

The ACR Brief

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Compliance Programs and the New FCPA Corporate Enforcement Policy

Late in November, the DOJ announced a new FCPA Corporate Enforcement Policy in a move that Deputy Attorney General Rod Rosenstein described not just as a continuation of the Pilot Program, but as a formalization and an enhancement of the prior policy. While initial reactions ran the gamut from “no news here” to “this is a monumental change,” the truth seems to lie somewhere in the middle. In an insightful series, the [first installment](#) of which we published last week, our Senior Editor Megan Zwiebel went well beyond those first-blush impressions and discussed the deeper enforcement and compliance implications with a variety of FCPA counsel.

While there are many takeaways from the new policy, “the most valuable part of the Pilot Program and now the FCPA Corporate Enforcement Policy is the advice on how to formulate a compliance program,” said EY’s Steve Spiegelhalter, a former FCPA prosecutor. “The best way to avoid a problem is to invest heavily in a compliance program and I think Justice has given a lot of really good guidance recently on what that program should look like.”

As companies strive to implement that guidance, our archives can be a helpful tool. Our database of articles contains volumes of compliance advice from the professionals most qualified to give it – those responsible for building and maintaining company compliance programs. Thinking about ramping up your third-party due diligence program? We gathered [in-house perspectives](#) on how a variety of companies handle that task. Looking for information on measuring your existing compliance system? Our four-part series on the topic discusses [how to get started](#), what areas of compliance companies [should be measuring](#), how to [measure quality](#) and how to gather and [analyze the necessary data](#). Curious about how other companies handle training? Our [interview with Kim Urbanchuk](#), counsel and director of ethics and compliance in the legal and compliance department at Airbus, about her company’s training program and how she benchmarks it against those at other companies, provides a point of comparison as well as a roadmap on how best to benchmark a training program.

These articles and others are listed below. And, as always, if you don’t find what you’re looking for, please reach out to our team. We can help point you in the right direction and are always looking for new nitty-gritty topics to explore in depth.

Warmly,
Nicole Di Schino
Editor-in-Chief