



# 16<sup>TH</sup> ANNUAL NEW YORK CONFERENCE ON THE FOREIGN CORRUPT PRACTICES ACT

THE PREMIER LEGAL & REGULATORY ANTI-CORRUPTION COMPLIANCE EVENT



**May 19 – 20, 2014**

**New York Marriott Downtown – New York, NY**

## Keynote Addresses:

**Stephen Zimmerman**  
Director of Operations  
Integrity Vice Presidency  
The World Bank

**Gerson A. Zweifach**  
Group General Counsel  
and Chief Compliance Officer  
21st Century Fox

## The View from the US DOJ and SEC on FCPA Enforcement Priorities:

**Patrick Stokes**  
Deputy Chief, FCPA Unit  
Fraud Section, Criminal Division  
U.S. Department of Justice

**Kara N. Brockmeyer**  
Chief, FCPA Unit  
Division of Enforcement  
U.S. Securities and  
Exchange Commission

## Corporate Perspectives from:

Alcoa	Intel
MetLife	Pfizer
UPS	Agilent Technologies
TE Connectivity	E.I. DuPont de Nemours
General Electric	JPMorgan Chase
Weatherford	Barclays
Prudential Financial	BAE Systems
Morgan Stanley	Hercules Offshore Drilling
NBCUniversal	AES

What's New? The 2014 New York Conference features exclusive, forward-thinking panels and practical benchmarking opportunities, including:

- ✓ **Live Audience Polling** – Participate in the conference and learn how the rest of the industry tackles third party risks, data analytics, global risk assessments and internal investigations
- ✓ **Practical Third Party Case Studies** – Review practical scenarios on how to minimize third party risks in **China, Russia** and **Brazil**
- ✓ **SEC Alumni Panel** – Former SEC officials expose how to meet SEC's expectations for FCPA financial controls and where companies go wrong with FCPA books and records
- ✓ **FCPA Moot Court** – Former DOJ officials and senior defense counsel debate highly contested FCPA issues including jurisdiction, definition of government official and accounting controls
- ✓ **The Art of Remediation Programs** – Cleaning up after an FCPA investigation
- ✓ **Compliance Program Innovations** on third party technology platform, employee engagement, and cross-discipline compliance

## European Prosecutors Share How Cross-Border Bribery Investigations are Built

**Sergio Spadaro**  
Public Prosecutor  
Court of Justice (Milan)  
*Prosecutor in ENI SpA, Saipem SpA*

**Richard Findl**  
Section Head  
Public Prosecutor's Office (Munich)  
*Prosecutor in Siemens, MAN S.E. and  
Ferrostaal AG.*

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*“Working with our partners like the FBI, the Department of Homeland Security, the Department of Commerce, the SEC, and IRS-Criminal Investigations, we have made enforcement of the FCPA a priority. Together, we are pursuing more cases than ever before, and we are using all of the investigative tools available to us from subpoenas to search warrants, from body wires to wiretaps.”*

– Deputy Attorney General James Cole at ACI’s 30th International Conference on the Foreign Corrupt Practices Act, November 2013 – Washington, DC

Anti-corruption efforts are sweeping the globe – with the long arm of the FCPA showing no signs of slowing down, investigations have picked up in the UK and EU, while the world watches closely as countries including China, Brazil, Mexico, India and Russia continue to strengthen their regulatory and enforcement regimes. It seems as if no industry is immune with current FCPA investigations affecting a broad range of industries including life sciences, financial services, retail and consumer goods, food & beverage, entertainment, oil & gas, and technology.

After the tremendous success of its flagship FCPA conference in Washington DC last November, American Conference Institute continues to innovate with a fully updated **16<sup>th</sup> Annual New York Conference on the Foreign Corrupt Practices Act**. The acclaimed conference includes the latest cases, timely topics, new speakers and audience polling designed to get a first-hand pulse from industry on key anti-corruption challenges facing global companies today. With new Keynote Speakers including both US and foreign prosecutors, the World Bank, and a General Counsel, come see why this New York conference gets rave reviews and has become the must-attend event of the year.

