ORDINE DEI DOTTORI COMMERCIALISTI E DEGLI ESPERTI CONTABILI
MILANO

FONDAZIONE COMMERCIALISTI ODCEC di MILANO

SCUOLA SUPERIORE SANT'ANNA PISA

LA RESPONSABILITÀ AMMINISTRATIVA DEGLI ENTI NELLA DIMENSIONE TRANSNAZIONALE. LA COMPLIANCE, EX D.LGS. 231/2001, TRA OBBLIGO E OPPORTUNITÀ

RACE TO ZERO CORRUPTION: GOLD STANDARDS, BREAKING BIASES AND INNOVATIVE TOOLS

THE BUSINESS PERSPECTIVE

NICOLA ALLOCCA

RISK, BUSINESS INTEGRITY, RESILIENCE AND QUALITY DIRECTOR AT **AUTOSTRADE PER L'ITALIA**
CHAIR OF THE **BUSINESS AT OECD** ANTICORRUPTION COMMITTEE
CO-CHAIR **B20 BRAZIL** "INTEGRITY & COMPLIANCE" TASK FORCE

23 febbraio 2024

STRAIGHT TO THE POINT

Today I would like to convey the **sense of urgency** and the **responsibility** we must have in fighting this **global cross cutting issue** in this liquid, modern world

AGENDA

1. **BREAKING BIAS EXERCISE**
2. **LEADING INSTITUTIONS** in the fight against corruption
3. Overview of THE **"ZERO CORRUPTION" MANIFESTO** for a new SDG

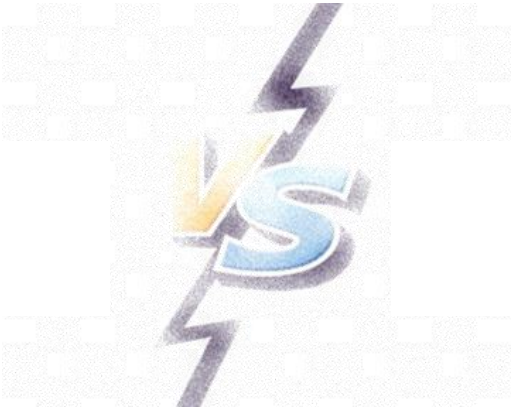
#BREAKINGBIAS

MINIMIZE
THE IMPACT OF THE DISEASE

VS

ERADICATE
THE DISEASE

MANAGE
CORRUPTION RISK



ELIMINATE
CORRUPTION RISK

IMPACT OF CORRUPTION IN EUROPE

CORRUPTION	904 BILLION € / YEAR

WHAT COULD WE DO WITH IT ?

1	ELIMINATE WORLD HUNGER	229 BILLION € / YEAR
2	PROVIDE DRINKING WATER GLOBALLY	129 BILLION € / YEAR
3	PROVIDE FREE HEALTHCARE IN THE POOREST COUNTRIES	259[1] (data from 2018: 115) BILLION € / YEAR
+	ADDITIONAL RESOURCES LEFT	287 BILLION € / YEAR

THE SOCIAL IMPACT OF CORRUPTION…

… IS GOOD ENOUGH REASON TO START OUR RACE TO ZERO

SOURCE> THE COSTS OF CORRUPTION ACROSS THE EUROPE: https://www.greens-efa.eu/files/doc/docs/e46449daadbfebc325a0b408bbf5ab1d.pdf

[1]SOURCE> OXFAM: https://www.oxfamitalia.org/wp-content/uploads/2020/05/BRIEFING_PAPER-Tutto-laiuto-necessario_final.pdf

