

A BRIEF COMPARISON OF THE ANTI-CORRUPTION LAWS OF CERTAIN JURISDICTIONS AND THE INSIGHTS FOR THE DEVELOPING ONES

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ABSTRACT

Corruption has many forms. In the age of rapid expansion and growth, companies need to deal with the diverse legal provisions of different countries as well as international legal provisions in order to successfully establish a new business or to adapt to the new trends of any jurisdiction. The lack of coherent research has caused a legal vacuum in this regard. As a result, companies are struggling to conduct business in various jurisdictions around the world and are facing a challenge to know the veracious legal provisions of so many jurisdictions. The USA, UK, France, Brazil, and South Korea are some of the big economic powers where companies are keen to expand their business but in doing so, they face complicated legal challenges dealing with corruption. Also, there are countries like Bangladesh with a totally exceptional socio-economic environment and unique legal structure where the corporations conduct their business. There are also challenges regarding extra-territorial jurisdiction in the case of bribery where some of these countries are capable of adjudicating a company or related third party even if the corruption has occurred outside its territory. There is a difference in case of nature of adjudication as both civil and criminal cases can be administered in case of corruption in a different jurisdiction. Anti-corruption compliance and effective implementation of such could not only be able to defend the company from various adverse legal effects but also it could minimize the cases of corruption within the company profiting it in the long term. Also, before expanding business to a new country or consolidating its existing position, the companies need to take certain measures such as a code of conduct, ensuring a transparent environment, and hiring the right employees and third parties are all recommended for corruption-free growth of a company. By fulfilling all the conditions, a company can effectively expand its business and grow its profits.

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INTRODUCTION

The existence of corruption can be traced back as far as ancient Rome (Bhagwan, 2007). But the modern world with its economic and technological growth has found itself in an era where corruption is rampant but the means to counter corruption have never been so many. Corruption is the biggest hindrance in the way of sustainable development goals. Especially, the developing and poor countries are the biggest sufferers of corruption. It has been reported that in developing countries like Paraguay, a poor family has to give 12.6% of their earnings to corrupt people whereas that is 6.8% for the richer part of the country (Masud and Kim, 2019). And, in this era of globalization when corporations are often conducting business in jurisdictions where laws and policies are different from one another, the company officials and the third parties must know the general rules related to anti-corruption of the jurisdictions. The existing works of literature on the subject matter have depicted how corruption negatively influences the company's overall growth as well as destroys the overall economy of the country (Lopatta et al., 2017). Prior studies related to anti-corruption laws have received significant attention from scholars and stakeholders. However, there are only a handful of studies regarding the comparative aspect of corruption. However, there are certain international standards like the OECD Anti-Bribery Convention, which are globally maintained while making anti-corruption laws and policies. So, it is essential to understand the general trends of the international and local anti-corruption legal provisions. In this paper, the existing anti-corruption provisions of six different countries, namely: (a) the US Foreign Corrupt Practices Act 1997 ("US Act"), (b) the UK Bribery Act 2010 ("UK Act"), (c) France's Sapin II 2016 ("French Act"), (d) Brazil's Clean Companies Act 2014 ("Brazilian Act"), (e) South Korea's Kim Young Ran Act 2016 ("South Korean Act") and (f) Bangladesh's Anti-corruption mechanisms have been discussed. The jurisdictions are selected based on their overall economic and legal system strength, where there are comparatively developed countries and, in the end, a least developed country, selected from different geopolitical locations. There has been an attempt to define the key concepts and identify the nature of jurisdiction, the acts that constitute bribery, and the acts that do not. Again, common trends within these laws and a suggestion have been drawn by the General Legal Counsel in the analysis part so that the laws could easily be followed to avoid any legal complications on the ground of corruption. And a conclusion has been drawn on the subject matter. Now, before jumping into the main discussion, let's discuss some key concepts.

