



# TRACE GLOBAL ENFORCEMENT REPORT

**2023** EDITION

# TABLE OF CONTENTS

Introduction	2
Glossary of Terms	3
Key findings	4
Investigations Concerning Bribery of Foreign Officials by Country	5
Enforcement Actions Concerning Bribery of Foreign Officials by Country	6
Enforcement Actions Concerning Bribery of Foreign Officials 2008–2023	7
U.S. Investigations Concerning Bribery of Foreign Officials by Company Headquarters or Individual Citizenship	8
U.S. Enforcement Actions Concerning Bribery of Foreign Officials by Company Headquarters or Individual Citizenship	9
U.S. Investigations Concerning Bribery of Foreign Officials by Country of Headquarters	10
U.S. Enforcement Actions Concerning Bribery of Foreign Officials by Country of Headquarters	11
Investigations Concerning Bribery of Domestic Officials by Country	12
Enforcement Actions Concerning Bribery of Domestic Officials by Country	13
Prevalence of Bribery 1977–2023	14
Total Investigations Concerning Bribery by Companies Headquartered in the U.S.	16
Total Enforcement Actions Concerning Bribery by Companies Headquartered in the U.S.	18
Total Investigations Concerning Bribery of Domestic and Foreign Officials by Industry (excluding United States)	20
Total Enforcement Actions Concerning Bribery of Domestic and Foreign Officials by Industry (excluding United States)	21
U.S. Investigations Concerning Bribery of Domestic and Foreign Officials by Industry	22
U.S. Enforcement Actions Concerning Bribery of Domestic and Foreign Officials by Industry	23



TRACE's annual Global Enforcement Report provides graphic and textual analyses of all known enforcement events—including investigations, enforcement actions, and declinations—since the first bribery cases were prosecuted in the United States following the enactment of the U.S. Foreign Corrupt Practices Act. Data from the Global Enforcement Report is based primarily on the cases and investigations tracked in the **TRACE Compendium**, TRACE's online database of transnational corruption cases. TRACE cannot know or accurately estimate how many enforcement events may be underway but not made public or not included in a major international publication. The analyses exclude purely domestic matters involving local companies bribing local government officials, reflecting only enforcement events for an alleged bribe with an international component that involve an alleged payment to a government official or an employee of a state-owned entity.

**The 2023 Global Enforcement Report** analyzes anti-bribery enforcement data from 2023 and provides a summary of 47 years of anti-bribery enforcement activity.

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**Note:** The full database of enforcement actions is available through the TRACE Compendium. Access to the TRACE Compendium is available through TRACE Corporate and Law Firm membership subscription options. To learn more, write to [info@TRACEinternational.org](mailto:info@TRACEinternational.org).

**Already a TRACE Corporate Member?** Access the Compendium through the [TRACE Resource Center](#). If you need a Resource Center login, write to [membersupport@TRACEinternational.org](mailto:membersupport@TRACEinternational.org).

# INTRODUCTION

Almost every country in the world prohibits the payment of bribes to their own government officials. Anti-bribery conventions sponsored by the United Nations, the Organization for Economic Co-operation and Development, the Organization of American States, the Council of Europe, and the African Union require signatory countries to establish binding standards for the criminalization of bribery of foreign public officials in international business transactions. Virtually every country in the world has ratified one of these international conventions and many have enacted laws that prohibit the payment of bribes to foreign government officials.

Despite the global denunciation of bribery, little information is publicly available on enforcement of these anti-bribery regulations. This can make it difficult to recognize trends concerning the extent to which countries are enforcing anti-bribery laws or where bribery is most prevalent, even though such information is critical to promoting transparency in global business. TRACE publishes the Global Enforcement Report (“GER”) annually in an attempt to provide this essential information. The 2023 GER provides an updated summary of international anti-bribery enforcement trends, based primarily on the cases and investigations tracked in the TRACE Compendium, TRACE’s online database of transnational corruption cases. The TRACE Compendium contains summaries of enforcement actions, investigations, and declinations involving the alleged bribery of government officials that crosses at least one border. Neither the TRACE Compendium nor the 2023 GER include matters involving domestic companies bribing domestic government officials. The alleged bribe must have a cross-border component and must involve a government official.

The 2023 GER offers both graphic and textual analyses of investigations and enforcement actions concerning the bribery of government officials from the enactment of the U.S. Foreign Corrupt Practices Act in 1977 through 31 December 2023. Where appropriate, the 2023 GER reflects revisions to the statistics reported in earlier editions of the GER, as our data are updated whenever TRACE obtains new or improved information regarding an investigation or enforcement action, or when the status of an enforcement action changes. The 2023 GER also represents TRACE’s continuing efforts to refine and improve the data utilized in the report. Neither the TRACE Compendium nor the 2023 GER can provide a precise and objective measurement of global anti-corruption enforcement. Instead, they are meant to provide general information on trends in international anti-corruption efforts on a broad scale.

The 2023 GER focuses on two distinct anti-bribery enforcement events undertaken by government authorities: investigations and enforcement actions. An **investigation** is an ongoing investigation by a government authority into allegations of bribery of government officials by a foreign company or individual. TRACE recognizes that investigations into allegations of bribery are sometimes dropped due to insufficient evidence, or for security or political considerations; they may be closed without any resolution; or they may continue indefinitely with no other action ever being taken. For purposes of the 2023 GER, investigations are no longer considered ongoing if 10

years have passed since they were last discussed in a publicly available document, or if 5 years have passed since a government authority brought an enforcement action or issued a declination on the same allegations. An **enforcement action** is an adjudication of allegations of bribery of government officials by a foreign company or individual. That is, there must be a final resolution that involves fines, penalties, disgorgement, a guilty plea, a sentencing or a settlement of charges.

The TRACE Compendium and 2023 GER include cases in which bribery allegations have been made against individual employees or representatives of companies (including employees of local subsidiaries of international companies). When a company and its employees or representatives face separate enforcement actions involving substantially the same conduct, only one enforcement action is counted in the 2023 GER. Except where a company specifically receives a declination, if a company does not face an enforcement action but its employees or representatives do, the enforcement action is counted as one enforcement action. Finally, while separate enforcement actions may be taken by different authorities in one country based on the same circumstances, only one such enforcement action is counted against a company or individual.

## GLOSSARY OF TERMS

**Investigation** – An ongoing investigation by a government authority into allegations of bribery of government officials by a foreign company or individual that has not been resolved by either an enforcement action or a declination.

**Enforcement Action** – An adjudication of allegations of bribery of government officials by a foreign company or individual that is a final resolution of charges involving fines, penalties, disgorgement, a guilty plea, a sentencing or a settlement of charges.

**Enforcement Event** – Investigations and enforcement actions are both considered “enforcement events.”

**Declination** – Termination of an ongoing investigation by a government agency without any enforcement action.

**Bribery of Foreign Official** – Improper payments made by an individual or a company to a foreign government official who is not a citizen of the government undertaking the enforcement action.