OUR CO-PILOTS IN THE RACE TO ZERØ

OECD

CONVENTION ON COMBATING BRIBERY OF FOREIGN PUBLIC OFFICIALS IN INTERNATIONAL BUSINESS TRANSACTIONS

and Related Documents

BUSINESS at OECD

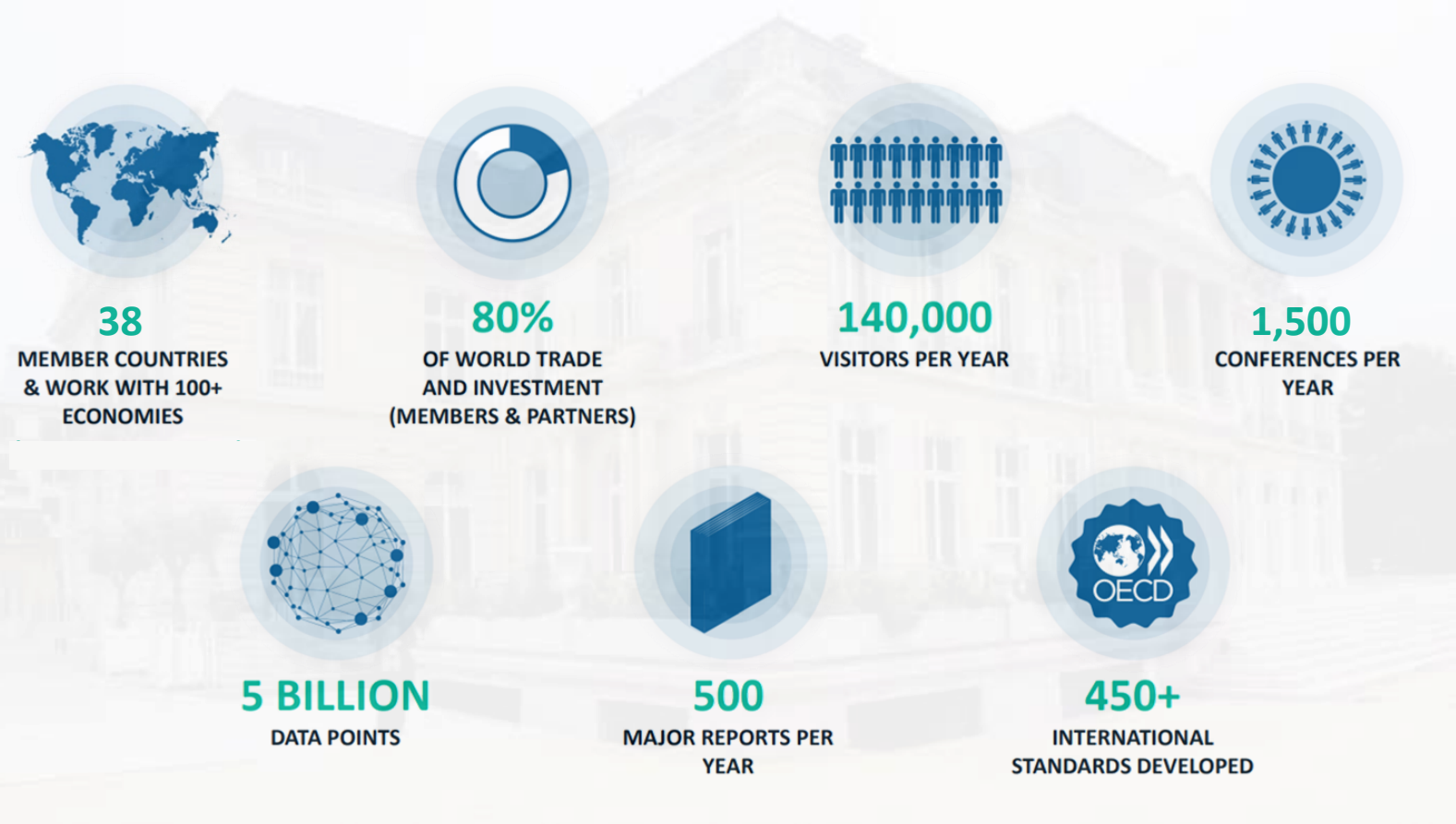
Business at OECD (BIAC)

Anti-Corruption Committee

THE OECD

A LEADING INSTITUTION IN THE FIGHT AGAINST CORRUPTION

The **Organisation for Economic Co-operation and Development (OECD)**, established in 1961, is an international organisation in which governments work together to find solutions to common challenges, develop global standards, share experiences and identify best practices to promote better policies for better lives.



OECD anticorruption instruments:

→ OECD Anti-Bribery Convention and following Recommendations,

→ OECD Guidelines on Anti-Corruption and Integrity in State-Owned Enterprises, MNEs, etc.

→ Plus research and analysis, including on the demand side of bribery and corruption in state-owned enterprises (SOEs)

ANTIBRIBERY CONVENTION AT A GLANCE

The **OECD Anti-Bribery Convention** is one of the most important tools to combat international bribery.
It establishes **legally binding** standards to criminalise bribery of foreign public officials in international business transactions.

IMPLEMENTATION ROADMAP

1997 / 99

Signature of the OECD Antibribery Convention, which entered into force in 1999 (By 44 Parties)

Objective: help governments to:

- pass new laws,
- strengthen their existing regulations
- foster effective enforcement.