#### Other benefits in attending include:

- Access to exclusive, interactive post-conference working groups on May 21:
  - **Third Party Due Diligence from A to Z: Applying a Risk-Based Due Diligence Approach to Vetting, On-Boarding and Monitoring your Third Parties** – Learn how to proactively assess regional and local risks while controlling costs and adhering to regulatory requirements
  - **Turning Written Policies into Action: How to Effectively Implement and Execute your Anti-Corruption Compliance Program to your Local Compliance Team in High Risk Markets** – Gain a diverse industry perspective on addressing local customs and limited resources while implementing your global compliance program
- Go **beyond the risk assessment** – ensure that one transaction does not cause issues in multiple jurisdictions
- **What to expect from the SEC** – former SEC officials dish out on internal controls expectations
- Learning and benchmarking with over **150 anti-corruption compliance professionals** from multiple industries facing common everyday FCPA challenges

Reserve your seat now at this unique, market-driven FCPA conference. Group pricing is available. Call **1-888-224-2480** or visit [www.FCPAconference.com/NY](http://www.FCPAconference.com/NY) for more information.



#### AUDIENCE POLLING

Select panel sessions will incorporate anonymous polling to collect audience feedback and identify compliance best practices – Polling is designed to give audience members a unique look into how industry is dealing with challenges such as the use of data analytics, internal accounting controls, minimizing risk in joint ventures, compliance best practices.

With individual keypads, the audience will be able to respond to panel questions candidly, enabling you to get honest feedback about corporate anti-corruption compliance program strategies and pitfalls.

## Who You Will Meet

- General Counsel
- International Trade Counsel
- Compliance and Ethics Officers
- Vice Presidents and Directors of
  - Global Compliance
  - Corporate Compliance & Policies
  - Integrity
  - Business Conduct & Investigations
  - Sustainable Development
- Corporate Responsibility & Citizenship
- International Trade Compliance
- Contracts
- Internal/Corporate Audit
- Legal Affairs
- Regulatory and Government Affairs
- International Contract Managers
- Forensic Accountants
- Auditors
- Certified Fraud Examiners
- Outside Counsel specializing in:
  - International Trade
  - Corporate Compliance
  - White-Collar Crime
  - Internal Investigations
  - Anti-Money Laundering
  - Corporate Governance
  - Securities

# AGENDA-AT-A-GLANCE

## DAY 1: Monday, May 19, 2014

- 7:30 Continental Breakfast and Registration Begins
- 8:30 Co-Chairs' Opening Remarks
- 8:45 View from the DOJ and SEC: What the Most Recent Cases Reveal of Enforcement Priorities
- 10:00 Networking Break
- 10:15 A Conversation with International Prosecutors on the Coordination of Enforcement Actions, Law Enforcement Techniques and How Cases are Built
- 11:15 How to Leverage Metrics and Data Analytics to Improve your Risk Assessment: What Data to Gather, How to Measure and Incorporate Results into your Compliance and Risk Management Strategy (Audience Polling)
- 12:15 Keynote Address: How World Bank Enforcement Differs from FCPA Investigations
- 12:45 Networking Luncheon
- 2:00 SEC Alumni Panel – What the SEC Expects of FCPA Financial Controls and Where Companies Go Wrong (Audience Polling)
- 3:00 Networking Break
- 3:15 Predicting Future Risks: How to Create your Company's Heat Map and Plan Ahead to Prevent Violations from Future Transactions (Audience Polling)
- 4:15 Minimizing FCPA Risk Exposure in Majority, Minority and Contractual Joint Ventures (Audience Polling)
- 5:15 End of Day 1

## DAY 2: Tuesday, May 20, 2014

- 8:30 Co-Chairs' Opening Remarks
- 8:35 General Counsel's KEYNOTE: Implementing Compliance Programs and Overseeing Investigations Across Borders
- 9:05 Moot Court Competition: An Interactive Debate on the Definition of "Foreign Government Official," FCPA Jurisdiction, and the Meaning of "Internal Accounting Controls" (Audience Polling)
- 10:15 Networking Break
- 10:30 Case Studies on Minimizing Global Third Party Risks – An Interactive Discussion on How to Resolve Practical Scenarios in China, Russia and Brazil (Audience Polling)
- 11:45 The Art of Remediation Programs: How to Clean Up after an FCPA Investigation or Penalty, and When to Start
- 12:45 Networking Luncheon
- 2:00 Interactive Panel on Compliance Program Innovations (Audience Polling)
- 3:00 Networking Break
- 3:15 Navigating Complex International Data Privacy Restrictions During an Internal Investigation: How to Prevent Common Missteps when Gathering, Transferring, and Preserving Data Across Borders (Audience Polling)
- 4:15 Managing Fraud and Corruption Risks in M&As (Audience Polling)
- 5:15 End of Conference

