

# The ACR Brief

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## Using the New DOJ Policy as a Teaching Tool

Some have dismissed the DOJ's new [Policy on Coordination of Corporate Resolution Penalties](#) as a mere formalization of the Fraud Section's ongoing efforts to increase international cooperation in foreign bribery matters. However, even if the new policy resembles current practice, the fact that decreasing the "disproportionate enforcement of corruption laws by multiple authorities," is now an official goal of the Department is significant. It will most likely increase the number of multilateral enforcement actions and parties can leverage the policy when negotiating with the DOJ.

Even absent a DOJ investigation, compliance professionals can use the announcement of the new policy as a moment to increase awareness about international anti-corruption enforcement within their organizations. For instance, professionals can point to the current developments in France to highlight how international pressure has created more robust enforcement in countries that historically have not actively pursued corrupt companies. We recently shared a [French defense attorney's perspective](#) on her country's move towards a more U.S- or U.K.-style of anti-corruption enforcement. Activity in other regions can also provide talking points. We recently discussed [how companies should adapt their policies to account for political upheaval in Argentina and Chile](#).

The new policy is also a good reminder that company compliance programs should focus on international standards that transcend particular jurisdictions. Head to our recent article from the Ropes & Gray team to learn [how to use data and behavioral science to create a next-generation compliance program](#) or learn more about why [Wal-Mart is choosing to use the new ISO 37001 standard](#) to continue to modernize its program.

For even more on these important topics, visit the [International Cooperation](#) and [Compliance Culture](#) sections of our archives. And, if you have found creative ways to use the new policy as a teaching tool, we would love to hear about them.

Warm Regards,

Nicole Di Schino  
Editor-in-Chief