It focuses exclusively on the **Supply Side of bribery**

> **Before the OECD Anti-Bribery Convention was signed in 1997, there was no effective multinational framework for the prevention and prosecution of bribery.**

2009

Revision of the recommendation: "Further combating bribery in International Business Transactions"

Objective: enhance the ability of Parties to prevent, detect, and investigate foreign bribery.
In particular, new topics regard:

- provisions for combating small facilitation payments;
- protecting whistle-blowers;
- communication between public officials vs law enforcement authorities
- Good Practice Guidance on Internal Controls, Ethics and Compliance (Annex II)

2021

Revision of the recommendation

Objective: enhance the ability of parties to address challenges, good practices and cross-cutting issues that have emerged in the global anti-corruption landscape since 2009.
In particular, new topics regard:

- Addressing the **Demand Side of Foreign Bribery** Cases;
- Sanctions and Confiscation;
- Non-Trial Resolutions;
- International Co-operation;
- Protection of Reporting Persons;
- Incentives for Compliance;
- Data Protection.

Accelerator for the use of digital technology in compliance

BUSINESS AT OECD

THE BUSINESS VOICE IN THE FIGHT AGAINST CORRUPTION

Established in 1962, *Business at OECD* (BIAC) is the **institutional stakeholder for business to the OECD** providing expertise to ensure competitive economies and a pro-business policy environment

BUSINESS AT OECD (BIAC)

10M+

Businesses in OECD countries and beyond

2800+

Business representatives that include small businesses and entrepreneurs, national industry and employer organizations, and multinational corporations.

60M+

Business **employees** represented

45+

National Business Organizations from all OECD Member Countries

10+

National Business Organizations from non-OECD economies

29

BUSINESS AT OECD ANTICORRUPTION COMMITTEE

Policy groups/ committees that shape public policy through engagement in OECD at leadership and policy group levels

+280

Policy submissions per year to the OECD to highlight key business messages

BUSINESS AT OECD ANTICORRUPTION COMMITTEE

THE SUBJECT MATTER EXPERT IN THE FIGHT AGAINST CORRUPTION

BUSINESS AT OECD (BIAC) ANTICORRUPTION COMMITTEE

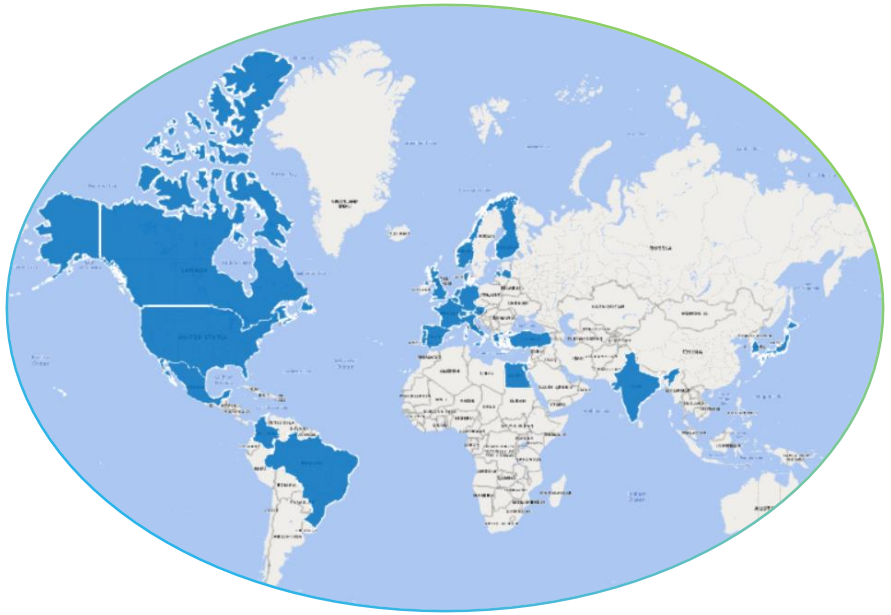
Brings together **business integrity and anti-corruption experts** (e.g. lawyers, auditors, compliance mgrs., etc.) from a range of different sectors in order to:

Relevant OECD Fora

- contribute the **business voice to the OECD Working Group on Bribery,** the **OECD Anti-Corruption and Integrity Forum** and other relevant OECD meetings which deal with the issues of bribery and corruption.
- support **OECD efforts**:
  - to fight bribery and corruption,
  - to foster integrity and
  - to ensure a global level playing field.

B20 «Integrity & Compliance» TF

- Furthermore, it contributes actively to the **B20** Integrity & Compliance task force



30+ Countries

130+ Members

BUSINESS @ OECD ANTICORRUPTION COMMITTEE

THE SUBJECT MATTER EXPERT IN THE FIGHT AGAINST CORRUPTION

BUSINESS AT OECD (BIAC) ANTICORRUPTION COMMITTEE

- **Chair:** Nicola Allocca, Autostrade per l'Italia (Italy)
- **Vice-Chairs:** Snam (Italy), Amber Beverage Group (Latvia), Novartis (Switzerland), Deloitte (United States), Schneider Electric (France), Nilfisk (Denmark), Rolls-Royce-Civil Aerospace (Germany)
- **Policy Manager:** Benedikt Wiedenhofer (France)

Call for action → contact us if interested in joining!