## Post-Conference Working Groups: Wednesday, May 21, 2014

Working Group A: 9:00am – 12:30pm

Third Party Due Diligence Benchmarking: How to Apply a Risk-Based Due Diligence Approach to Vetting, On-Boarding and Monitoring your Third Parties

Working Group B: 1:30pm – 5:00pm

Turning Written Policies into Action: How to Effectively Implement and Execute your Anti-Corruption Compliance Program to your Local Compliance Team in High Risk Markets

# DAY 1: Monday, May 19, 2014

7:30 Continental Breakfast and Registration Begins

8:30 **Co-Chairs' Opening Remarks**

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**Susan Ringler**

Vice President, Chief Ethics & Compliance Officer  
Alcoa (New York, NY)

**Timothy L. Dickinson**

Partner  
Paul Hastings LLP (Washington, DC)

8:45 **View from the DOJ and SEC: What the Most Recent Cases Reveal of Enforcement Priorities**

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**Patrick Stokes**

Deputy Chief, FCPA Unit  
Fraud Section, Criminal Division  
U.S. Department of Justice (Washington, DC)

**Kara N. Brockmeyer**

Chief, FCPA Unit, Division of Enforcement  
U.S. Securities and Exchange Commission  
(Washington, DC)

**Kathryn Atkinson – Panel Moderator**

Partner  
Miller & Chevalier Chartered (Washington, DC)

*With coordinated enforcement efforts from the DOJ and SEC continuing to rise, this session will allow attendees to hear directly from the agencies on what their priorities are and how recent cases should impact industry's compliance program and risk management initiatives.*

- Review of 2013 FCPA cases against companies and individuals
- The evolving nature of global investigations and DOJ and SEC involvement in foreign prosecutions
- U.S. enforcement authorities' ability to reach foreign issuers
- The use of proactive law enforcement techniques, informants, undercover investigations, sting operations
- The convergence of FCPA compliance, export controls, trade sanctions and anti-money laundering
- What the SEC and DOJ look for when assessing FCPA compliance programs – how cooperation and compliance enhancements lead to mitigated penalties
- The dynamics of industry-wide investigations: how they unfold, how one leads to another and how they end

10:00 **Networking Break**

10:15 **A Conversation with International Prosecutors on the Coordination of Enforcement Actions, Law Enforcement Techniques and How Cases are Built**

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**Richard Findl**

Section Head  
Public Prosecutor's Office (Munich)

**Sergio Spadaro**

Public Prosecutor  
Court of Justice (Milan)

**Kathleen M. Hamann**

Partner  
White & Case LLP (Washington, DC)  
*Former Trial Attorney and Anticorruption Policy Counsel, Criminal Division, U.S. Department of Justice*

**Boyd M. Johnson III – Panel Moderator**

Partner  
Wilmer Cutler Pickering Hale and Dorr LLP (New York, NY)

- How securities regulators cooperate and build international civil cases
- How US regulations interact with foreign laws when gathering evidence
- Who gets evidence first and when
- Obstacles/challenges to cooperation
- How should a company cooperate in an multi-jurisdictional investigation – what agency to contact first
- Communicating with foreign government authorities: balancing cooperation with maintaining an effective defense

11:15 **How to Leverage Metrics and Data Analytics to Improve your Risk Assessment: What Data to Gather, How to Measure and Incorporate Results into your Compliance and Risk Management Strategy**

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**Laura Heeger**

Assistant Vice President, Global Anti-Corruption Unit  
MetLife (New York, NY)

**Claudius O. Sokenu**

Partner  
Shearman & Sterling LLP (New York, NY)

**Matthew Shelhorse**

Partner, Forensic Services Practice  
PwC LLP (New York, NY)

**Susan Ringler – Panel Moderator**

Vice President, Chief Ethics & Compliance Officer  
Alcoa (New York, NY)



AUDIENCE POLLING

- Practical steps you can take to begin collecting data and making it part of your anti-corruption compliance management strategy
- Proactive v. reactive data analytics strategies
- How to decide which data to analyze and why it needs to be analyzed
- Understanding what data your company is collecting and how to use this information to benefit your risk management strategies
- How to “clean” the data to make it understandable and presentable to senior management

