



Global Anti-Corruption Investigations & Compliance Services



Anti-corruption enforcement activity is increasingly global. Companies must comply with international anti-bribery laws or risk severe penalties while facing growing public expectations of good ethical behavior and pressure from stakeholders to improve results.





FTI Consulting's global anti-corruption, investigations and compliance practice is dedicated to conducting anti-corruption risk assessments and establishing effective monitoring programs.

What We Do

We help companies identify jurisdictions, business areas, and transactions that present higher potential compliance risk. We then develop and implement testing and monitoring regimens, tailored to each client, including any third-party partners.

FTI Consulting is uniquely qualified to help our clients stay in compliance with the FCPA, the UK Bribery Act and other global anti-corruption laws. We assist clients in navigating all aspects of anti-bribery and corruption risk. With significant experience in the highest profile DOJ prosecutions and SEC enforcement actions, no other firm can match our depth of expertise in every facet of compliance and investigations, including due diligence, risk assessment, compliance program development, and forensic review.

We have the expertise to unravel the most complex financial transactions, perform fact-gathering, reconstruct records, trace the movement of assets, identify internal control weaknesses and recommend remediation tactics.

We lead investigations into the facts and circumstances as well as the financial data to assist companies in avoiding or mitigating risk in their operations or business transactions and in determining who knew what and when relating to internal corruption, fraud or other corporate events. We concurrently offer industry leading electronic evidence services that identify, preserve and collect relevant information and analyze complex data within enterprise systems.

Our Professionals

Our independent practice includes former "Big 4" auditors, forensic accountants, former federal and state prosecutors, former regulators, former law enforcement officials, investigative researchers, and computer forensic and data analytic specialists.

With offices throughout world, including professionals with multilingual capabilities, FTI Consulting has the ability to offer comprehensive anti-bribery and corruption related services wherever needed.

— ADDRESS, MITIGATE AND/OR RESOLVE FOREIGN CORRUPTION



Proactive

Assessing and mitigating corruption risks as part of a compliance program or significant business transaction



Reactive

Investigating corruption allegations, information preservation & production, data analytics, and responding to government requests as needed



Remediation / Monitoring

After an event, participating in reporting to government agencies, developing programs to remedy existing policy & procedure shortfalls, and monitoring & testing to ensure effectiveness of remedies



Training

Review, design and deliver in-house training programs



CASE STUDY

Global Anti-Corruption Pre-Transaction Risk Assessment Due Diligence

On behalf of a major United States passenger air carrier operating in over 50 countries on six continents, FTI Consulting performed pre-transaction bribery and corruption risk assessments in anticipation of the company's acquisition of several regional passenger air carriers located throughout Latin America.

FTI Consulting's assistance involved the acquisition and review of the target carriers' local language policy and procedure documentation pertaining to anti-bribery and anti-corruption systems and programs. In addition to the policy reviews conducted, FTI Consulting conducted interviews of relevant company personnel to further understand the existing controls in place to prevent and detect instances of bribery and corruption.

FTI Consulting also performed selected transaction testing, targeted to the business transactions that are traditionally more susceptible to bribery and corruption risks. The work performed included data analysis to identify the higher risk transactions, selection of a sample of transactions for testing and the accumulation and review of local language documents supporting the transactions tested.

Our work resulted in the identification of gaps in the internal controls and existing bribery and corruption risks within the target's operating companies in Brazil and Colombia. Our findings were presented to the company's in-house compliance and transaction teams. For the work performed, FTI Consulting utilized personnel located in our offices in the United States and Latin America.



CASE STUDY

Global Anti-Corruption Consulting

After an FCPA enforcement action was brought by United States and foreign regulators, a global telecommunications services company turned to FTI Consulting to conduct in-country bribery and corruption investigations and risk assessments, as well as internal controls evaluation and remediation.

Our work included an analysis of the profits from contracts that regulators deemed to have been awarded pursuant to the payment of impermissible benefits to government officials. Critical to the success of the work was our use of professionals located in our offices throughout Europe and Asia, with appropriate language and technical fraud capabilities.