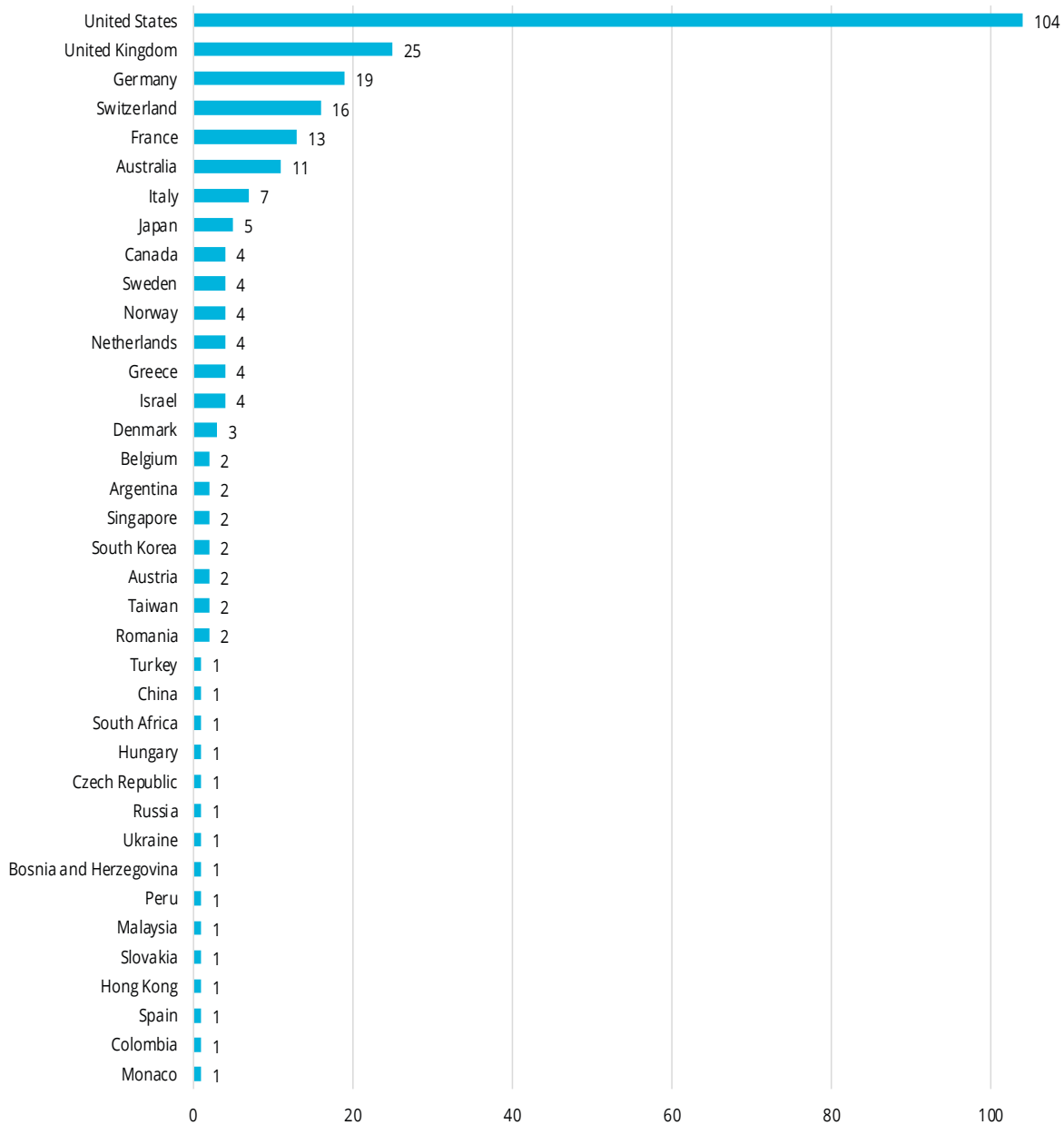
**Bribery of Domestic Official** – Improper payments made by either a foreign company or an individual to a government official who is a citizen of the government undertaking the enforcement action.

# KEY FINDINGS

- Continuing with the 2022 trend, 2023 GER observes a drop in the number of open bribery investigations being conducted worldwide. Several investigations have reached conclusion in 2023 following enforcement actions. Others were terminated after it was determined they were no longer in the public's best interest or because there were investigative complications that undermined the integrity of the enforcement action. In at least one case reviewed as part of this report, greater scrutiny of enforcement agency's prior investigations contributed to termination of two open investigations in 2023.
- The Department of Justice and the Securities and Exchange Commission relied heavily on partnerships and close cooperation of over a dozen foreign governments and enforcement agencies, as well as several other U.S. agencies, to successfully complete investigations and bring about enforcement actions.
- The United States showed a moderate increase in enforcement activity in 2023, while the volume of enforcement activity by non-U.S. enforcement agencies dropped from the previous year. Both demonstrate a continuation of a trend set in the last couple of years.
- Globally, the Extractive Industries represent the highest number of bribery enforcement actions, with approximately 25% of all non-U.S. bribery enforcement actions. However, compared to 2022, Financial Services surpassed Extractive Industries in terms of open U.S. investigations concerning bribery of domestic and foreign officials.
- Of the 87 countries conducting investigations concerning alleged bribery of domestic officials, Brazil was conducting the most, followed by India, Nigeria, and China.

**FIG. 01**

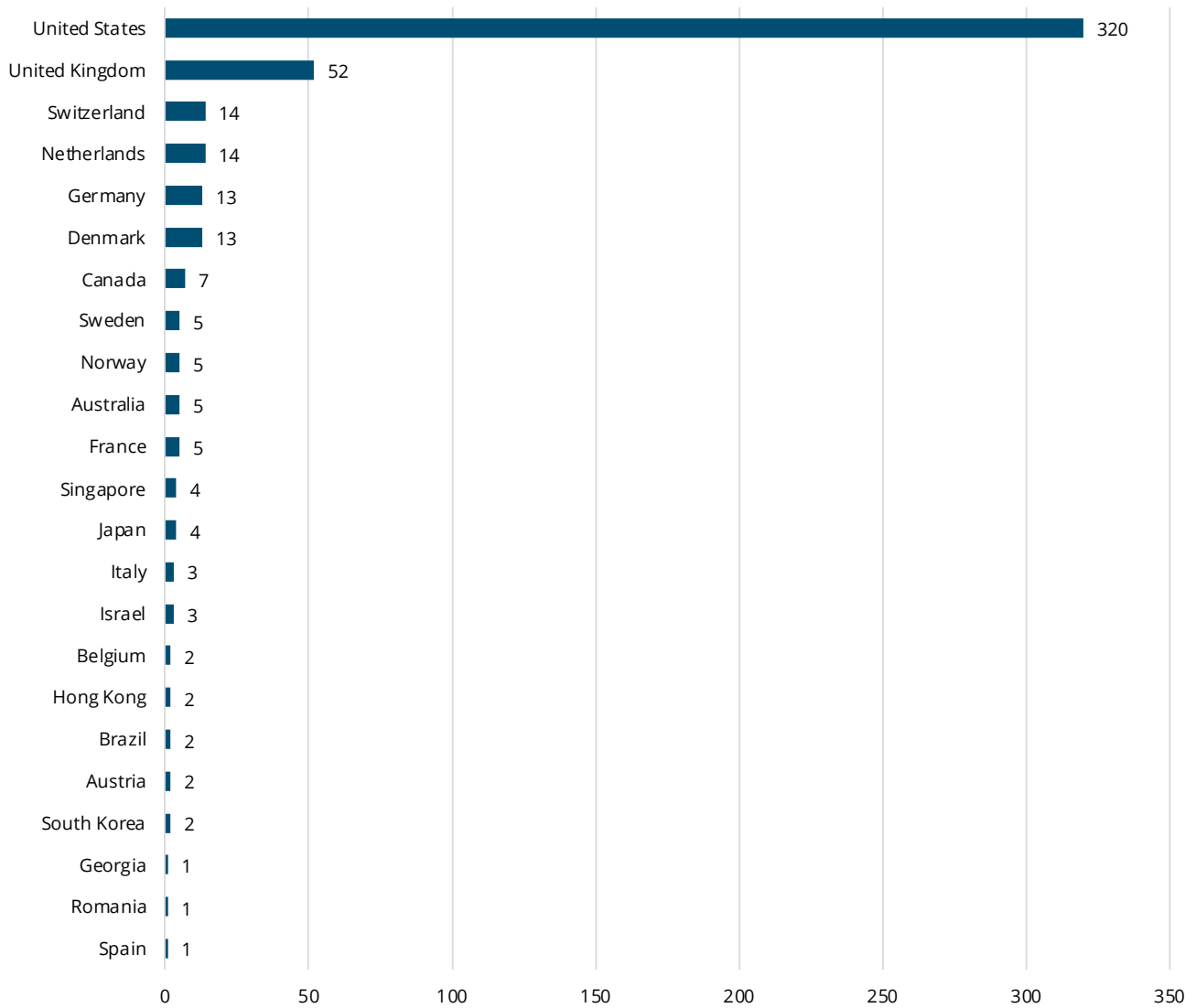
## Investigations Concerning Bribery of Foreign Officials by Country



This chart addresses where investigations of bribery of foreign officials are occurring. In total, there were 256 investigations concerning alleged bribery of foreign officials being conducted by authorities in 37 countries as of 31 December 2023. The United States was conducting 104 investigations, which represents 41% of all ongoing investigations concerning alleged bribery of foreign officials. European countries currently account for approximately 50% of all investigations—a total of 129—while the Asia Pacific region accounts for 5% of ongoing investigations, followed by the Americas (excluding the U.S.) and the Middle East with approximately 1.5% each, and Africa with fewer than 1%.