12:15 **Keynote Address: How World Bank Enforcement Differs from FCPA Investigations**

**Stephen Zimmerman**

Director of Operations, Integrity Vice Presidency  
The World Bank (Washington, DC)

12:45 **Networking Luncheon**

2:00 **SEC Alumni Panel – What the SEC Expects of FCPA Financial Controls and Where Companies Go Wrong**

**Cheryl J. Scarboro**

Partner  
Simpson Thacher & Bartlett LLP (Washington, DC)

**Richard W. Grime**

Partner  
O’Melveny & Myers (Washington, DC)

**Walter G. Ricciardi – Panel Moderator**

Partner  
Paul, Weiss, Rifkind, Wharton & Garrison LLP  
(New York, NY)

*Hear what former SEC prosecutors have to say about the current SEC enforcement climate, what recent cases and settlements reveal about what companies should do now to prepare and meet FCPA accounting provisions, including:*

- Whether the statute’s requirement to maintain a system of “internal accounting controls” infers an obligation to maintain an effective compliance program
- Key points the SEC focuses on during an investigation of your financial controls
- The materiality of FCPA vs SOX controls
- How to meet requirement for transaction testing to validate completeness and accuracy of books and records
- How to ensure continuous monitoring of key internal accounting controls

3:00 **Networking Break**

3:15 **Predicting Future Risks: How to Create your Company’s Heat Map and Plan Ahead to Prevent Violations from Future Transactions**

**Norman M. Brothers**

Vice President, Legal  
UPS (Atlanta, GA)

**Raymond Banoun**

Partner  
Cadwalader, Wickersham & Taft LLP (Washington, DC)

**Sandra Maria Parrado**

Partner, Forensic Services Practice  
PwC LLP (New York, NY)

**Bill Leone – Panel Moderator**

Partner  
Norton Rose Fullbright (Denver, CO)

- Going beyond the risk assessment: Ensuring that one transaction does not cause issues in multiple jurisdictions
- Providing senior management with the information necessary to make sound decisions going forward
- Understanding what you are seeing and evaluating before a deal
- Threat assessment: How to proactively assess high risk situations and implement contingency plans to manage the risk
- How to increase chances of detection through audit programs

4:15 **Minimizing FCPA Risk Exposure in Majority, Minority and Contractual Joint Ventures**

**Brian R. Michael**

Vice President & Deputy General Counsel  
21st Century Fox  
Group Chief Compliance Officer  
Fox Networks Group (Los Angeles, CA)

**Alisa Shudofsky**

Senior Vice President, Compliance  
NBCUniversal (Los Angeles, CA)

**Jacqueline C. Wolff**

Partner  
Manatt, Phelps & Phillips, LLP (New York, NY)

**Karen P. Hewitt – Panel Moderator**

Partner  
Jones Day (San Diego, CA)

- Assessing both majority and minority stake JVs and understanding government compliance expectations of each
- Utilizing your resources to monitor and track your JV partners for FCPA risks
- How contractual safeguards can mitigate your risk
- Understanding the myriad cultural differences between partners when assessing your risk exposure

5:15 **Conference Adjourns to Day 2**

## 8:30 Co-Chairs' Opening Remarks

### 8:35 **General Counsel's KEYNOTE: Implementing Compliance Programs and Overseeing Investigations Across Borders**

#### **Gerson A. Zweifach**

Senior Executive Vice President  
Group General Counsel and Chief Compliance Officer  
21st Century Fox (New York, NY)

### 9:05 **Moot Court Competition: An Interactive Debate on the Definition of Foreign Government Official, FCPA Jurisdiction, and the Meaning of Internal Accounting Controls**

#### **Charles E. Duross**

Partner  
Morrison and Foerster (Washington, DC)

#### **Lanny A. Breuer**

Partner  
Covington & Burling LLP (Washington, DC)

#### **Robert W. Tarun**

Partner  
Baker & McKenzie LLP (San Francisco, CA)

#### **Richard C. Smith**

Partner  
Norton Rose Fulbright (Washington, DC)

#### **Peter Clark – Panel Moderator**

Partner  
Cadwalader, Wickersham & Taft LLP (Washington, DC)

