

Anti-Corruption / FCPA | AT A GLANCE

OVERVIEW

Shearman & Sterling's anti-corruption experience began in 1976 during the investigation into Lockheed Aircraft Corporation's foreign marketing practices. Pursuant to a consent decree, the SEC appointed our Chief of Litigation as a Special Counsel in that matter, and the investigation, together with the report we generated, was an impetus to the FCPA's adoption in 1977.

Since that engagement, Shearman & Sterling has played a leading role in many major investigations and in developing anti-corruption compliance procedures. We provide a wide range of anti-corruption services to clients throughout the world, including:

- Anti-corruption compliance programs design and implementation
- Anti-corruption controls audits
- Due diligence on third-party agents
- FCPA independent compliance monitors
- FCPA review requests
- Government investigations (DOJ, SEC, non-U.S. authorities)
- Internal investigations
- M&A due diligence
- Parallel civil litigation

REPRESENTATIVE ENGAGEMENTS

The Anti-Corruption Practice Group has represented parties in many of the largest investigations involving potential violations of the FCPA and the anti-corruption laws of other countries, including:

- Advising **GlaxoSmithKline** on bribery investigation in China and related matters.
- Representing **Norsk Hydro** in connection with an investigation arising out of the merger of its oil and gas activities with Statoil Hydro.
- Representing **Volvo Group** in SEC and DOJ proceedings arising from the "Oil for Food" Investigation.
- Representing **ABB Ltd.** and its upstream oil and gas subsidiaries in SEC and U.S. criminal investigations in connection with the subsidiaries' marketing practices in 103 countries. The investigation led to civil and criminal prosecutions arising out of events in Nigeria, Angola and Kazakhstan.
- Representing various parties in the SEC and DOJ investigations of **Titan Corporation**, **Daimler AG**, the **Bonny Island Nigeria** matter, **Faro Technologies, Inc.**, **Oil States International, Inc.**, **Magyar Telekom**, and **Talecris**.

PRACTICE CONTACTS

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The firm has played a leading role in designing and implementing new anti-corruption compliance programs, as well as auditing and updating existing compliance programs for clients in the United States and throughout the world. Representative matters include:

- Advising **Nokia Oy** in a multi-jurisdictional compliance review involving Siemens AG, Nokia's joint venture partner in Nokia Siemens Networks.
- Acting as **Independent Monitor** for Baker Hughes and York International pursuant to DOJ deferred prosecution agreements and SEC consent orders mandating reviews of each company's compliance programs.
- Advising **a major U.S. financial institution** in self-disclosure to OFAC and compliance program revamping related to Cuba.
- Advising **a global auction company** in AML and sanctions compliance program development.
- Advising **an international manufacturer** in developing a global sanction compliance program.

All of our team members continuously deepen their expertise through an active exchange among our integrated global platform and engagement on compliance matters in other areas, such as setting up or enhancing existing compliance management systems, and conducting compliance due diligence on M&A matters. Representative matters include:

- Providing anti-corruption training for the Norwegian oil company, **Statoil**, and the Crown Prince's Court for the Emirate of Abu Dhabi.
- Developing and implementing global compliance programs including anti-corruption matters for **Nokia Siemens Networks** and **PWC Logistics**, a fast-growing Middle East-based company.
- Conducting a targeted compliance review of a subsidiary of **a large multinational defense and logistics company**.

ACCOLADES

Ranked No. 6 in the inaugural GIR 100, a guide to the world's best firms for international investigations.
— *Global Investigations Review*, 2015

Recognized by Main Justice with a Distinguished Service Award in the Elite Practice of the Year category for FCPA at the 2013 Main Justice Awards.

"[C]alled upon most often for its experience and acumen with matters of the securities and white-collar and FCPA enforcement variety."
— *Benchmark Litigation*, 2016

Team members are acknowledged as a "first-rate FCPA practitioner" and for bringing "a lot of experience to the table and gives practical, as opposed to conceptual, advice: not just on the textbook issues, but on how you translate them into the day-to-day operations of a business."
— *Chambers USA*, 2014

"FCPA is a mainstay of the practice."
— *Legal 500*, 2014

Shearman & Sterling "is best known for its FCPA investigations and compliance work, which is 'really, really great'."
— *Legal 500*, 2013

Three out of the seven "Best FCPA Lawyers" outside of the Beltway.
— *mainjustice.com*, 2011

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REPRESENTATIVE CLIENTS

ABB Ltd.

Baker Hughes

Bechtel Corporation

Daimler AG

GlaxoSmithKline

Nokia Oy / Nokia Siemens Networks

Norsk Hydro

Statoil

Titan Corporation

Volvo Group