CONCEPTS DEFINED

The foremost concept related to anti-corruption law is the concept of jurisdiction. Jurisdiction means the official power to apply laws and to make official decisions regarding a party. So, the foremost condition of coming under the jurisdiction of a certain country is to create some sort of connection with the territory of that country. Again, there are specific acts that are prohibited, and doing so would result in committing an offence. Although such acts might slightly vary in respect of the elements from country to country there are common acts that have been identified in the latter part of the paper. Another important concept is the code of conduct of the company. A code of conduct refers to a policy document that incorporates all the general principles, mission, and vision, and permitted and prohibited behaviour of the company employees and the third parties. One could easily describe the ethical compass of a company from its code of conduct. And upon the code of conduct, anti-corruption compliance is built. Compliance refers to the mechanism that conforms to any specific legal provision, rule, policy, or standard. The aim of compliance is to deter wrongdoers by punishing them. It reflects the company's goodwill to obey the law. Also, it saves the company from bigger legal hassles. Now we will be discussing the nature of jurisdiction in the above-mentioned six countries regarding anti-corruption law.

NATURE OF JURISDICTION

In the USA, the US State Department is the anti-corruption authority. The US Act suggests unlawful actions, such as offering, paying, or promising to pay money or anything of value enough to establish the jurisdiction of the US anti-corruption courts over foreign entities (DOJ, 2020). Apart from offering a bribe, any company may be subject to US Anti-Corruption law if it is listed on any US stock exchange, incorporates into any US state, and commits an act of bribery. (Mendelsohn, et al., 2021). In the UK, both active bribes, as well as passive bribery, have been criminalized under The Bribery Act 2010. The Serious Fraud Office (SFO) and International Crime Unit (ICU) are the entities that investigate within British jurisdiction and The Crown Prosecution Service (CPS) prosecutes any incident of bribery. Under the law, failure to prevent bribery also makes a company fall under the British anti-bribery jurisdiction. Also, a British company remains under the jurisdiction of British anti-bribery authority even if it commits an act of bribery outside British territory. Furthermore, if a British company does not have adequate compliance in place and the particular incident of bribery has taken the benefit of such a vacuum of adequate compliance, then it would constitute a link to make the

company fall under British jurisdiction. Even local customs of various forms of bribes will not curtail British jurisdiction over the company under The Bribery Act 2010. stipulated the conduct need not have occurred within the UK rather even if the relevant features occurred outside UK's territorial jurisdiction, then the company might fall under the UK's jurisdiction. (MOJ, 2011). Under the French Act, *Agence Française Anticorruption* (AFA) is the agency responsible for preventing corruption in France. The anti-corruption jurisdiction connection will be established to French territory over companies if they conduct any of their activities within France. Also, if corruption activities occur outside of French territory by French citizens related to the company, whether in an official position or as a third party, they will fall under French jurisdiction (Dentons, 2017). The connection will be established if any act of bribery occurs to give business benefit to any such company. (OECD, 2014). The Brazilian Act also supports such a notion of connection. Incidents of bribing the Public Administration in any foreign territory for unfair business gain have also been seen as connected to the jurisdiction of Brazil (OECD, 2017). The Office of the Comptroller General enforces jurisdiction on anti-corruption matters and has the power to The Brazilian Act extends the jurisdiction to foreign companies with registered offices in Brazil if they commit acts of bribery. In South Korea, the Anti-corruption and Civil Rights Commission is the jurisdiction issuing authority for anti-corruption matters. any of the 14 types of solicitation by any foreign entity would be considered as the connection to establishing anti-corruption jurisdiction in South Korea (Kang, et al., 2017). Also, corruption through a representative, agent, or employee of a corporation creates the connection that establishes jurisdiction of the South Korean Act in connection with the business of the company, its representatives, and officials even if such an act is committed outside of South Korea (DOJ, 2020). In Bangladesh, the Anti-corruption Commission of Bangladesh is the main anti-corruption authority (Sakib, 2019). Also, there is no special law to deal with all kinds of bribery, yet the specialized Anti-corruption Commission Act 2004 has given the commission power to take action against corrupt acts in both corporate and non-corporate sectors (Ahmed, 2007). The instances of bribery and their punishments are also dealt with under the Penal Code 1860 and Anti-Money Laundering Act 2012 and through the various rules and regulations promulgated by the various government and non-government authorities (Ahmed, 2007). There is no special provision incriminating foreigners for corruption in any law of Bangladesh however the Penal Code has extended the jurisdiction of Bangladeshi courts over foreigners for extra-territorial offences (Rashid, 2006). The local and multinational corporations (private organizations) generally adopt their own compliance policy keeping into consideration the applicable Anti-Bribery and Corruption Laws, applicable Anti-Money

Laundering laws, and applicable Sanctions and Export Control Laws and laws relating to Contract in Bangladesh.

WHAT ACTS CONSTITUTE BRIBERY AND WHAT NOT?