We also designed and implemented bribery and corruption risk assessment testing protocols across the company's local operating companies in countries throughout eastern Europe, central Asia and north Africa. The risk assessments included the identification and evaluation of existing bribery and corruption risks through targeted transactional testing and employee

interviews conducted in-country. Additionally, FTI Consulting assisted the company in identifying and evaluating other fraud risks that may have existed within its local operating companies including risks of fraudulent financial reporting and risk surrounding the physical security of assets.

FTI Consulting also reviewed and evaluated existing internal controls and tested their operational effectiveness using process walkthroughs, gap identification and the development of remedial enhancements.

FTI Consulting was able to efficiently and effectively incorporate the results of the prior work into the scoping and in-country transactional testing protocols so as to avoid unnecessary replication of the work performed and to leverage prior findings and observations into our risk assessment activities.

We presented the results of our analysis of profits to regulators both in the United States and foreign regulatory agencies.



CASE STUDY

Global Pharmaceutical Anti-Corruption Investigation

FTI Consulting was retained by outside counsel to a multinational pharmaceutical company to investigate whistleblower allegations of improper payments made by sales representatives in China. FTI Consulting investigated over five years of employee expense reimbursements related to thousands of employees. FTI Consulting designed a methodology to risk-rank the activities of the sales force over the period of review, which counsel used to determine which employees should be interviewed. In addition,

FTI Consulting reviewed expenses related to speaker fees, conferences, sponsorships, grants, training expenses and charitable contributions to determine if the expenses posed additional anticorruption risk. FTI Consulting's procedures included assisting counsel with forensic accounting procedures, structured data analytics, and investigative research. FTI Consulting's findings were presented to the DOJ and SEC, as well as to the external auditors and the board of directors.