LATEST DELIVERABLES OF THE ANTICORRUPTION COMMITTEE

We are contributing to the development of the convention and its recommendations, trying to anticipate and focus on EMERGING TRENDS, such as:

DIGITAL TECHNOLOGIES

STEPPING UP THE GAME: DIGITAL TECHNOLOGIES TO PROMOTE THE FIGHT AGAINST CORRUPTION

EDUCATION

SHAPING THE VALUES FOR A SUSTAINABLE FUTURE – EDUCATION FOR THE FIGHT AGAINST CORRUPTION"

ZERO AS A TARGET

"ZERO CORRUPTION" MANIFESTO FOR A NEW SDG

TODAY FOCUS

MANIFESTO "ZERO CORRUPTION" FOR A NEW SDG

Context of reference

WHY WE ISSUED THE MANIFESTO

The benefits from zero corruption have a positive impact on the achievement of other SDGs

I. **Call to action**: we need an urgent action plan.
Businesses need to develop a long-term vision which considers both **planet challenges and opportunities**.
In this regard **corruption is a global cross-cutting issue** that we must face together to guarantee a sustainable future and progress on long-term challenges.

II. **Vision switch**: we must have the courage to admit that **it is possible to eliminate corruption** and we must have the intellectual honesty to give this target a proper dignity in the **UN SDG Agenda**.

III. **Momentum**: experiences of the pandemic, geopolitical crisis, VUCAL world accelerate **our race to zero**

DEDICATED CAMPAIGN WILL BE LAUCHED IN MARCH 2024 IN THE OCCASION OF THE 25° ANNIVERSARY OF THE OECD ANTIBRIBERY CONVENTION

MANIFESTO "ZERO CORRUPTION" FOR A NEW SDG

Context of reference

WHAT ARE THE MAIN FEATURES

I. **Sources**: Based on OECD standards and best practices:
   - **OECD Anti-Bribery Convention**, 2009 and 2021 Recommendation
   - **OECD Guidelines** on Anti-Corruption and Integrity in State-Owned Enterprises, MSMEs, MNEs, etc.

II. **Multistakeholder**: It can be supported by **public** and **private** organizations, **corporations** and **business** representatives.

III. **Bias breaking**: It has the ambition of breaking **cultural barriers** and it will be one of the main instruments to **sponsor the 18th SDG**.

DEDICATED CAMPAIGN WILL BE LAUCHED IN MARCH 2024 IN THE OCCASION OF THE 25° ANNIVERSARY OF THE OECD ANTIBRIBERY CONVENTION

MANIFESTO "ZERO CORRUPTION" FOR A NEW SDG

Context of reference

STRUCTURE OF THE MANIFESTO

#10 ACTIONS clustered in 3 groups

1. **CHANGING THE WAY WE THINK ABOUT CORRUPTION**
2. **CREATING MEANINGFUL TOOLS AND TAKING IMPACTFUL MEASURES**
3. **ACTING TOGETHER GLOBALLY**

DEDICATED CAMPAIGN WILL BE LAUCHED IN MARCH 2024 IN THE OCCASION OF THE 25° ANNIVERSARY OF THE OECD ANTIBRIBERY CONVENTION

MANIFESTO

How can we "TRANSLATE COMMITMENT INTO ACTION TO IMPACT"?

DEDICATED CAMPAIGN WILL BE LAUCHED

RACING TO ZERØ

1 Breaking biases that corruption cannot be eliminated

HUM

2 Corrupti an rights, contributing to an abu

CROSS CUT

3 The benefits from zero corruption have a positive impact on the achievement of other SDGs

CHANGING THE WAY WE THINK ABOUT CORRUPTION

MANIFESTO

How can we "TRANSLATE COMMITMENT INTO ACTION TO IMPACT"?

DEDICATED CAMPAIGN WILL BE LAUCHED

1 RACING TO ZERØ

Breaking biases that corruption cannot be eliminated

2 HUMAN RIGHTS & ANTICORRUPTION

Corruption is a crime that can also undermine human rights, contributing to an abusive and unrespectful ecosystem

3 CROSS CUTTING ISSUE

The benefits from zero corruption have a positive impact on the achievement of other SDGs

4 ST

De within any context s vital

5 INCENT

Supp speak up and take chologically safe environment

6 PROMOTE FREEDOM OF PRESS

Press ur society by ur media)

7 TECH FOR

Techno corruption. It is critic pliance solutions, using a build-block approach

CREATING MEANINGFUL TOOLS AND TAKING IMPACTFUL MEASURES

CREATING MEANINGFUL TOOLS AND TAKING IMPACTFUL MEASURES

Ø /ZÈ·RO/ CORRUPTION

MANIFESTO

How can we "TRANSLATE COMMITMENT INTO ACTION TO IMPACT"?