**FIG. 02**

## Enforcement Actions Concerning Bribery of Foreign Officials by Country



From 1977 through 2023, 23 countries concluded 480 enforcement actions concerning alleged bribery of foreign officials. The United States maintained the strongest enforcement record during this period with 320 enforcement actions, representing approximately 67% of all enforcement actions concerning alleged bribery of foreign official taken to date. Countries in Europe undertook 131 enforcement actions, approximately 27% of all such actions concerning alleged bribery of foreign officials. Countries in Asia Pacific were responsible for approximately 3.5% of the total enforcement actions concerning the alleged bribery of foreign officials, followed by the Americas (excluding the U.S.) with approximately 2% and the Middle East with fewer than 1%.



**FIG. 03**

### Enforcement Actions Concerning Bribery of Foreign Officials 2008–2023

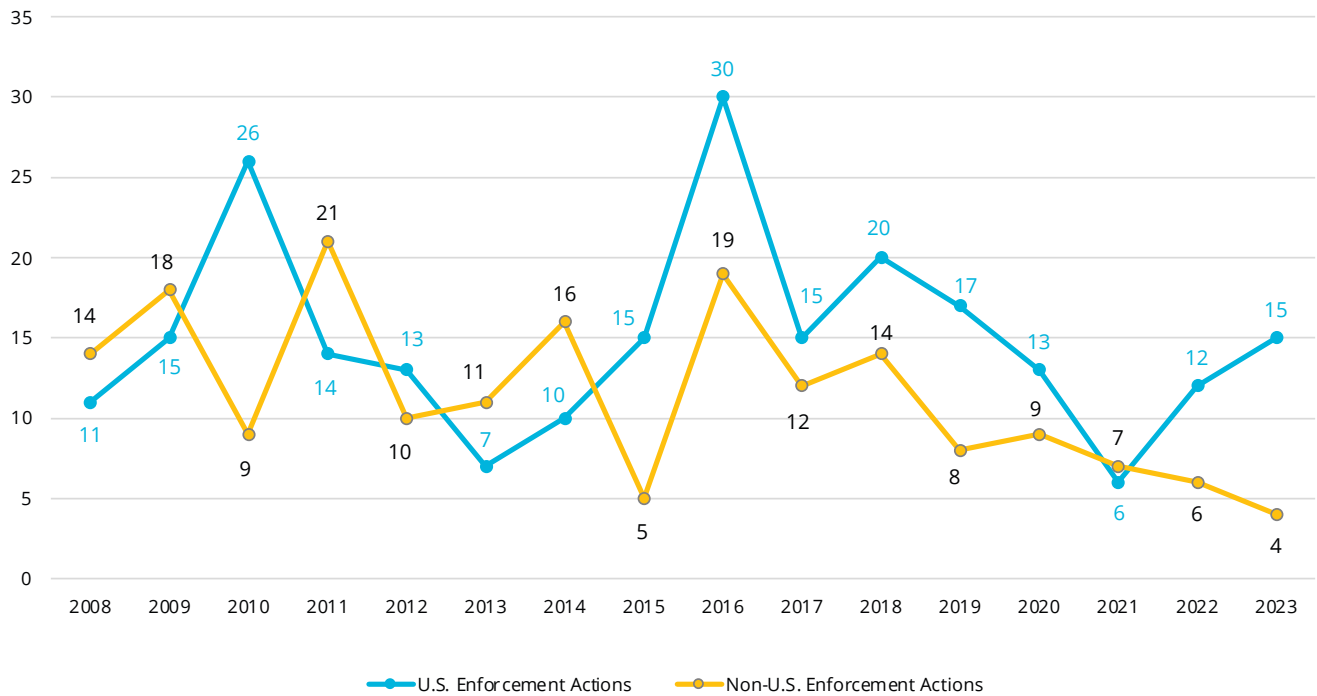
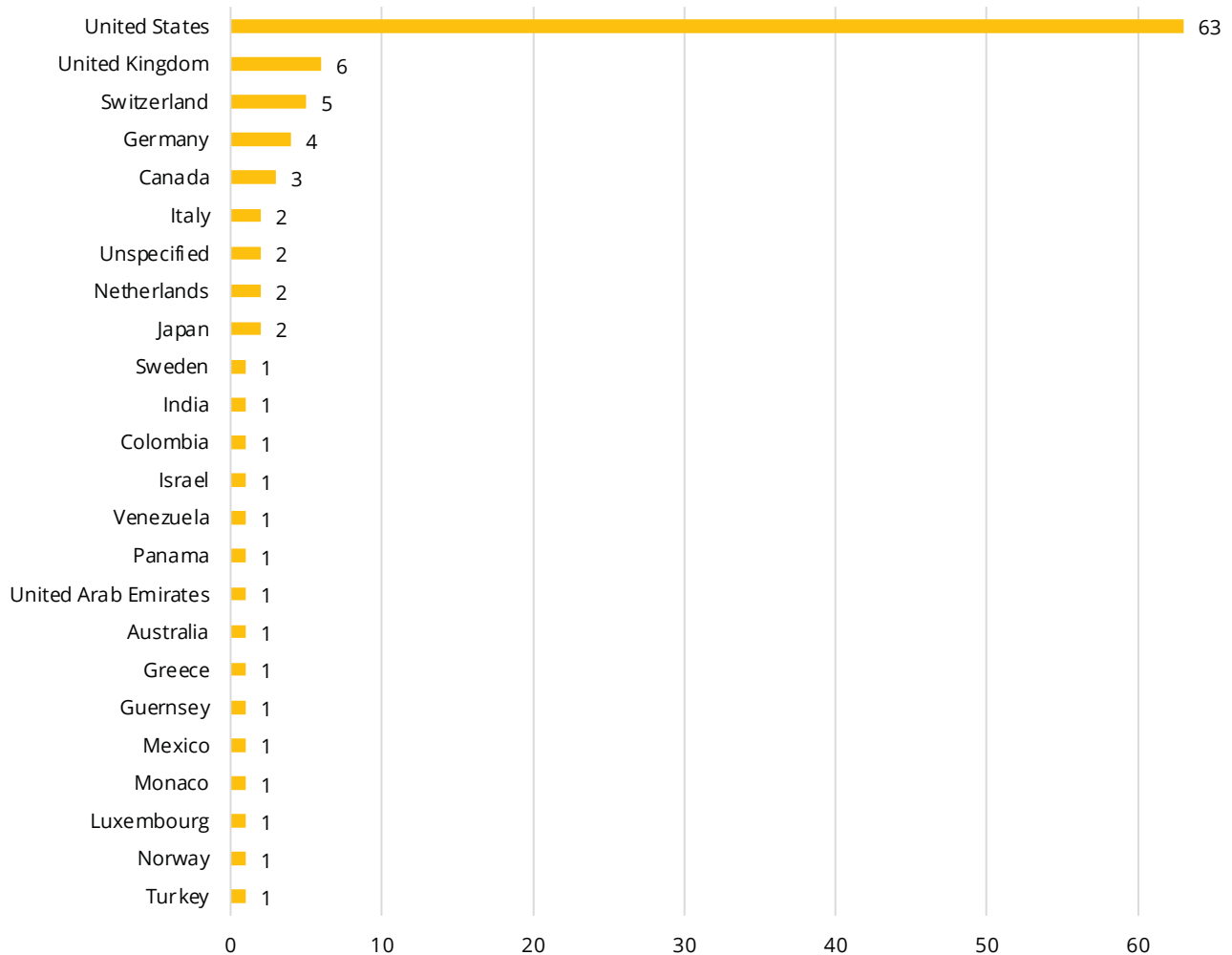


Figure 3 modifies the analysis in Figure 2 to examine enforcement actions concerning alleged bribery of foreign officials undertaken from 2008 through 2023. The United States showed a moderate increase in enforcement activity in 2023, while the volume of enforcement activity by non-U.S. enforcement agencies dropped compared to the previous year.

