenced to five years' imprisonment each.</li> <li>Adelakun was cleared of involvement in the conspiracy.</li> <li>Facey was found guilty of conspiracy to commit bribery and sentenced to two and a half years' imprisonment.</li> </ul>	<ul style="list-style-type: none"> <li>All five men pleaded not guilty to the various charges at Birmingham Crown Court in March and sentences were handed down on 20 June 2014.</li> <li>The NCA commenced its investigation after being presented with evidence from an undercover reporter at the Daily Telegraph.</li> <li>The scheme, organised by Sankaran and Ganeshan, is said to have ultimately failed to influence any matches.</li> <li>These are the first convictions relating to match fixing in football since the 1960s and the first football related convictions under the Bribery Act 2010.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/ Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
<b>2013</b>							
Serco Geografix Limited (Public services, consumer industries)	UK (SFO)	2010-2013	UK	Public	<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>Serco Geografix reported these offences to the SFO in November 2013.</li> </ul>	<ul style="list-style-type: none"> <li>Under the terms of the three-year DPA, 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> </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.</li> </ul>
Sarclad Limited	UK (SFO)	2004 - 2012	Russia and India	Private	<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)	UK (British Transport Police and the CPS)	2010	UK	Private	<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</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 disqualified from being a director for eight years.</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</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
and Procurement)					<p>(a Costain Laing O'Rourke joint venture) responsible for health and safety at Farringdon rail station.</p> <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>	<ul style="list-style-type: none"> <li>(iii) John Zayya was sentenced to two years' imprisonment and disqualified from being a director for eight years.</li> <li>(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.</li> <li>(v) Kevin McKee was sentenced to 12 months' imprisonment on five counts to run concurrently and disqualified from being a director for eight years.</li> </ul>	<p>payments for "ghost workers" and for work that was never undertaken.</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	Mauritania, Ghana, Somaliland, Kenya, UK	Public	<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 £500,000, which were used to influence the award of business contracts to the company.</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 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.</li> <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>• This case is the SFO's first conviction of a corporate for foreign bribery, following a contested trial.</li> <li>• The Court applied the Sentencing Council Guidelines in deciding 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> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
						<ul style="list-style-type: none"> <li>The other defendants were acquitted.</li> </ul>	<ul style="list-style-type: none"> <li>S&amp;O was found to have made corrupt payments totalling £395,074.</li> </ul>
Besso Limited (Insurance)	UK (FCA)	2005 - 2011	UK and overseas jurisdictions	Private	<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	Private	<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 officials. JLTSL also failed to adequately implement its own anti-bribery and corruption policies.</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> <li>Analysis is available: "<a href="#">FCA enforcement action over firm's "unacceptable" approach of bribery risks</a>"</li> </ul>
James Whale, Gary West, Fung Fong Wong and Stuart Stone (Biofuels)	UK (SFO)	2011 - 2012	Cambodia	Private	<ul style="list-style-type: none"> <li>Four men connected with Sustainable AgroEnergy PLC were charged with fraud offences in connection with an SFO probe into the promotion of biofuel investment products to UK investors.</li> <li>Mr West, Mr Stone and Mr Wong were also charged with offences of making and accepting a financial advantage contrary to sections 1 and 2 of the Bribery Act 2010.</li> </ul>	<ul style="list-style-type: none"> <li>The defendants were sentenced at Southwark Crown Court on 08 December 2014.</li> <li>Mr West was convicted of two counts of bribery contrary to section 2 of the Bribery Act 2010, conspiracy to commit fraud by false representation, fraudulent trading and conspiracy to furnish false information. He was acquitted of one count of bribery contrary to section 1 of the Bribery Act 2010. He was sentenced to 13 years' imprisonment (including 6 years for bribery). He was disqualified from being a director for 15 years.</li> </ul>	<ul style="list-style-type: none"> <li>Mr West and Mr Stone are the first to be convicted of bribery under the Bribery Act 2010, following a prosecution brought by the SFO.</li> <li>The value of the alleged fraud was approximately £23 million.</li> <li>Analysis is available: "<a href="#">First charges brought by SFO under the Bribery Act</a>"</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