DEDICATED CAMPAIGN WILL BE LAUCHED

1 RACING TO ZERØ
Breaking biases that corruption cannot be eliminated

2 HUMAN RIGHTS & ANTICORRUPTION
Corruption is a crime that can also undermine human rights, contributing to an abusive and unrespectful ecosystem

3 CROSS CUTTING ISSUE
The benefits from zero corruption have a positive impact on the achievement of other SDGs

4 STIMULATE RESPONSIBLE CONDUCT
Developing a culture of integrity, transparency, and ethics within any context, any entity, any government, any jurisdiction is vital

5 INCENTIVATE & PROTECT BRAVE VOICES
Support and defend individuals that have the courage to speak up and take actions towards a different direction, ensuring a psychologically safe environment

6 PROMOTE FREEDOM OF PRESS
Press can help in the fight against corruption and protecting our society by uncovering the truth and providing transparency (vigilant media)

7 TECH FOR TRUST AND TRANSPARENCY
Technology is becoming a gamechanger in the fight against corruption. It is critical to seize the opportunities coming from digital compliance solutions, using a build-block approach

8 THINK GLOBAL AND ACT LOCAL ("GLOCAL")
Actions and behaviors we manifest locally have to be inspired by a global vision, respecting the peculiarities of local contexts (i.e. SMEs)

9 ZERØ T
Strive fo n within all jurisdictions

10 COLLECTIVE ACTIONS FOR A MULTISTAKEHOLDER APPROACH
Establishing trustworthy relationships between corporations, governments, institutions etc. is crucial to maximize the contribution in the "race to zero" and to level the playing field

ACTING TOGETHER GLOBALLY

BUSINESS at OECD

THE ESSENTIAL TRUTH ABOUT #ZEROCORRUPTION

1. **The race to zero corruption is a great responsibility.**
2. **We must give "zero corruption" proper dignity in the UN SDG Agenda.**
3. **It is possible to eliminate corruption, but it takes courage.**
4. **This is practical and necessary step towards a resilient and sustainable real economy.**

THE ESSENTIAL TRUTH ABOUT #ZEROCORRUPTION

IT'S ON — Ø corruption is happening

IT'S US — Together we can make it happen

IT'S A MUST — There is no plan B

What if every company implemented the Manifesto?

OUR AMBITION

Supply-Side of Bribery addressed!

AUTOSTRADE GROUP AT A GLANCE

Autostrade per l'Italia is one of the biggest European motorway operators, belonging in the infrastructure industry. 2 years ago we started a transformation program to become an integrated operator of sustainable mobility.

INTEGRATED OPERATOR OF SUSTAINABLE MOBILITY

ASPI Group Overview

- Autostrade per l'Italia ("ASPI") operates one of the **largest toll motorway concession assets in Europe and in in Italy**[1], constituting c.50% of the Italian toll motorway system
- **ASPI** holds the Group's primary concession, operating **2,855 km** of toll motorways in Italy and its subsidiaries manage **further 165 km** of toll roads under five different concessions managing the arteries connecting Northern to Southern Italy
- Other companies within the Group supply services related to its core motorway activities
- ASPI derives c.90% of its revenue from tolls paid by users of its network
- Secondary sources of revenue comprise royalties from the 218 service areas and other activities
- Integrated business model (design, construction, operation and technology) to ensure timely execution of capex plans, operational excellence and innovation toward a sustainable and "smart" infrastructure transformation.

Key Figures

€3,196MM 2020 Revenue	€947MM 2020 EBITDA[2]	€372MM 2020 FCF[3]
€2,823MM 9M21 Revenue	€1,506MM 9M21 EBITDA	€939MM 9M21 FCF[3]

Autostrade per l'Italia Km of network: 2,855 Concession expiry: 2038	**Società Autostrada Tirrenica**[4] Km of network: 55 Concession expiry: 2046	**Raccordo Autostradale Valle d'Aosta** Km of network: 32 Concession expiry: 2032
Società Italiana per il Traforo del Monte Bianco Km of network: 6 Concession expiry: 2050	**Tangenziale di Napoli** Km of network: 20 Concession expiry: 2037	**Autostrade Meridionali**[5] Km of network: 52 Concession expiry: 2012

Network operated by ANAS and other operators

Key Data

- 3,020 km motorway network
- ~4 MM clients per day
- ~2.5 MM vehicles per day
- 16 toll motorway stretches
- 634 tunnels for a total of 422 Km of tunnels
- 271 toll booths, 218 service areas
- 2,097 Bridges and Viaducts of +10 metres length