**FIG. 04**

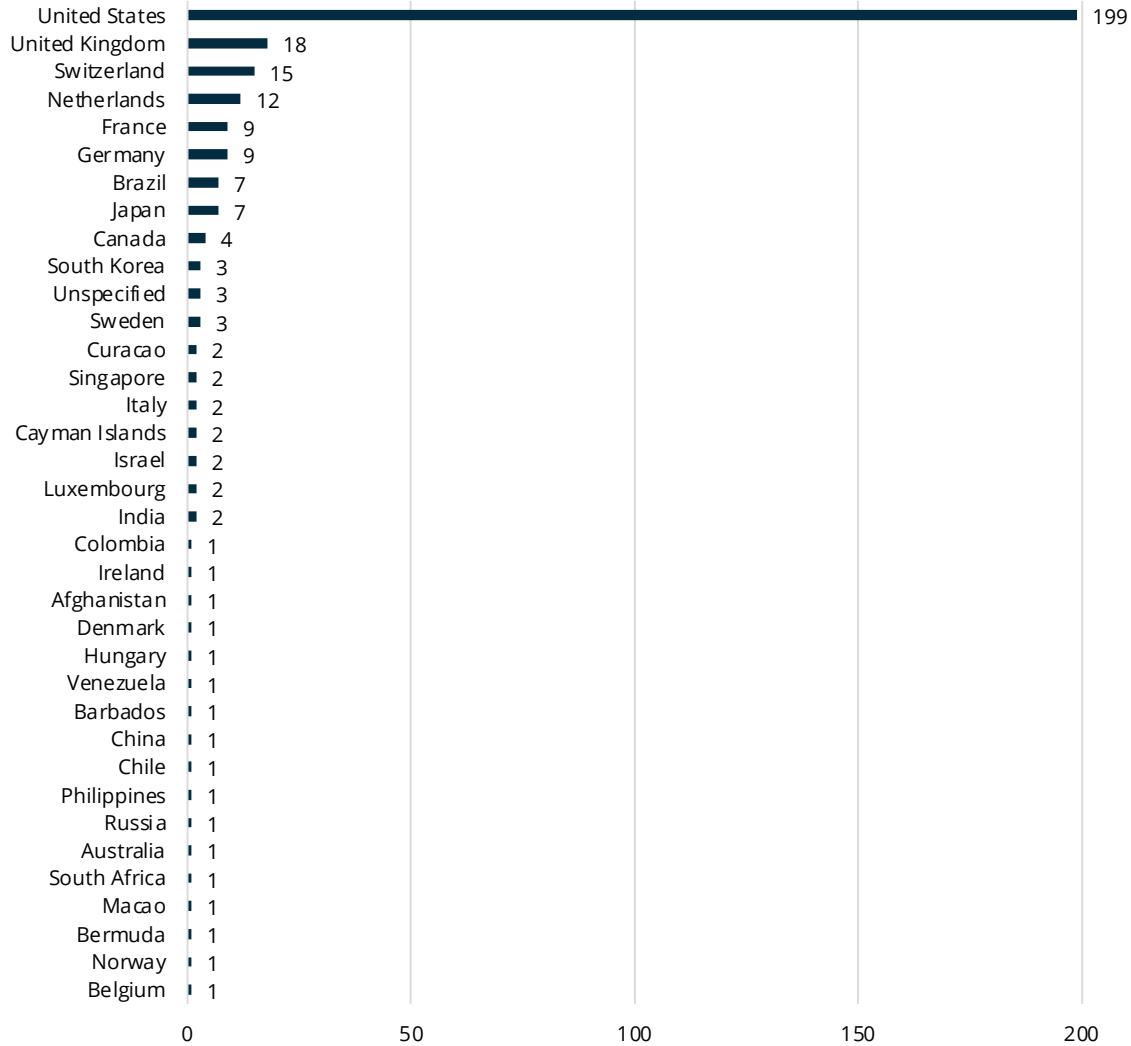
## U.S. Investigations Concerning Bribery of Foreign Officials by Company Headquarters or Individual Citizenship



The United States was conducting 104 investigations concerning alleged bribery of foreign officials in 24 countries as of 31 December 2023. There were 41 investigations concerning alleged bribery of foreign officials involving companies headquartered outside of the United States or individuals with non-U.S. citizenship, representing approximately 61% of all such investigations being conducted by the United States. Of the investigations concerning alleged bribery of foreign officials being conducted against non-U.S. companies and individuals, the highest number involved companies or individuals in the United Kingdom, followed by Switzerland. Companies or individuals from Europe made up approximately 63% of U.S. investigations concerning alleged bribery of a foreign official being conducted against non-U.S. companies and individuals, followed by the Americas (excluding the U.S.) with 17%, Asia Pacific with 10% each, and the Middle East with 5%. The remaining 5% of the population came from unspecified countries.

**FIG. 05**

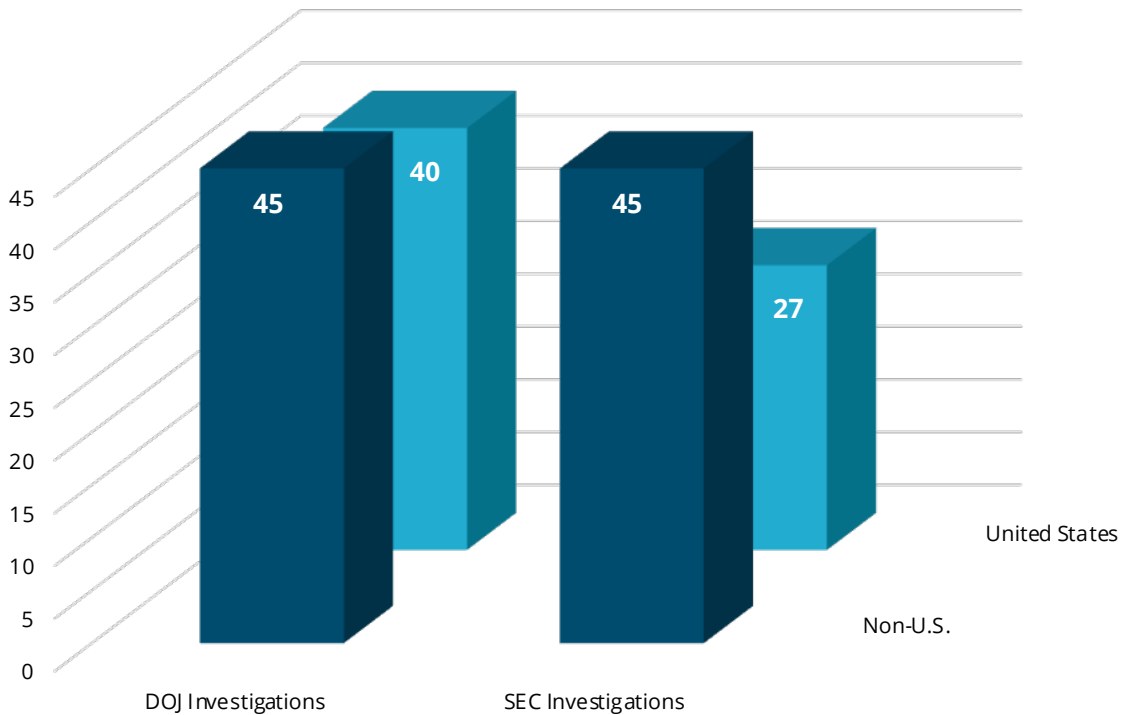
**U.S. Enforcement Actions Concerning Bribery of Foreign Officials by Company Headquarters or Individual Citizenship**