*Hear from former USDOJ officials on some of the most controversial FCPA issues in a Moot Court debate – the use of audience polling will allow for a real-time pulse on where industry stands on each issue.*

- Definition of Foreign Official
- FCPA Jurisdiction
- Internal Accounting Controls

## 10:15 **Networking Break**

### 10:30 **Case Studies on Minimizing Global Third Party Risks – An Interactive Discussion on How to Resolve Practical Scenarios in China, Russia and Brazil**

*This interactive panel will address high risk markets that keep compliance officers up at night. Panel leaders will discuss local third party risks that are unique to each jurisdiction, providing attendees with a global perspective on the nuances of third party risks in different markets.*

### **Evaluating a new business partner in China and identifying potential ties to Chinese government officials**

#### **Christine Stickler**

Assistant General Counsel  
Chief Ethics and Compliance Officer  
TE Connectivity (Middletown, PA)

### **Identifying red flags in your distributors books and records in Russia**

#### **William Gordon**

Associate General Counsel  
Hercules Offshore Drilling (Houston, TX)

### **Vetting and monitoring your third parties in Brazil**

#### **Colette Devine**

Deputy Chief Compliance Officer  
The AES Corporation (Arlington, VA)

#### **Didier Lavion – Panel Moderator**

Partner, Forensic Services Practice  
PwC LLP (New York, NY)

### 11:45 **The Art of Remediation Programs: How to Clean Up after an FCPA Investigation or Penalty, and When to Start**

#### **William B. Jacobson**

Vice President, Co-General Counsel  
Chief Compliance Officer  
Weatherford International, Ltd. (Houston, TX)

#### **Jon R. Fetterolf**

Partner  
Williams & Connolly LLP (Washington, DC)

#### **Homer E. Moyer, Jr.**

Partner  
Miller & Chevalier Chartered (Washington, DC)

#### **Manny Alas – Panel Moderator**

Partner, Forensic Services Practice  
PwC LLP (New York, NY)

- How compliance policies and procedures should differ when a company is in remediation
- Employment decisions: which employees to terminate, which to rehabilitate and how
- Training programs: making sure the employees “get it”
- Customers: what and when to make disclosures to customers
- Agents: terminating problematic agents, engaging new ones
- Responding to foreign government inquiries resulting from US disclosures
- Living with a compliance monitor: selection, review and work plan and the “hybrid monitorship”

## 12:45 **Networking Luncheon**



AUDIENCE POLLING



AUDIENCE POLLING

2:00 **Interactive Panel on Compliance Program Innovations**

**Dan Freed**

Vice President, Assistant General Counsel  
Chief Compliance Officer  
Agilent Technologies, Inc. (Santa Clara, CA)

**Melissa Chia**

Managing Director, Global Anti-Corruption Compliance  
JPMorgan Chase (New York, NY)

**Mark Sagrans**

Corporate Counsel  
E.I. DuPont de Nemours (Philadelphia, PA)

**Timothy L. Dickinson – Panel Moderator**

Partner  
Paul Hastings LLP (Washington, DC)

*With the nature of anti-corruption investigations and enforcement activities continuing to evolve in the US and abroad, so must your compliance program. Companies must constantly evaluate their programs as new risks arise. At this unique panel led by compliance officers in different industries, hear about some of the most successful innovations in global compliance programs. The audience will be provided with the opportunity to participate in the conversation using polling devices and interactive Q&A. Innovations that panelists will focus on will include:*

- ✓ Third Party Technology Platform
- ✓ Employee Engagement
- ✓ Cross-Discipline Compliance (AML, Economic Sanctions, Export Controls, FCPA)



AUDIENCE POLLING

3:00 **Networking Break**

3:15 **Navigating Complex International Data Privacy Restrictions During an Internal Investigation: How to Prevent Common Missteps when Gathering, Transferring, and Preserving Data Across Borders**

**Katherine Choo**

Chief Investigative & Anti-Corruption Counsel  
General Electric (New York, NY)

**Gary DiBianco**

Partner  
Skadden, Arps, Slate, Meagher & Flom LLP (London)

**Robert D. Luskin**

Partner  
Patton Boggs LLP (Washington, DC)

- Managing production of documents to multiple governments
- Capturing and preserving electronic info
- Handling conflicting data privacy laws
- Overcoming restrictions on transmitting data across borders
- Setting up databases to track ongoing investigation, hotline calls