The countries vary in the regulations regarding what is accepted and what is prohibited as gifts. Under the US Act, certain items such as modest food, and non-alcoholic refreshments, such as coffee, donuts, tea, and soft drinks can be exchanged with foreign officials (DOJ, 2020). Commercial package offers and discounts that are available for the general public can also be offered to and accepted by foreign public officials. Foreign officials can attend free events if there are opportunities to provide information on behalf of their organizations. They can also take meals, gifts, and lodging if it is provided for the general people. However, more than 100 persons must attend such an event, and a gift of such attendance must not exceed the market value of \$415 (DOI, 2022). In the UK, there is a Gifts and Hospitality policy to safeguard foreign officials from allegations under the UK Act. Foreign officials are allowed to accept nominal gifts valued at less than £50 but the aggregated value of such gifts cannot exceed £200 in a calendar year (NIH, 2021). In France, the French Anti-Corruption (AFA) agency has specific guidelines for foreign officials. Any benefit in the form of cash is prohibited for them (OECD, 2014). Also, the guideline prohibits gifts that might affect the fair decision-making process. Brazil has a diversified set of rules to prevent foreign corruption. It is allowed to gift a foreign public official if the MNC has no interest in decisions made by such officials. (Deffenti, 2022). South Korea has a stricter policy toward gifts to foreign public officials. Even small gifts can be considered a bribe under the South Korean Act (Chang, Chang and Freese, 2001). However, gifts that are customarily given under specific circumstances are allowed. But no gift or hospitality can exceed KRW 30,000 or approximately \$30. Even cash gifts on occasions like funerals or weddings cannot exceed KRW 50,000 or approximately \$50. Money or flowers to greet or condole a foreign official cannot exceed KRW 100,000. However, no gift can be provided to influence a public official's discretionary power (Park, 1995). In Bangladesh, government officials are permitted to accept gifts, but they are required to submit gifts to the government treasury that cross a certain price limit. Also, gifts of historical value are mandatory to submit to the government treasury (Jani, 2020). The price limit for the Prime Minister and President is BDT 50,000, for the speaker of the Parliament BDT 30,000, and all other officials must submit any gift that is valued over BDT 5,000 to the government treasury (Jani, 2020).

EXCEPTIONS OF MINOR PAYMENT

None of the statutes we have discussed in this memo allows public officials to receive minor payments from corporations. But gratitude might be expressed in the form of small gifts. In the USA which value must not exceed \$20 every time and must not exceed \$50 in a single calendar year or from a specific source. Also, the public officials can be awarded but the award price must be within \$200. And the award must be bonafide (DOJ, 2012). Also, in the UK, foreign officials are allowed to accept nominal gifts valued at less than £50 but the aggregated value of such gifts cannot exceed £200 in a calendar year (NIH, 2021). But French officials are not allowed to take such gifts or hospitality as the law does not permit any limit for such. So, it is best to avoid offering gifts and hospitality to French public officials. However, the Brazilian approach is quite liberal in this regard. Public officials are entitled to enjoy gifts and hospitalities from corporate entities (Deffenti, 2022). So, they can be gifted as gratitude, but such gifts and hospitality must not be given to influence their decision in the corporation's favour. The case of South Korea is the most delicate one and the corporations must be prudent while offering gifts to public officials. Corporates have ample opportunity to impress public officials in official events but that must be with a bonafide intention. In Bangladesh, government officials are permitted to accept gifts and services that value less than BDT 5000. But such not be as an exchange of any service or in promise to do any service for the corporate entity paying (Jani, 2020).

NATURE OF LEGAL CONSEQUENCE AFTER VIOLATION

In most countries, corruption is a criminal offence. In the USA, most cases of corruption under the US Act are treated as criminal offences and could even result in imprisonment and fines of up to \$500,000 for corporations (Day, 2010). However, individuals might be subject to civil suits for corruption of any company-related unfair practice and petty matters (DOJ, 2012). In the UK, bribery is considered a serious criminal offence, and individuals might face up to 10 years of imprisonment. Unlike the USA, even failure to prevent bribery is also considered a criminal offence in the UK and might result in sanctions like suspension of business, and fines. Also, in France, bribery is considered a criminal offence, and individuals guilty of corruption might face imprisonment of up to 10 years and a fine of up to €1 million. Bribing judicial officials is considered a more serious offence and might result in up to 15 years imprisonment and a fine of €225,000. There can also be disbarment of public procurement and seizure of assets (Rancourt, 2021). But in the case of corporations, the fines are five times that of a natural