The United States has concluded 320 enforcement actions concerning alleged bribery of foreign officials from 1977–2023. A total of 121 of these enforcement actions have involved companies headquartered outside of the United States or individuals with non-U.S. citizenship, representing approximately 38% of all enforcement actions initiated by the United States concerning alleged bribery of foreign officials. Of the enforcement actions undertaken against non-U.S. companies and individuals, the highest number involved companies or individuals in the United Kingdom, followed by Switzerland and the Netherlands. Companies or individuals from Europe represent approximately 48% of U.S. enforcement actions concerning alleged bribery of foreign officials undertaken against non-U.S. companies and individuals, followed by the Americas (excluding the U.S.) with 14%, Asia Pacific with 9%, the Middle East with 2%, and Africa with 1%.

**FIG. 06**

## U.S. Investigations Concerning Bribery of Foreign Officials by Country of Headquarters

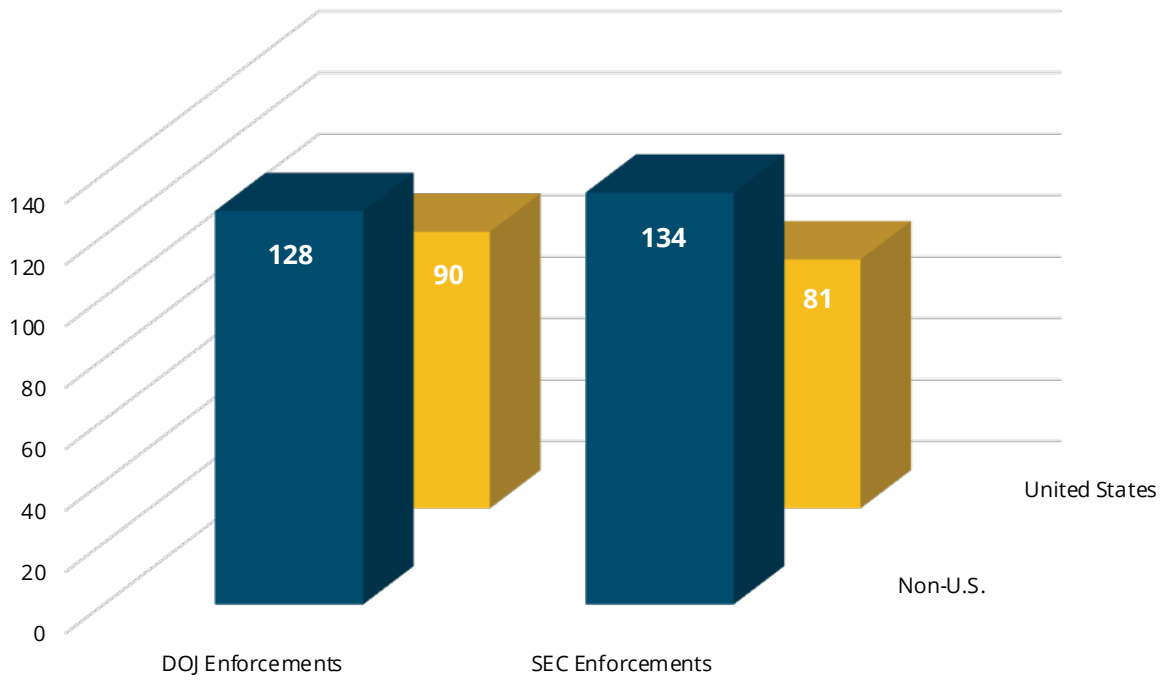


While separate investigations may be conducted by different authorities in one country based on the same circumstances, generally only one such investigation is counted in this report against a company or individual. This chart addresses where separate investigations are conducted by the U.S. Securities and Exchange Commission (SEC) and the U.S. Department of Justice (DOJ).

Between the SEC and the DOJ, the U.S. is conducting a total of 157 foreign bribery investigations, with approximately 57% involving companies headquartered outside of the U.S. or individuals with non-U.S. citizenship. Of those 157, 85 are conducted by the DOJ (54%) and 72 by the SEC (46%). DOJ investigations account for 50% of the total agency investigations involving non-U.S. companies and individuals, and 60% of investigations involving U.S.-based companies and individuals.

**FIG. 07**

## U.S. Enforcement Actions Concerning Bribery of Foreign Officials by Country of Headquarters

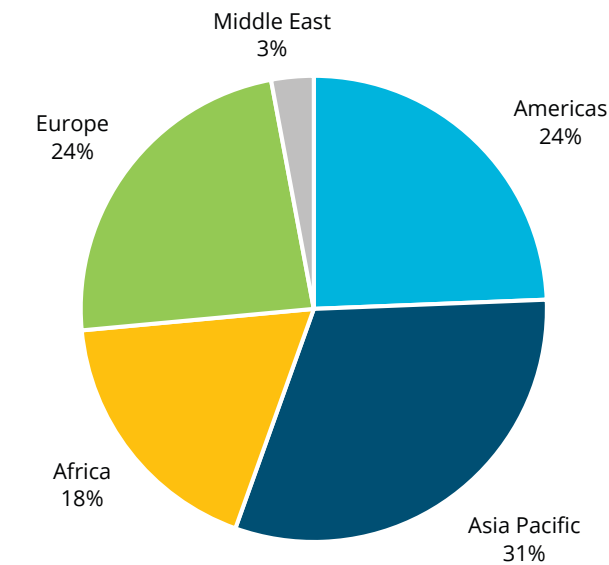


While separate enforcement actions may be taken by different authorities in one country based on the same circumstances, generally only one such enforcement action is counted in this report against a company or individual. This chart addresses separate enforcement actions taken by the SEC and the DOJ.

Between the SEC and the DOJ, the U.S. has concluded 433 enforcement actions concerning the alleged bribery of foreign officials, with 262—approximately 61%—involving companies headquartered outside of the U.S. or individuals with non-U.S. citizenship. The SEC has remained more active in prosecuting U.S.-based companies (41% to 38%). With respect to non-U.S.-based companies and individuals, the SEC has concluded the greater number of enforcement actions, at a ratio of approximately 62% to 59%.