ABOUT US: OUR CORRUPTION RISK TRIGGERS

We are planning to **spend 21,5 bln €** in investment and maintenance with an **inductive effect** on the Country economy of around **65 bln€** **+** We are planning to **hire +2900 professionals** by 2024 **=** **need to strengthen the Internal Control System**

THE COMPANY THROUGH TWO NUMBERS

2020 - 2038

+ 21,5 bln €

8,5 bln € will be realized by 2024

14.5 €billion[5]
Investiments

+

7 €billion
Maintenance

with an **inductive effect** on the Country economy of around **65 bln€**

2020 - 2024

+ 2.900

New hires planned

Read these numbers through my lens, as senior executive in charge for risk, fraud, anticorruption, and quality programs. It strongly increases corruption risk exposure…

TRACING THE COMPLIANCE FOOTPRINT WITHIN THE INDUSTRIAL PLAN

…and for this reason we have defined a specific program called **"Next to Legality"** within our strategic plan, including all the initiatives that aim at upgrading the internal control system.

THE COMPLIANCE "FOOTPRINT"

ASPI Transformation Plan

- next to Digital — Transformation network in "smart" infrastructure
- next to People — Induction program and employees on-boarding
- next to Active safety — Safety Academy
- next to Legality — **Strengthening of the Internal Control System**
- next to Knowledge — Partnership with university excellence
- next to Transformation — Communication and information transformation
- next to Excellence — Ensure operational excellence

next to Legality

Focus on Next to Legality

1. CORPORATE #RESPONSIBLE BUSINESS CONDUCT

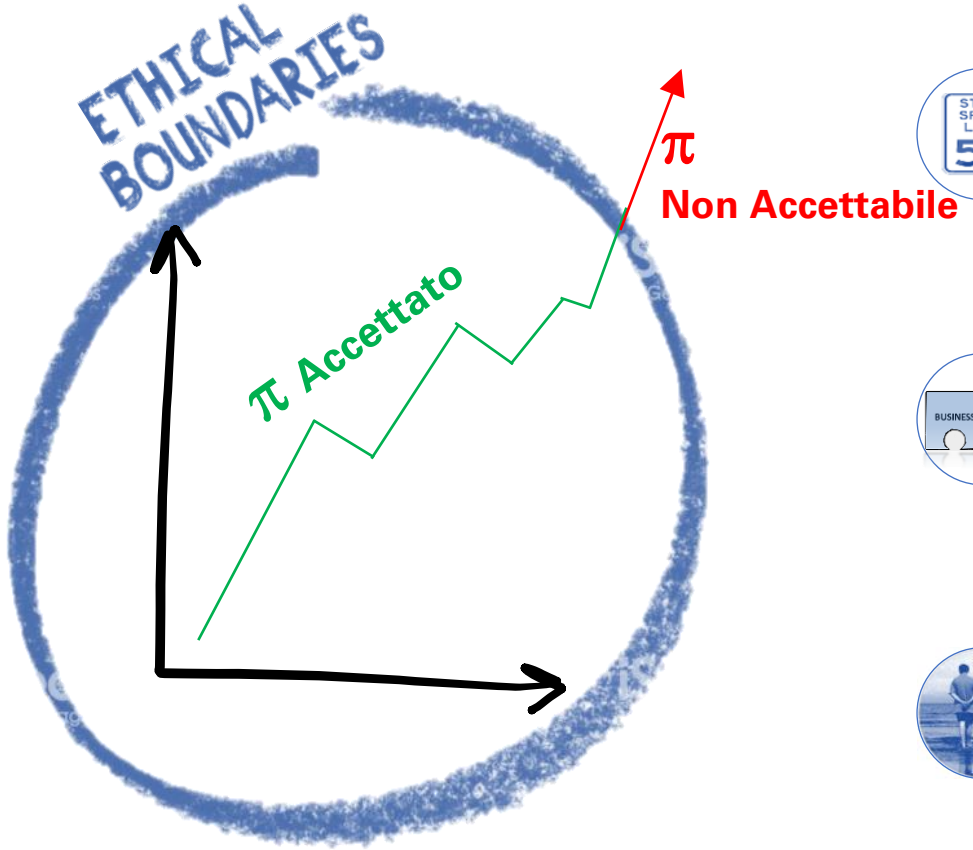
2. #NO SHORTCUT

3. #SMART MONITORING

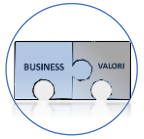
The program is based on OECD, B20, Transparency International and other fora **best practices**. The program is based, of course, on the Manifesto.