person and the penalties include dissolution of the corporation, banning from conducting business within French territory, public announcement of the illegal conduct, and damaging reputation (Barda, 2020). Brazil usually does not consider corporate hospitality towards public officials as an offence. However, the provisions under the Brazilian Act regarding gifts and hospitality must be followed strictly during the exchange of any such gift or hospitality (McKenie, 2022). Otherwise, the corporations might face criminal offence. Not implementing proper compliance programs would also result in criminal proceedings against the corporations. In South Korea, bribery is considered a serious criminal offence. The corporation must strictly implement proper compliance programs. Avoiding most forms of gift exchange between corporations and officials is prudent. However, the corporations might show some creativity during official events in order to impress the officials but not with an intention to influence any decision on their part that might help their business gains. In Bangladesh, if government officials do not submit gifts that are valued above BDT 5000 then it would be regarded as corruption (Jani, 2020). Also, even if they accept a gift valued less than BDT 5000 in exchange for any service or in promise to do any service for the corporate entity paying then such a gift would be regarded as a bribe (Jani, 2020). In such instances, departmental action is taken against the entity as per the government's official rule book. Also, depending on the gravity of the offence, the government official and the corporate entity would face investigation by the Anti-corruption Commission, which would result in the corporate entity's license revocation as well as its officials might face criminal imprisonment up to a life sentence subject to the gravity of the offence (Rahman, 2019).

DEFENCE OF EFFECTIVE COMPLIANCE PROGRAMS

Compliance programs are an important defence against corruption in most cases. The US Act does not make it mandatory for a company to have an effective compliance program for detecting and preventing corrupt practices. However, finely constructed and properly implemented compliance programs help companies to avoid any vicarious liability regarding their employee's misconduct. US Act does not consider every single violation of the US Act as a failure to a company's compliance and having an effective compliance program benefits the company by giving them a strong ground for negotiation as most of the cases tend to ultimately enter into a deferred Prosecution Agreement (DPA) or Non-Prosecution Agreement (NPA). The US policy is to facilitate the continuity of businesses. So, the US jurisdiction is quite liberal and ultimately only the very serious offences get prosecuted. Having efficient

compliance symbolizes the corporations' good intentions to fight combat and to ensure an environment of accountability (DOJ, 2012). In the UK, it is also a major defence for corporations having a well-established compliance policy (Bühr and Seitz, 2020). The organizations may not suffer any consequence if they can prove that they have undertaken adequate measures to prevent their employees or any third person from doing any illegal activity. However, the compliance programs must be up to date and demonstrate reasonable effectiveness (MOJ, 2011). Also, under the French Act, the companies are required to have an updated compliance plan. Failure to demonstrate the proper implementation of compliance might even result in a financial penalty of up to 1,000,000 (Stamboulidis, Hannon and Carpenter, 2016). So, in France, it is beneficial to have an effective compliance program to avoid penalties. Brazilian Act permits a similar approach of defence for having an effective compliance program. Brazilian Act requires regular assessment of compliance programs and auditing of the procedural integrity of such programs (Castro, Amaral, and Guerreiro, 2018). In case of violation of anti-bribery law, the company may be immune because of the existence of a strong compliance program. So, it is a must for corporations to know about the compliance standards as well as the local legal provisions to conduct business activity in Brazil. In South Korea, corporations can avoid vicarious liability through effective compliance programs. Even if the laws are liable to them vicariously, they can demonstrate that they have adequately discharged the duty of supervising the employees. In Bangladesh, an effective compliance program also provides the company defence against conviction in corruption cases (Rahman and Khatun, 2017). Bangladeshi Companies Act 1994 recognizes the concept of the corporate veil and if the accused company could prove that there was an effective compliance program for preventing corrupt activity then the liability falls upon the accused company official and not upon the company itself (Rahman and Khatun, 2017). Therefore, in most cases, the existence of a well-developed compliance program is recommended for corporations to be safe from corruption liabilities.

