

Anti-Bribery and Corruption Services

Services

Proactive Services

Risk Assessment and Internal Controls

- Assess adequacy of incumbent anti-bribery compliance policies and programmes
- Evaluate design and effectiveness of internal controls

Anti-Bribery and Corruption Due Diligence

- Investigate integrity of stakeholders and third parties, including politically-exposed-persons (PEPs)
- Perform examination of subsidiaries, joint ventures and controlled entities
- Analyse books and records for potential bribery or corruption irregularities

Reactive Services

- Perform fact-finding investigations and forensic accounting reviews to determine scope of corruption
- Conduct background investigations of third parties to support internal investigations
- Assist in responding to government subpoenas
- Identify, extract and analyse electronic data from both email and accounting systems
- Prepare formal reports for regulators and law enforcement agencies
- Support counsel in plea negotiations

Remediation

- Develop and participate in implementation of enhanced controls and corporate "best-practices"
- Review and evaluate implemented compliance training programmes

Monitoring

- Conduct government mandated monitoring and reporting

Whether conducting investigations or responding to allegations of foreign bribery or corruption; evaluating potential foreign business transactions; or designing and implementing company compliance programmes, having the right information at the right time is critical. With extensive behind-the-scenes experience in managing critical issues and complex business challenges from around the world, the multidisciplinary Forensic Accounting and Investigations team at FTI Consulting is able to deliver prompt and planned responses to complex business problems as soon as they arise.

As corporations seek out emerging markets to drive market share growth; source supplies and components; or form joint ventures with new business partners abroad, corporate officers and directors must remain vigilant to avoid potential violations of applicable global anti-bribery and corruption statutes. The U.S. Foreign Corrupt Practice Act (FCPA), The UK Bribery Act, and the Organisation for Economic Co-operation and Development (OECD) have come together to form a robust global anti-bribery and corruption regulatory regime with long-arm jurisdiction and very significant penalties for violators. FTI Consulting is uniquely poised to help our clients navigate anti-bribery and corruption risk at any juncture, whether it is on the back of an allegation or reported event, or as part of ongoing improvements in internal compliance and risk policies.

Our Strengths

Global Capabilities

- We have more than 4,000 professionals worldwide located across 25 markets.
- The largest specialist business advisory firm in Asia Pacific with multilingual FCPA experts based in all major markets across the region.

Experienced Specialist Teams

- Teams are made up of seasoned experts, including former SEC accountants, federal prosecutors and law enforcement professionals who have in-depth familiarity with leading multi-jurisdictional anti-corruption investigations, risk assessments and compliance monitoring.
- Proficient in dealing with government or regulatory inquiries and investigations, enforcement action or remediation settlement in the context of bribery allegations.

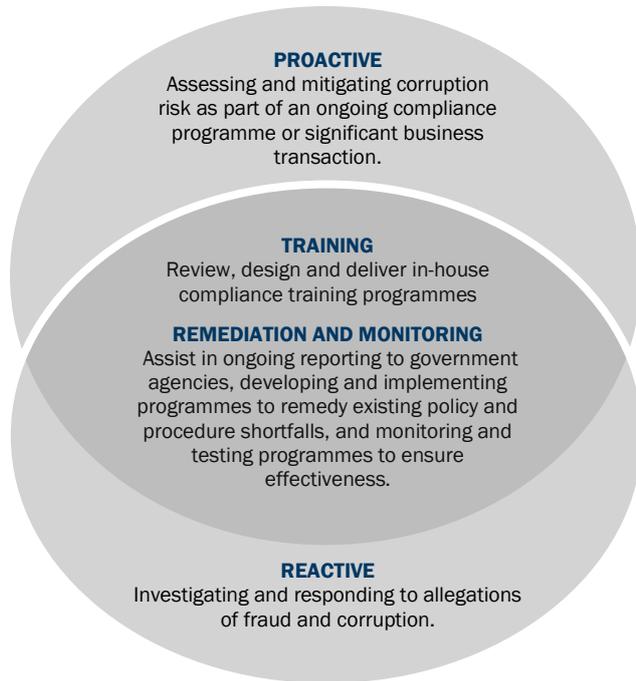
Value Enhancing Solutions

- Our state-of-the-art, proprietary forensic and data mining tools provide in-depth and cost-effective analysis of large document sets in multiple languages, including Chinese (both traditional and simplified characters), Korean and Japanese.
- Our multidisciplinary teams draw from their deep industry experience and expertise in forensic accounting, business investigations, electronic evidence and computer forensics, and complex data analytics to provide you with a comprehensive road map to overcome bribery and corruption issues.



Our Services

FTI Consulting offers specialised services to address, mitigate and/or investigate corruption:



Our Experience

Representative examples of our engagements include:

Risk Assessments

Our client, a Fortune 500 global manufacturing company, engaged FTI Consulting to perform risk assessments related to compliance with anti-corruption regulation. The assessments were carried out for multiple wholly-owned subsidiaries in various countries, including China and South Korea.

As part of our on-going work, we conducted interviews with company personnel and performed transactional forensic analysis to assess risk of corruption at each location. We also performed due diligence reviews to determine adequacy of anti-bribery controls and compliance culture for several significant pending acquisitions.

FCPA Risk Assessment Review

Our team was retained by an American global telecommunications company to conduct an FCPA risk assessment review of its PRC operations. This took place as part of an on-going FCPA investigation. We undertook extensive transaction testing of 'high-risk' general ledger accounts and process walkthrough discussions with local company employees to identify any apparent FCPA risks and internal control issues.

Post-Acquisition Risk Assessments

FTI Consulting was engaged to conduct post-acquisition risk assessments for the Hong Kong and China operations of a U.S.-listed life sciences equipment manufacturer, following its acquisition by another U.S.-listed multinational corporation. Our team undertook extensive transaction testing and conducted interviews with more than 40 company employees in Hong Kong and Shanghai. We were also involved in subsequent remediation work, addressing key risk areas identified and assisting with alignment of the gift and entertainment policies of both companies.

Investigate Whistle-Blower Allegations

We were retained by the external counsel representing an Audit Committee of a U.S.-listed provider of scientific instruments to investigate whistle-blower allegations that the company's local management in China was bribing Chinese government officials in order to secure sales contracts. Our team undertook onsite investigations in Hong Kong, Beijing and Shanghai, which involved transactional forensic analysis, computer forensic analysis, interviews with company employees and investigative due diligence of over 60 commission recipients to determine their status and relationships with the company's customers, a majority of which were State-Owned Enterprises (SOEs).

Whistle-Blower Allegations

FTI Consulting was retained by the external counsel representing a global engineering and design services firm to investigate whistle-blower allegations that bribes were being paid via third parties to Chinese government officials to secure sales contracts. We worked closely with the company's compliance personnel based in the region and at headquarters to carry out a forensic review of numerous reports and related contracts for subcontractors, inter-company and travel payments and employee expenses which were maintained at multiple locations across the PRC.



For more information on our activities across Asia Pacific and how FTI Consulting can help your business, please contact us on info-ap@fticonsulting.com

CRITICAL THINKING
AT THE CRITICAL TIME™

About FTI Consulting

FTI Consulting, Inc. is a global business advisory firm dedicated to helping organisations protect and enhance enterprise value in an increasingly complex legal, regulatory and economic environment. FTI Consulting professionals, who are located in all major business centres throughout the world, work closely with clients to anticipate, illuminate and overcome complex business challenges in areas such as investigations, litigation, mergers and acquisitions, regulatory issues, reputation management and restructuring.