#RESPONSIBLE BUSINESS CONDUCT

I.
CORPORATE
#RESPONSIBLE
BUSINESS CONDUCT



π ∈ ETHICAL BOUNDARIES



∄ TRADE OFF TRA

1. **Performance** vs **Compliance**
2. **Risultati** vs **Regole**
3. **Business** vs **Valori**

RUOLO SOCIALE DELLE IMPRESE

SMART MONITORING

Smart Monitoring Solutions are enablers for the improvement of processes, systems and controls, through data optimization/sharing and a new way of working.

NEW WAY OF FIGHTING CORRUPTION

27

TIME TO WRAP UP

THE PILOTS IN OUR RACE TO ZERO

Governments and Institutions

1. **Level Playing Field + Collective Actions**
2. Increase **transparency** and **efficiency** of **Public Administrations**
3. **Rewarding mechanisms** for virtuous companies
4. **Incentives** for using modern **technology in compliance** ("Industry 4.0")

Private Sector

1. **Responsible Business Conduct**
2. **Clear rules with fair application**
3. **Smart Monitoring** solutions

28

THE NEW FRONTIER OF TECHNOLOGICAL SOLUTIONS

GENERATIVE ARTIFICIAL INTELLIGENCE

It is not the same as Artificial Intelligence

"Generates **original content** without the need for structured and complete data."

It is advancing rapidly

Le soluzioni che abbiamo implementato oggi **sono già obsolete**

It requires new competences

+ Reskilling
+ Upskilling
+ Change management

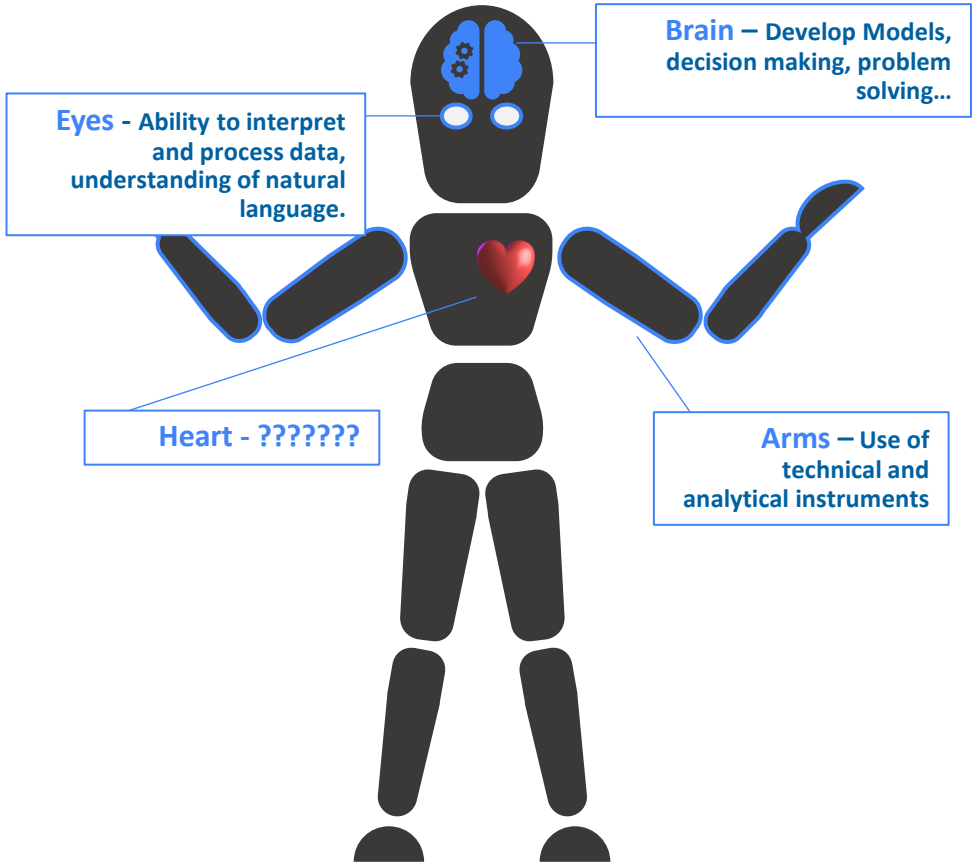
It changes the vision on internal control

+ Quality
+ Speed
+ Integration

Focus: GENERATIVE AI

"It is not a tool that increases compliance capacity..."