CORRUPTION IN BANGLADESH

Bangladesh has seen gradual economic growth and turned from an experimental case of development to a middle-income country in the year 2021 and Bangladesh is expected to be promoted from the Least Developed Country (LDC) list by the year 2026 (Byron and Mirdha 2021). Although the notion of middle-income countries and developing countries are frequently used to mean the same by the political authority, the distinction remains in

associated policies with each of the concepts (Bhattacharya and Khan, 2018). It was reported by the Centre for Policy Dialogue (CPD) that it would have been appropriate to consider Bangladesh a middle-income economy from the year 2015 (Bhattacharya and Khan 2018). It was also depicted in the report that considering only the income factor is not appropriate for apprehending a country's economic strengths and weaknesses (Bhattacharya and Khan 2018). There might be countries with strong national income levels, yet such countries might be considered LDC because of various socio-political vulnerabilities (Bhattacharya and Khan 2018). LDC status enables countries to receive export benefits such as duty-free or quota-free access to developed economies with easy rules to export their goods. Bangladesh has seen high exports because of various bilateral and multilateral trade preferences that come with its LDC status (Rahman 2014). The country highly depends on ready-made garments (RMG) to earn its foreign currency which constitutes around 20% but this might be challenged after promotion from LDC (Rahman 2019). Scholars have urged Bangladesh to upgrade existing technologies and implement labour standards to meet the challenges of LDC graduation (Byron and Mirdha 2021; Rahman 2019). However, the LDC graduation reflects Bangladesh's socio-economic progress and the drastic reduction of the poverty rate from 83% in 1975 to 20.5% in 2019 (Byron and Mirdha 2021). Bangladesh has been identified as one of the fastest-growing economies of the last decade yet there are still challenges regarding infrastructure, slow investment, income inequality, poor quality of education, weak monitoring, and poor accountability and transparency (Bhattacharya and Khan 2018). Corruption in various sectors like land administration, law enforcement, judiciary, customs, energy, power sector, and so on has made the existing problems more severe and the anti-corruption efforts are also highly politicized in the country (Repucci and Slipowitz, 2021). According to TIB (2021), "the law enforcement agencies are the most corrupt service sector (74.4%) followed by the Department of Immigration and Passports (DIP) (70.5%) and Bangladesh Road Transport Authority (BRTA) (68.3%). Other most corrupt services sectors include the judiciary (56.8%), health (48.75), local government institutions (46.6%), and land services (46.3%)" (UNB, 2021). However, there are regulatory frameworks like the Money Laundering Prevention Act 2012 and various rules to prevent money laundering in Bangladesh. Also, to prevent terrorism there is the Anti-Terrorism Act, 2009, and rules like Guidelines on Prevention of Money Laundering & Combating Financing of Terrorism by the Bangladesh Financial Intelligence Unit to prevent terrorism financing through corrupt actions like money laundering. Also, there is the Anti-corruption Commission Act 2004 constitutes an independent Anti-corruption Commission for Bangladesh. Yet, the country still lacks a special law dedicated to identifying and penalizing

all sorts of bribery. Also, the weak institutional arrangements are making the situation dire. As a result, the country is facing a high corruption environment.

ANALYSIS

Corruption is a serious offence. The common trend that can be found from the above discussion is that the crime of corruption is punished severely in the six jurisdictions of our discussion. Even if the crime is committed outside the territory of any particular country, then the nationality of the offender or any link mentioned above can also make the person or company triable under the law of most countries. Also, almost all the countries have prohibited any direct payment to the officials and consider it a bribe. However, a close examination of the provision provides us with the loopholes. A company's ultimate intent is to make a profit. In a situation where a company has started business in a new country, it generally has to compete with other companies that already have established business operations in the country. So, there is a need to advertise and promote the new company and its product. But the strict interpretation of the anti-corruption laws might be a hindrance to that. However, if the company can identify what actions are permitted in a jurisdiction while promoting a business and if it can make the most use of such permitted means then it might be able to achieve its aim of establishing a name and a solid business operation in the new territory. Another important aspect of the discussion that can be taken is that even company-related third parties must be made accountable by the company. As the conduct of the third party also creates a vicarious liability toward the company, the third parties must also be aware of the rules regarding anti-corruption. Also, they must be made accountable under the compliance system of the company. Also, the company must be ready with effective procedures for dealing with suspected incidents of corruption while conducting business in the above territories. Again, in the case of countries like Bangladesh, the corporations must bear in mind the high corruption risk indexes and the high corruption risk environment of business in Bangladesh, and they must adopt their necessary compliance plans accordingly. In this regard, the following recommendations can be made.