						<ul style="list-style-type: none"> <li>Mr Stone was convicted of two counts of bribery contrary to section 1 of the Bribery Act 2010 and conspiracy to furnish false information. He was sentenced to 6 years' imprisonment (including 4 years for bribery). He was disqualified from being a director for 10 years.</li> <li>Mr Whale was convicted of conspiracy to commit fraud by false representation and fraudulent trading. He was sentenced to 9 years' imprisonment and disqualified from being a director for 15 years.</li> <li>Mr Wong was acquitted of the charges against him.</li> </ul>	
Yang Li (University student)	UK (CPS)	2012	England	Private	<ul style="list-style-type: none"> <li>Mr Li, a student at the University of Bath, offered his tutor £5,000 to amend his dissertation grade, which was 3% short of a pass mark.</li> <li>The tutor rejected the offer, and as Mr Li put his money away, a replica air pistol fell out of his pocket and onto the floor.</li> </ul>	<ul style="list-style-type: none"> <li>Mr Li pleaded guilty in Bristol Crown Court to charges of bribery (under section 1 of the Bribery Act 2010) and possession of an imitation firearm.</li> <li>He was sentenced to 12 months in prison and ordered to pay £4,880 in costs.</li> </ul>	<ul style="list-style-type: none"> <li>This is the third conviction under the Bribery Act 2010.</li> <li>Judge Michael Longman stated that "any form of corruption or incitement to a person in any manner amounts to a serious offence which must be taken seriously by the court."</li> </ul>
<b>2012</b>							
Paul Jacobs, Bharat Sodha, Nidhi Vyas, Trevor Bruce (Oil and Gas)	UK (SFO)	2008-2009	Nigeria	Public	<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, had 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>	<ul style="list-style-type: none"> <li>The Swift Group co-operated with the SFO investigation and did not face criminal charges.</li> </ul>
Mawia Mushtaq (Taxi licensing)	UK (CPS)	2011	England	Public	<ul style="list-style-type: none"> <li>Mr Mushtaq was accompanied by a licensing officer from Oldham Council on a driving test for a private hire taxi licence.</li> <li>After being told he had failed the test, Mr Mushtaq offered the licensing officer bribes of £200 or £300 in exchange for a pass mark on his test. The licensing officer refused and informed his manager of the attempted bribe, who referred the matter to the police.</li> </ul>	<ul style="list-style-type: none"> <li>Mr Mushtaq was convicted of bribery under section 1 of the Bribery Act 2010 on 4 December 2012.</li> <li>He was sentenced to 2 months' imprisonment (suspended for 12 months).</li> <li>The judge also imposed a two-month curfew order between 6pm and 6am.</li> </ul>	<ul style="list-style-type: none"> <li>This is the second prosecution under the Bribery Act 2010.</li> </ul>
Paul Jennings David Turner,	UK (SFO)	1999-2007	Indonesia, Iraq	Public	<ul style="list-style-type: none"> <li>Four former directors of Innospec Ltd ("Innospec") were charged with</li> </ul>	<ul style="list-style-type: none"> <li>Mr Kerrison and Mr Papachristos were found guilty and were sentenced to three</li> </ul>	<ul style="list-style-type: none"> <li>Mr Jennings has already agreed to pay \$230,000 to the U.S. SEC</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/ Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
Dennis Kerrison, and Miltiades Papachristos (Chemicals)					<p>conspiring to bribe officials in Indonesia and Iraq, more than a year after the company was sentenced for related corruption offences (see details below).</p> <ul style="list-style-type: none"> <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>	<p>years and 18 months' imprisonment respectively.</p> <ul style="list-style-type: none"> <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>	<p>without admitting or denying the allegations that he had authorised the company to pay bribes.</p> <ul style="list-style-type: none"> <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>
Oxford Publishing Limited (Retail)	UK (SFO)	2007 - 2010	Tanzania, Kenya	Private	<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>

Name	Enforcement Jurisdiction	Year of offence	Country/ Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
John Maylam, David Baxter, Andrew Behagg (Retail)	UK (City of London Police)	2005 - 2007	UK	Private	<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>