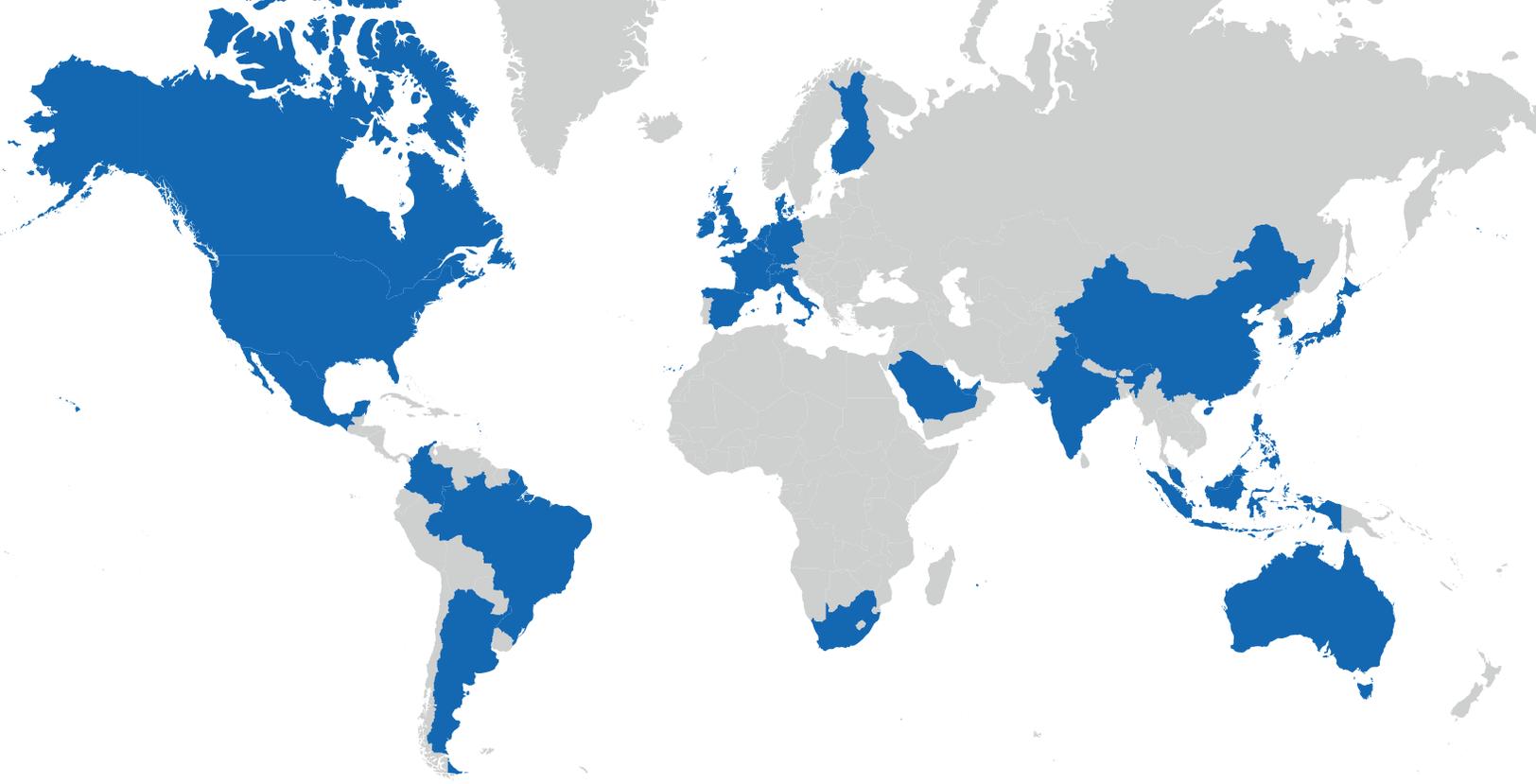


CASE STUDY

Global Anti-Corruption and Pre-Acquisition Risk Assessment

FTI Consulting has been engaged since September 2010 by a global science and technology manufacturing company to perform proactive anti-corruption risk assessments for multiple wholly-owned subsidiaries in high-risk countries such as Brazil, Russia, Italy, India, China, Mexico, Turkey, and South Africa. FTI Consulting's procedures included conducting hundreds of interviews of in-country personnel and performing detailed testing of thousands of revenue and expense transactions to assess the potential level of corruption and bribery risk at each location. In many instances, we worked closely with general counsel and

internal audit personnel and as a result of the risk assessment findings in one operating company, FTI Consulting worked with outside counsel to perform a more thorough anti-corruption investigation which included a reputational due diligence review of certain third parties. In addition to the risk assessments and investigation, FTI Consulting assisted internal audit in the development of its anti-corruption audit program and interview templates. We also performed pre-acquisition due diligence reviews to determine the adequacy of anti-bribery controls and compliance culture for several significant pending acquisitions.



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With offices in every major financial center and every corner of the globe, we successfully serve our clients wherever challenges and opportunities arise.

Our clients include Fortune 500 corporations, FTSE 100 companies, global banks, major and local law firms and state and national governments and agencies in the U.S. and other countries. In addition, major U.S. and international law firms refer us or engage us on behalf of their clients.

31

Countries

1982

Year Founded

7,700+

Employees

NYSE:FCN

Publicly traded

Top 50

Advisor to the world's top 50 bank holding companies

99/100

Advisor to 99 of the world's top 100 law firms

\$6.2B

Equity Market Cap*

82/100

82 of Fortune Global 100 corporations are clients

*Number of total shares outstanding as of April 20, 2023, by the closing price per share on April 20, 2023.



Definitive Expertise



Consulting Firm of the Year (2016-2021); Most Experts Named to the **Consulting Experts Guide** (2016-2022)



Best Firm to Work For (2018-2022)



Investigations Digital Forensics Firm of the Year (2021-2022); and **Arbitration Expert Firm of the Year** (2015-2022)



#1 Expert Witness Firm on GAR 100 Expert Witness Firms' Power Index (2023)



Marketing/PR Firm of the Year (2021-2023)



#1 U.S. Restructuring Advisor (2008-2022)



Global Turnaround Consulting Firm of the Year (2015-2019, 2021-2022)



One of **America's Best Employers for Women and New Graduates** (2022); One of **America's Best Management Consulting Firms** (2016-2022); **World's Best Management Consulting Firms** (2022)



Leader on the **Chambers Crisis & Risk Management Guide** (2022); and the **Chambers Litigation Support Guide** (2021-2022)

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