RECOMMENDATIONS

Strict anti-corruption measures must be adopted first by the companies before expanding or starting their business in any of the six above-mentioned territories. The company must have a code of conduct for its employees and the third parties related to it. The rules regarding the expected behaviour from the employees and the third parties should be clarified in the code of

conduct. Upon the code of conduct, an effective anti-corruption compliance program should be there. The compliance would deter the company official from committing serious corruption and would save the company from related legal complications. Furthermore, the company employees and third parties must be already trained on the code of conduct and anti-corruption compliance. The company must ensure measures so that such training programs are conducted periodically. Also, an environment of fearless communication must be ensured within the company and with third parties. Now, implementation of such would require a significant amount of spending. However, there are company employees who generally do not engage with customers. So, the risk of corruption is less for them, and a general training program can be arranged for such employees. On the other hand, the company would dedicate more assets to employees and third parties who are in a position of high risk of corruption. Also, before appointing a third party, the company must check the past history of that third party. They must review the internal compliance situation of the company and abstain from appointing any third party with a history of corruption and malpractice. Moreover, the company must establish effective oversight mechanisms for employees, partners, consultants, and suppliers so that all the established measures work efficiently. Again, when we are discussing preventing corruption in a country like Bangladesh, it involves political goodwill which must be reflected in the country's national policies. Major macro-level reform in governance is a pre-condition in this regard. The bureaucracy must be made capable of enforcing anti-corruption policies to ensure the realization of a corruption-free environment for businesses. Also, there is a need for micro-level policy making, keeping in mind particular sectors' corruption. As a result, particular reform could be prescribed based on determinants at the sectoral level and the respective groups could be empowered to follow such policy in a coordinated way. Also, the association of civil society, related industry associations, and other stakeholders could be ensured for better governance if such sector-wise reform is adopted. We must bear in mind that no single anti-corruption policy would be 'the best policy' and every such policy adoption would bear some lacking that must be revised after apprehending such lacking in the implementation stage. There might be even strong opposition regarding any particular policy from the corporations and affected quarters and there could be serious attempts by the corrupt to modify the policies that are taken to stop corruption. The weak technical capacity of the bureaucracy and the weak enforcement mechanisms of the state structure might make this situation more complex. Therefore, a special and unique enforcement mechanism must be designed that would be free, impartial, and independent of the existing bureaucratic structure and whose sole responsibility would be to enforce the reformed anti-corruption policy of the

state. Now, there should be two types of reform strategies adopted one by one for efficient reform. Firstly, there must be Moderately Feasible Strategies. Moderately feasible strategies refer to strategies that do not seriously challenge the existing coalition between corporate and political infrastructures. Previously various attempts at reform by the government failed because they threatened to hinder the existing system at the very beginning. This strategy does not also require the expert bureaucratic capability to eradicate corruption. Also, as there is little or almost no resistance it is possible to enforce it within a targeted time limit. Also, the inherent aim of this type of strategy is to achieve support from various stakeholders at the sectoral level. However, there will always be some sort of resistance from the corrupt and the ultimate judgment of such feasibility would ultimately come from the assessment of the stakeholders who would be affected by the reform policy. Secondly, when a moderate feasibility strategy is established, then Low Feasibility Strategies would be taken. Low feasibility strategy policies would threaten the existing corrupt system and try to eradicate the whole environment of corruption. There is a need for independence and bureaucracy to implement these strategies and it would face great opposition. However, efficient implementation of these policies would result in the improvement of the business environment in Bangladesh.

CONCLUSION

In this age of rapid expansion, companies need effective solutions to grow their business free of any legal hassle. Only a properly trained legal team and learned company officials can ensure such a smooth expansion of business following all the rules and regulations of the target jurisdiction. So, it is a must for the companies not only to furnish themselves with trusted, tested, and skilled employees but also to ensure that all the employed and third-party personnel are up to date regarding any change as per the legislation and public policy regarding bribery. The realm of anti-corruption legislation is a diverse one. But very few attempts have been there to find out any general characteristics of the laws from a different jurisdiction to provide the company officials and authorities with a general understanding of the subject matter. It can be hoped that, with the knowledge of the domestic legal provisions and the common trends outlined in this paper, the company officials and the third parties can avoid violation of anti-corruption laws in the discussed jurisdictions while expanding business in such jurisdictions.

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