James McGeown, William Marks, and John Symington (Security)	UK (SFO, Ministry of Defence Police)	1998-2004	Northern Ireland	Private	<ul style="list-style-type: none"> <li>Mr McGeown, the owner of VIS Security Solutions Ltd, obtained CCTV contracts worth a total of £16.2 million whilst he was paying bribes to civil servants Mr Marks (Deputy Senior Commercial Officer for the MOD) and Mr Symington (Senior Quantity Surveyor for the MOD).</li> <li>Mr Marks pleaded guilty to 11 counts of corruption, receiving £66,500 from Mr McGeown, and three counts of money laundering and Mr Symington pleaded guilty to 4 counts of corruption, receiving £18,000 from Mr McGeown.</li> </ul>	<ul style="list-style-type: none"> <li>The investigation concluded after all three defendants admitted their involvement.</li> <li>James McGeown was sentenced to 3 years' imprisonment (suspended) and was disqualified from being a director;</li> <li>William Marks was sentenced to 2 years imprisonment (suspended);</li> <li>John Symington was sentenced to 9 months' imprisonment (suspended);</li> <li>Confiscation orders were made against McGeown and Symington of £1 million and £24,550 respectively, payable within six months.</li> </ul>	<ul style="list-style-type: none"> <li>Their guilty pleas mark the conclusion of a joint investigation by the SFO and the MOD Police which began in 2002.</li> <li>At the time, then SFO Director Richard Alderman said, "<i>I welcome the verdict which sends a clear message to people who divert public money to their own ends that they must face the consequences.</i>"</li> </ul>
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	Private	<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	Private	<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 enforcement,</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/ Countries involved	Public /Private sector	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>	<ul style="list-style-type: none"> <li>encompassing investors who receive the proceeds of corporate crime through dividends.</li> <li>Analysis is available: "<u>Shareholder dividends and the Proceeds of Crime</u>"</li> </ul>
<b>2011</b>							
Victor Dahdaleh and Bruce Hall (Aluminium)	UK (SFO)	1998-2006	Bahrain	Private	<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 Bahrainian 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 Bahrainian 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 critical role, refused to testify in court.</li> <li>The judge instructed the jury to return "not guilty" verdicts on all counts against Mr Dahdaleh.</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>
Munir Yukib Patel (Civil Service)	UK (CPS)	2011	England	Public	<ul style="list-style-type: none"> <li>Mr Patel, a clerk at Redbridge magistrates' court, requested and received a bribe of £500 to alter the course of criminal proceedings relating to a motoring offence.</li> <li>He was charged under section 2 of the Bribery Act 2010, becoming the first person to be charged under the new legislation.</li> </ul>	<ul style="list-style-type: none"> <li>Mr Patel admitted committing an offence under section 2 of the Bribery Act 2010 and misconduct in a public office.</li> <li>This was the first conviction under the Bribery Act 2010.</li> <li>He was sentenced on 18 November 2011 to 3 years' imprisonment for the bribery offence and six years' imprisonment for misconduct in a public office, to be served concurrently.</li> </ul>	<ul style="list-style-type: none"> <li>Mr Patel was arrested after a newspaper filmed the incident.</li> </ul>
Willis Limited (Insurance)	UK (FSA)	2005-2009	Egypt, Russia and others	Private	<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</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</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</li> </ul>



Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
					appropriate steps to ensure that payments it was making to overseas third parties were not being used for corrupt purposes.	payment to an overseas third party made in the relevant period.	<p>reported to the Serious Organised Crime Agency.</p> <ul style="list-style-type: none"> <li>See the FSA Final Notice.</li> <li>Analysis is available: "<a href="#"><i>Willis: a familiar message, but a new audience?</i></a>"</li> </ul>
Macmillan Publishers Limited (Publishing)	UK (SFO, City of London Police)	2002-2009	Sudan, Rwanda, Uganda and Zambia	Public	<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> <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>£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> <li>MPL decided to cease all live and prospective public tenders in its Education Division business in East and West Africa.</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 procedures, appointing external consultants to recommend and help implement an appropriate anti-bribery and corruption compliance regime.</li> <li>Analysis is available: "<a href="#"><i>£11.2 Civil Recovery Order concludes Macmillan Publishers corruption case</i></a>"</li> </ul>
DePuy International Ltd (Medical instruments)	UK (SFO)	1998-2006	Greece	Public	<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> </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> </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>Analysis is available: "<a href="#"><i>Where now for Civil recovery Orders?</i></a>"</li> </ul>
MW Kellogg Ltd (Construction)	UK (SFO)	1994-2004	Nigeria	Public	<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> <li>The SFO recognised that MWKL was used by its parent company Kellogg,</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> <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,</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 become due to MWKL through the unlawful conduct.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
					Brown and Root (“KBR”) and was not a willing participant in the corruption.	agreeing to pay \$402 million to settle the bribery case.	