**FIG. 08**

## Investigations Concerning Bribery of Domestic Officials by Country



Brazil - 30  
 India - 15  
 Nigeria - 12  
 China - 10  
 Indonesia - 9  
 Poland - 8  
 Philippines - 6  
 Thailand - 6  
 Argentina - 6  
 Malaysia - 6  
 Greece - 5  
 Malawi - 4  
 Croatia - 4

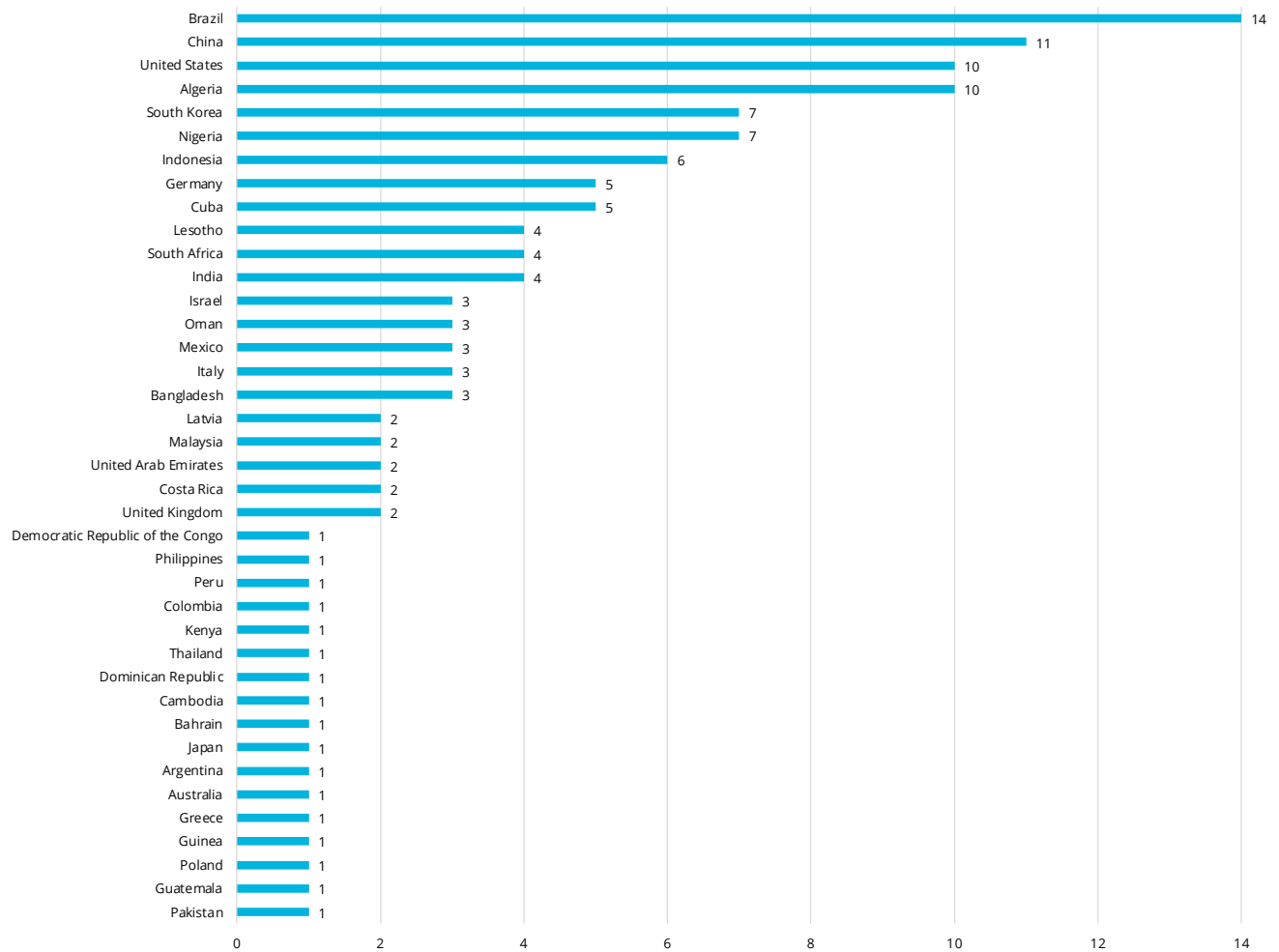
South Africa - 4  
 Hungary - 4  
 Italy - 4  
 Mexico - 3  
 United States - 3  
 Vietnam - 3  
 Iraq - 3  
 France - 3  
 Colombia - 3  
 Algeria - 3  
 Guatemala - 3  
 Nepal - 3  
 Cyprus - 2

Kenya - 2  
 Bangladesh - 2  
 Czech Republic - 2  
 Russia - 2  
 Sri Lanka - 2  
 Venezuela - 2  
 Hong Kong - 2  
 Lesotho - 2  
 Romania - 2  
 Israel - 2  
 Macedonia - 2  
 Liberia - 2  
 Kyrgyzstan - 2  
 Zambia - 2  
 Canada - 2  
 Portugal - 2  
 Turkey - 2  
 Austria - 2  
 United Kingdom - 1  
 Tunisia - 1  
 Denmark - 1  
 Peru - 1  
 Rwanda - 1  
 Uganda - 1  
 Bermuda - 1  
 Maldives - 1  
 Bahrain - 1  
 Armenia - 1  
 Namibia - 1  
 Latvia - 1  
 Egypt - 1  
 Serbia - 1  
 South Korea - 1  
 Bolivia - 1  
 Mongolia - 1  
 Switzerland - 1  
 Norway - 1  
 Samoa - 1  
 Bulgaria - 1  
 Tanzania - 1  
 Montenegro - 1  
 Slovenia - 1  
 Spain - 1  
 Somalia - 1  
 New Zealand - 1  
 Panama - 1  
 Ecuador - 1  
 Mozambique - 1  
 Dominican Republic - 1  
 Mauritania - 1  
 Monaco - 1  
 Guinea - 1  
 Sierra Leone - 1  
 Bahamas - 1  
 Ghana - 1  
 Australia - 1  
 Slovakia - 1  
 Japan - 1  
 Kuwait - 1  
 Antigua and Barbuda - 1  
 Chile - 1

Of the 87 countries conducting investigations concerning alleged bribery of domestic officials as of 31 December 2023, Brazil was conducting the most, followed by India, Nigeria, and China. Countries in Asia Pacific accounted for approximately 31% of all such investigations, followed by the Americas and Europe with 24% each, Africa with approximately 18%, and the Middle East with approximately 3%. Of the 16 countries conducting four or more investigations concerning alleged bribery of domestic officials, 6 are in Asia Pacific, 5 are in Europe, 2 in the Americas, and 3 in Africa. Of the 71 countries conducting between one and three investigations concerning alleged bribery of domestic officials, 21 are in Europe, 17 are in Africa, 14 in the Americas, 14 in Asia Pacific, 4 in the Middle East and 1 In the United States.

**FIG. 09**

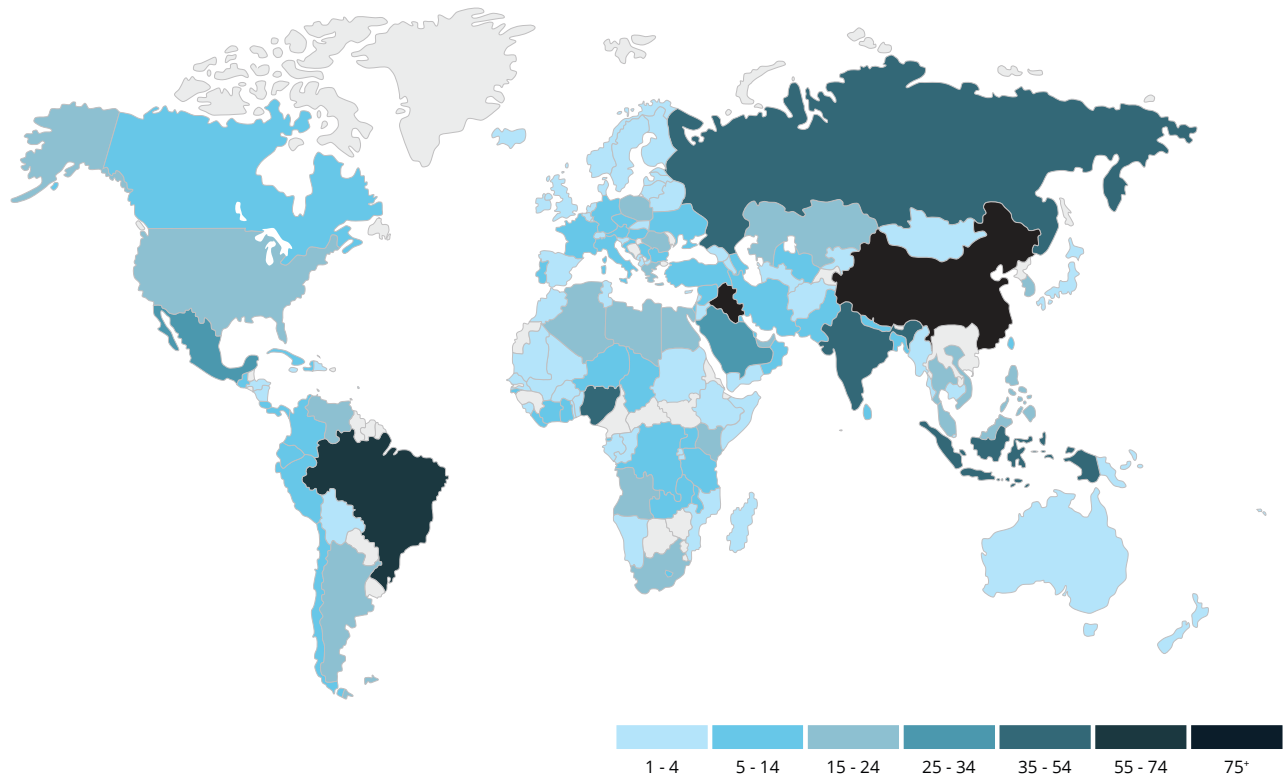
## Enforcement Actions Concerning Bribery of Domestic Officials by Country