...but he is a new colleague with brains, eyes and arms



$$E = Q \times A$$

KEY SUCCESS FACTORS FOR **COMPLIANCE EFFECTIVENESS**

EFFECTIVENESS OF ANTICORRUPTION SOLUTIONS

E = Q x A		
Quality	**x**	**Acceptance**
1. **Multidisciplinary team** with Data Analytics Expertise, Process Expert, Risk Expert 2. Allocation of financial resources from **Budget** 3. **Availability and reliability of data** in conjunction with evolved systems 4. **Mature internal control system level** 5. **Reporting with tailored approach**, appropriate to target audience		I. **Value to business processes** by making them more simple, effective and adherent to the specific context II. Internal and external **communication** III. **Top management perspective** IV. **Reduction** of number **of controls**
Commitment		
Trust		
Culture // Breaking Bias		

UNCONVENTIONAL COMMUNICATION

Autostrade per l'Italia has designed and adopted an **innovative, unconventional** and effective **way** of **communicating** with managers, using simple and direct messages ("**Brain-Gut Communication**"). Below are some examples:

EXAMPLES OF UNCONVENTIONAL COMMUNICATION

Legality Days

Compliance pills: Integrity Pack

Examples of unconventional communication

KEY SUCCESS FACTORS

FROM MECHANISM TO ORGANISM

NO SILOS APPROACH

NO DO-IT-YOURSELF (SELF-ASSESSMENT)

NEW SKILLS

1. **Multiskills team**
   (es: data scientists, engineers, statistics, IT…)
2. Enable **Synergies**
3. **Homogenize** language

KEY FIGURES & STAKEHOLDERS

FIGHTING FOREIGN BRIBERY IN FIGURES

THE ACTORS

44
PARTIES TO THE ANTI-BRIBERY CONVENTION

TOGETHER, THEY COVER...

81%
OF GLOBAL OUTBOUND FDI STOCKS

AND OVER...
66%
OF THE WORLD'S EXPORTS

AND ARE HOME TO...
95
OF THE LARGEST
100
NON-FINANCIAL MULTINATIONAL ENTERPRISES

AND TO ALL OF THE TOP
50
FINANCIAL MULTINATIONALS
These companies are therefore all subject to laws that criminalise foreign bribery.

THE PROCESS

THE OECD WORKING GROUP ON BRIBERY monitors Parties' compliance with the Convention and promotes better anti-bribery laws and enforcement. Its activities include:

20
YEARS OF PROMOTION AND MONITORING OF ANTI-BRIBERY LAWS AND ENFORCEMENT ACTIVITY,
including, for the past decade, meetings of law enforcement officials from the 44 Parties

200+
MONITORING REPORTS
covering the 44 Parties' foreign bribery laws and enforcement practices and activities

4
PHASES OF MONITORING
PHASE 1
Design of anti-bribery law
PHASE 2
Legislative and practical implementation
PHASE 3
Enforcement and cross-cutting issues
PHASE 4
Outstanding issues and tailor-made analysis

1500+
RECOMMENDATIONS FOR IMPROVING ANTI-BRIBERY LAW AND ENFORCEMENT
Most recommendations have been fully or partially implemented. Those that are judged not to be fully implemented are subject to follow up by the OECD Working Group on Bribery.

KEY DATES

17 DECEMBER 1997
Signature of the Convention

15 FEBRUARY 1999
Adoption of Recommendation for Further Combating Bribery of Foreign Public Officials

9 DECEMBER 2009
Signature of Recommendation for Further Combating Bribery of Foreign Public Officials

18 FEBRUARY 2010
Adoption of the Good Practice Guidance on Internal Controls, Ethics, and Compliance

THE RESULTS

BROADER AND IMPROVED LAWS

BRIBERY IS NOW A CRIME IN ALL
44
PARTIES TO THE CONVENTION

44
COUNTRIES HAVE STRENGTHENED OR CREATED CORPORATE LIABILITY LAWS
in compliance with commitments made under the Anti-Bribery Convention. These laws allow them to hold companies, not just individuals, liable for foreign bribery.

0
COUNTRIES EXPLICITLY PERMIT TAX DEDUCTIBILITY OF BRIBES

AT LEAST
29
COUNTRIES ELIMINATED TAX DEDUCTIBILITY OF BRIBES
in order to comply with their obligations under the Convention.

18
COUNTRIES HAVE INTRODUCED OR STRENGTHENED WHISTLEBLOWER PROTECTION
in response to peer evaluation reports and recommendations.

ENFORCEMENT

560
INDIVIDUALS AND
184
ENTITIES HAVE BEEN SANCTIONED
under criminal proceedings for foreign bribery in
23
PARTIES
between the time the Convention entered into force in 1999 and the end of 2015.

AT LEAST
102
INDIVIDUALS AND
247
ENTITIES IN
11
COUNTRIES HAVE BEEN SANCTIONED
for other offences related to foreign bribery, such as money-laundering or accounting.

500
INVESTIGATIONS ARE ONGOING IN
30
COUNTRIES

146
INDIVIDUALS AND
9
ENTITIES ARE SUBJECT TO ONGOING PROSECUTIONS IN
11
COUNTRIES
for offences under the Convention.

21
COUNTRIES HAVE YET TO CONCLUDE A FOREIGN BRIBERY ENFORCEMENT ACTION