<b>2010</b>							
Andrey Ryjenko (Banking)	UK (CPS)	2007-2010	UK	Public	<ul style="list-style-type: none"> <li>In 2012 Andrey Ryjenko was charged with violation of the Prevention of Corruption Act 1906 for (i) accepting corrupt payments to introduce Chestnut Consulting Group to six eastern-European companies seeking loans from his employer, the European Bank for Reconstruction and Development, and (ii) to favour any applications made by the companies.</li> <li>Andrey Ryjenko received a share of the commission paid by the companies to Chestnut Consulting Group for successful loan applications.</li> </ul>	<ul style="list-style-type: none"> <li>On 06 June 2017 Andrey Ryjenko was convicted for the violation of the Prevention of Corruption Act.</li> <li>He was also convicted for money laundering the payments (\$3.5 million) into bank accounts in the name of his sister, who was also a defendant.</li> <li>On 20 June 2017 Andrey Ryjenko was sentenced to six years’ imprisonment for the corruption offence, and two years’ imprisonment for the money-laundering offence, with the sentences to run concurrently.</li> </ul>	<ul style="list-style-type: none"> <li>Andrey Ryjenko’s sister is due to be sentenced on 14 July 2017 under section 5 of the Criminal Procedure (Insanity) Act 1964 after she did not appear at trial due to a mental health condition.</li> <li>The owner of Chestnut Consulting Group, Dmitrij Harder pleaded guilty to violating the US Foreign Corrupt Practices Act by bribing Andrey Ryjenko in April 2017, and was sentenced in Philadelphia on 18 July 2017 to 60 months in prison and required to pay a \$100,000 fine in addition to forfeiting assets of \$1.9 million.</li> </ul>
Lynden Scourfield, David Mills, Alison Mills, Michael Bancroft, Tony Cartwright and Mark Dobson (Financial Services)	UK (CPS)	2003 - 2007	UK	Private	<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 wishes of the owners) and HBOS, under Scourfield’s influence, would extend further funds.</li> <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>	<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 conviction of five people on 30 January 2017.</li> <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> </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	Country/ Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
						<ul style="list-style-type: none"> <li>Tony Cartwright was convicted of fraudulent trading and conspiracy to conceal criminal property. He was sentenced to three and a half years' imprisonment.</li> <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	Public	<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> <li>Analysis is available: "<a href="#"><u>Jail sentence for senior executive confirms tough stance on bribery</u></a>"</li> </ul>
Paul Kent, Silinder Sidhu, John Ford, Rebecca Hoyle and Sarah Kent (Government funded training and education)	UK (SFO, West Mercia Police)	2003-2005	England	Public	<ul style="list-style-type: none"> <li>The defendants all worked at the Shropshire Office of the Learning Skills Council (LSC). Paul Kent was a senior officer involved in soliciting and evaluating tenders from the private sector.</li> <li>Paul Kent, together with Sidhu, a colleague, encouraged Hoyle, and Ford to apply for LSC contracts.</li> <li>Once LSC contracts had been corruptly secured and monies paid for them, Hoyle, Sidhu and Ford made corrupt payments to Paul Kent of just over £300,000 on contracts valued over £1.3 million.</li> <li>Sarah Kent worked at LSC. She was in a relationship with, and subsequently married, Paul Kent and benefited from his corruption.</li> </ul>	<ul style="list-style-type: none"> <li>Paul Kent pleaded guilty to corruption offences and obtaining a pecuniary advantage by deception and was sentenced to four years and six months' imprisonment.</li> <li>Sidhu was found guilty of corruption and was sentenced to three years' imprisonment.</li> <li>Ford pleaded guilty to making corrupt payments to Kent and was sentenced to two years' imprisonment.</li> <li>Hoyle pleaded guilty to corruption and was sentenced to one year's imprisonment.</li> <li>Sarah Kent pleaded guilty to money laundering offences and was sentenced to one year's imprisonment suspended for two years, 200 hours unpaid work and a 12 month supervision order.</li> </ul>	
Robert Dougall	UK (SFO, West Yorkshire Police)	2002-2005	Greece	Public	<ul style="list-style-type: none"> <li>Former DePuy Director of Marketing Robert John Dougall admitted his involvement in £4.5 million allegedly</li> </ul>	<ul style="list-style-type: none"> <li>Dougall received a 12 month suspended sentence.</li> </ul>	<ul style="list-style-type: none"> <li>Dougall pleaded guilty and cooperated with the SFO.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