As of 31 December 2023, there were almost twice as many investigations (256) as there have been enforcement actions concerning alleged bribery of domestic officials from 1977–2023 (129). Brazil and China have brought the most enforcement actions concerning alleged bribery of domestic officials, followed by United States, then Algeria, Nigeria, and Indonesia. Countries in Asia Pacific have undertaken 30% of the enforcement actions concerning alleged bribery of domestic officials, followed by Africa and the Americas, excluding United States, with 22% each, Europe with 14%, United States with 10%, and the Middle East with 9%. Twelve countries had undertaken seven or more enforcement actions: 2 in Africa, 2 in Asia Pacific, and 2 in the Americas. Six countries had undertaken between four and six enforcement actions: 4 in Africa, 4 in Asia Pacific, 2 in the Americas (excluding the USE), and 1 each in the US and Europe. Of the 27 countries that had undertaken between one and three enforcement actions concerning alleged bribery of domestic officials, 8 are in Asia Pacific, 7 in the Americas, 5 in Europe, 4 in the Middle East, and 3 in Africa.

**FIG. 10**

## Prevalence of Bribery 1977–2023



This Figure shows the prevalence of alleged bribery of government officials. Each country indicated on the map has a corresponding number of enforcement events concerning the alleged bribery of that country's government officials. China surpasses every other country, with Chinese officials being the alleged recipients of bribes in more than 123 different enforcement events. Brazil and Iraq have the next-highest numbers of enforcement events, followed by Nigeria, India, and Indonesia. Officials in Africa were the alleged recipient of bribes in approximately 30% of enforcement events, followed by Asia Pacific and Europe with 22% of enforcement events each, followed by Americas with 17%, the Middle East with 9%, and the remainder split between the United States and unspecified countries. Sixteen countries had more than 20 enforcement events, with 7 in Asia Pacific, 2 in Africa, the Americas and the Middle East, and 1 in Europe and the United States. There were 21 countries with between 11 and 20 enforcement events: 7 in Africa, 5 in Europe, 3 in Asia Pacific, 3 in the Americas, and 3 in the Middle East. There were 121 countries with between 1 and 10 enforcement events: 38 in Africa, 28 in Europe, 24 in Asia Pacific, 22 in the Americas, and 9 in the Middle East.

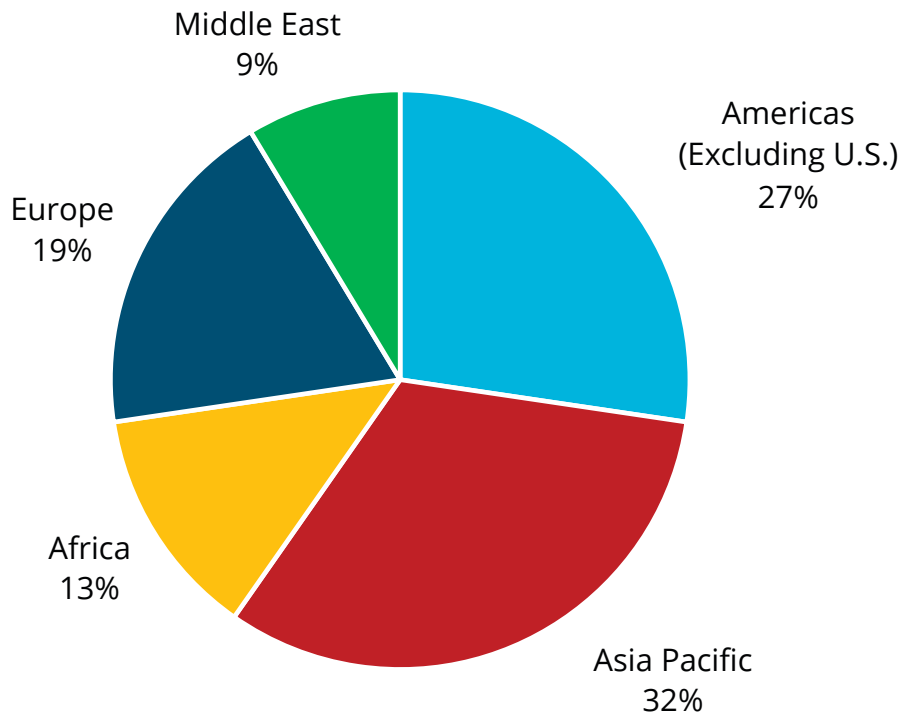
There were 94 enforcement events where the nationality of the government officials who were allegedly bribed is unspecified. This is because the information is taken from publicly available resources, and there may be instances where companies do not specify information about where alleged bribery took place.