AUDIENCE POLLING

4:15 **Managing Fraud and Corruption Risks in M&As**

**Raja Chatterjee**

Executive Director, Global Head, Anti-Corruption Group  
Morgan Stanley (New York, NY)

**Stephen J. Shine**

Chief Regulatory Counsel  
Prudential Financial (Newark, NJ)

**Tom Best**

Partner  
Steptoe & Johnson LLP (Washington, DC)

**Greg D. Andres – Panel Moderator**

Partner  
Davis Polk & Wardwell LLP (New York, NY)

- How to negotiate due diligence parameters and set contingency plans early
- How to analyze the potential liability on both parties to a merger
- Conducting effective pre-acquisition due diligence to identify business and regional risks
- View from the DOJ on voluntarily disclosing a target's wrongdoing and taking action to address the issue
- You've closed, now what? Next steps on resolving issues in integration and remediation



AUDIENCE POLLING

5:15 **Conference Ends**

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American Conference Institute (ACI) will apply for Continuing Professional Education credits for all conference attendees who request credit. There are no pre-requisites and advance preparation is not required to attend this conference.

Course objective: Update on the Foreign Corrupt Practices Act and procedures to prevent inappropriate payments. Recommended CPE Credit: 13.5 hours. An Additional 4.0 credit hours will apply to workshop participation.

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You are required to bring your state bar number to complete the appropriate state forms during the conference. CLE credits are processed in 4-8 weeks after a conference is held.

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# Post-Conference Working Groups:

## Wednesday, May 21, 2014

### A

9:00 am – 12:30 pm – Registration begins at 8:30 am

#### Third Party Due Diligence Benchmarking: How to Apply a Risk-Based Due Diligence Approach to Vetting, On-Boarding and Monitoring your Third Parties

##### **Anne Takher**

Senior Compliance Attorney  
Intel (San Francisco, CA)

##### **Kenneth Kurtz**

Chief Executive Officer  
Steele CIS (San Francisco, CA)

##### **Pravin Rao**

Partner  
Perkins Coie LLP (Chicago, IL)

*Third party due diligence for the life of the relationship is critical for minimizing your risk exposure to corruption violations. Companies need to actively assess regional and local risks in order to gain insight on the inner workings of a credible third party while controlling costs and demonstrating strict compliance with regulatory expectations.*

*At this intensive working group, benefit from proven-effective strategies to create a cost-effective and credible risk-based third party compliance program.*

*Topics to be discussed include:*

- How to incorporate effective front-end vetting and screening protocols based on the type of relationship and interests represented by the third party
- Initial steps on background and reputation checks – identifying initial red flags and DOJ expectations
- What to look for when evaluating parties within certain countries
- Understanding your business rationale for using a third party
- Defining the scope of due diligence required for each third party and staying up-to-date as the nature of the relationship changes over time
- Best practices on performing effective compliance audits of your third party management program

### B

1:30 pm – 5:00 pm – Registration begins at 1:00 pm

#### Turning Written Policies into Action: How to Effectively Implement and Execute your Anti-Corruption Compliance Program to your Local Compliance Team in High Risk Markets

##### **Parth Chanda**

Senior Corporate Counsel  
Anti-Corruption Program Office Lead  
Pfizer (New York, NY)

##### **Terence Gilroy**

Vice President, Legal, Financial Crime Counsel  
Barclays (New York, NY)

##### **Justin Harrison**

Assistant General Counsel, International Compliance  
BAE Systems, Inc. (Arlington, VA)

*Multinationals face a difficult challenge when implementing a global compliance program. Gaining buy-in from in-country compliance managers, addressing local customs and limited resources are just a few of the many issues facing companies today.*

*This in-depth working group will deliver strategies on how to transform your written compliance program into practice for those who are responsible for regional compliance. Learn how to:*

- Train your local team on balancing the FCPA and local anti-bribery laws with customary business practices in high risk markets
- Ensure local compliance staff have the resources to identify red flags in day-to-day operations
- Update your compliance program for each market that takes into account local corruption challenges and evolving local and global anti-corruption regulations
- Educate your compliance team on creating a robust, compliant approach to gifts, entertainment and hospitality
- Allocate resources during and address challenges arising from cross-border investigations
- Overcome cultural and legal challenges in rolling out an employee engagement program
- Make compliance training a priority and get the message to permeate throughout a large organization

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