(Medical instruments)					<ul style="list-style-type: none"> <li>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>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>Judge warned against agreements as to sentencing between the SFO and defendants.</li> </ul>
Innospec Ltd (Chemicals)	UK (SFO)	1999-2006	Indonesia	Public	<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> <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>	<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> <li>Analysis is available: "<a href="#"><i>Innospec Limited – a severe setback for the SFO's fight against overseas corruption</i></a>" and "<a href="#"><i>Where now for Civil recovery Orders?</i></a>"</li> </ul>
BAE Systems plc (Defence and aerospace)	UK (SFO)	1999	Tanzania Investigation covered Kingdom of Saudi Arabia, Romania and South Africa	Public	<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> <li>Analysis is available: "<a href="#"><i>BAE sentencing</i></a>" and "<a href="#"><i>BAE Tanzania settlement – "To whom do I make it payable?"</i></a>"</li> </ul>
<b>2009</b>							
AMEC (Construction)	UK (SFO)	2005-2007	South Korea	Public	<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>

Name	Enforcement Jurisdiction	Year of offence	Country/ Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
Mabey & Johnson (Construction)	UK (SFO)	1993-2001	Ghana, Jamaica and Iraq	Public	<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 (FSA)	2005-2007	Bahrain, Vietnam, Bangladesh and Burma	Private	<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	Public	<ul style="list-style-type: none"> <li>Failure to keep accurate business records in accordance with section 221 Companies Act 1985.</li> <li>Inaccurate records related to payments made by a subsidiary during construction of The Bibliotheca Project in Alexandria, Egypt.</li> </ul>	<ul style="list-style-type: none"> <li>£2.25 million civil recovery order.</li> </ul>	<ul style="list-style-type: none"> <li>BB self-reported to the SFO immediately upon discovery of the irregularity and accepted unlawful conduct had taken place.</li> </ul>
CBRN (Security)	UK (City of London Police, CPS)	2007	Uganda	Public	<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>
Nigel Heath, Shinder Singh Gangar and Adam White (Law and Accountancy)	UK (SFO, Leicestershire Police ECU)	1999-2002	UK, USA	Public	<ul style="list-style-type: none"> <li>Gangar and White were accountants who had run a high yield investment fraud promoted through their accountancy firm. The firm had an arrangement with an American company whereby the accountancy firm 'invested' substantial sums of money with the American company. The SEC had obtained a freezing order, which had included these funds.</li> <li>Heath, a solicitor, then conspired with Ganger and White to bribe an unnamed official in the U.S. Judicial Department and/or US Attorney General to cause those monies to be unfrozen. The bribe</li> </ul>	<ul style="list-style-type: none"> <li>Gangar and White were found guilty of conspiracy to defraud and conspiracy to corrupt. Both received seven and a half years imprisonment and were disqualified from being company directors for 12 years.</li> <li>Nigel Heath pleaded guilty to conspiracy to commit corruption and received six months imprisonment.</li> </ul>	<ul style="list-style-type: none"> <li>Heath was also struck off by the Law Society in 2007 on the basis of these dealings.</li> </ul>

Name	Enforcement Jurisdiction	Year of offence	Country/ Countries involved	Public /Private sector	Summary of offence	Result	Additional facts
					was to be \$500,000, but was never carried out.		

For further information please contact Nick Benwell, Stephen Gentle, Camilla de Silva or your usual contact at Simmons & Simmons.

© Simmons & Simmons LLP and its licensors. All rights asserted and reserved. This document is for general guidance only. It does not contain definitive advice. Simmons & Simmons LLP is a limited liability partnership registered in England & Wales with number OC352713 and with its registered office at CityPoint, One Ropemaker Street, London EC2Y 9SS, United Kingdom. It is authorised and regulated by the Solicitors Regulation Authority and its SRA ID number is 533587. The word "partner" refers to a member of Simmons & Simmons LLP or one of its affiliates, or an employee or consultant with equivalent standing and qualifications. A list of members and other partners together with their professional qualifications is available for inspection at the above address.