Afghanistan - 1	Ghana - 12	Northern Ireland - 1
Albania - 2	Greece - 17	Norway - 2
Algeria - 18	Guatemala - 6	Oman - 7
Angola - 20	Guinea - 9	Pakistan - 7
Antigua and Barbuda - 1	Haiti - 6	Panama - 9
Argentina - 20	Honduras - 4	Papua New Guinea - 1
Armenia - 1	Hong Kong - 3	Peru - 8
Aruba - 1	Hungary - 10	Philippines - 17
Australia - 3	India - 54	Poland - 19
Austria - 8	Indonesia - 44	Portugal - 5
Azerbaijan - 14	Iran - 9	Qatar - 6
Bahamas - 1	Iraq - 83	Republic of the Congo - 4
Bahrain - 7	Israel - 7	Romania - 16
Bangladesh - 14	Italy - 17	Russia - 40
Barbados - 4	Ivory Coast - 8	Rwanda - 4
Belarus - 1	Jamaica - 2	Samoa - 1
Belgium - 1	Japan - 3	Sao Tome and Principe - 1
Benin - 2	Jordan - 3	Saudi Arabia - 31
Bermuda - 1	Kazakhstan - 25	Senegal - 4
Bolivia - 4	Kenya - 16	Serbia - 6
Bosnia and Herzegovina - 1	Kuwait - 12	Sierra Leone - 1
Brazil - 83	Kyrgyzstan - 3	Slovakia - 2
Bulgaria - 5	Latvia - 5	Slovenia - 3
Burkina Faso - 2	Lebanon - 2	Somalia - 1
Burundi - 2	Lesotho - 6	Somaliland - 1
Cambodia - 4	Liberia - 6	South Africa - 23
Cameroon - 3	Libya - 20	South Korea - 21
Canada - 7	Lithuania - 2	South Sudan - 2
Chad - 4	Luxembourg - 1	Spain - 3
Chile - 5	Macao - 1	Sri Lanka - 5
China - 123	Macedonia - 2	Sudan - 2
Colombia - 12	Madagascar - 1	Switzerland - 1
Comoro Islands - 1	Malawi - 5	Syria - 7
Cook Islands - 1	Malaysia - 24	Taiwan - 7
Costa Rica - 9	Maldives - 1	Tanzania - 9
Croatia - 8	Mali - 3	Thailand - 23
Cuba - 5	Mauritania - 4	Togo - 1
Cyprus - 2	Mexico - 37	Trinidad and Tobago - 2
Czech Republic - 6	Micronesia - 1	Tunisia - 4
Democratic Republic of the Congo - 11	Monaco - 2	Turkey - 19
Denmark - 1	Mongolia - 4	Turkmenistan - 2
Djibouti - 1	Montenegro - 2	Turks & Caicos Islands - 2
Dominican Republic - 4	Morocco - 3	Uganda - 9
Ecuador - 10	Mozambique - 4	Ukraine - 7
Egypt - 19	Myanmar - 1	United Arab Emirates - 18
Equatorial Guinea - 7	Namibia - 2	United Kingdom - 4
Ethiopia - 2	Nauru - 1	United States - 21
France - 6	Nepal - 6	Unspecified - 94
French Polynesia - 1	Netherlands - 1	Uzbekistan - 8
Gabon - 4	New Zealand - 1	Venezuela - 20
Georgia - 4	Nicaragua - 2	Vietnam - 16
Germany - 10	Niger - 5	Yemen - 3
	Nigeria - 56	Zambia - 5

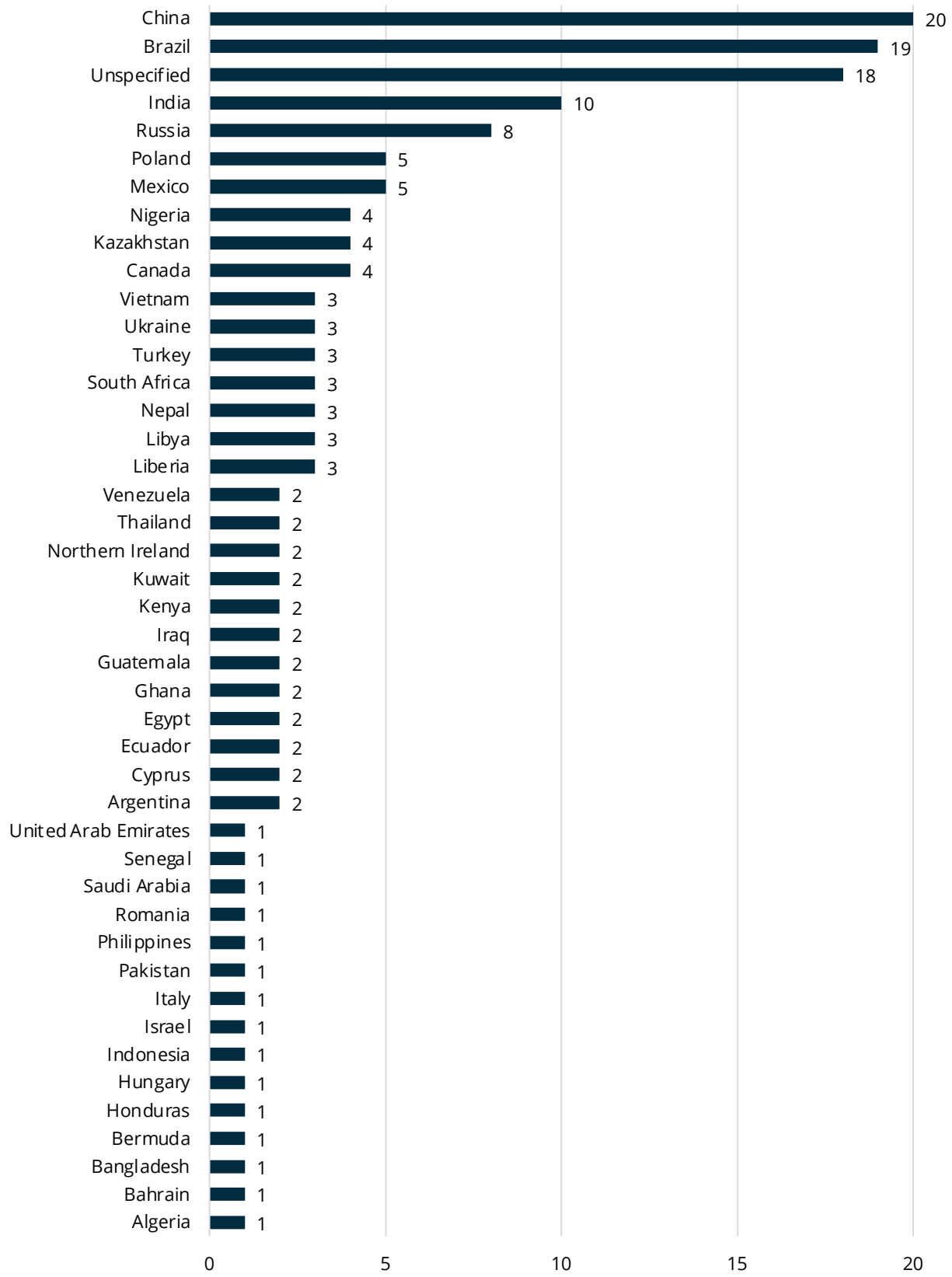
**FIG. 11**

## Total Investigations Concerning Bribery by Companies Headquartered in the U.S.



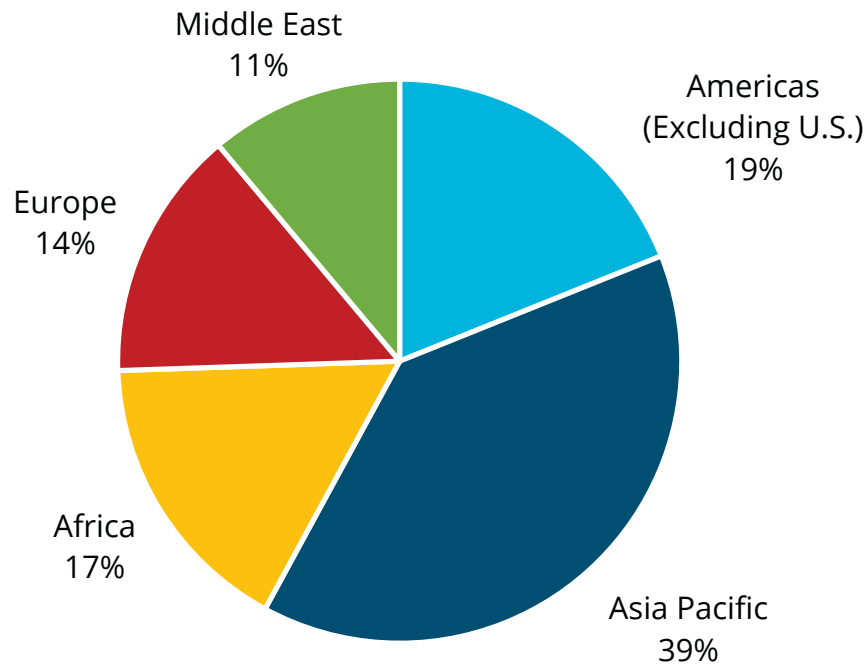
This Figure shows the regions, encompassing 44 countries, where U.S.-based companies under investigation as of 31 December 2023 have allegedly paid bribes. Chinese officials are the alleged recipients of bribes in 20 investigations, followed by Brazil. Officials in Asia Pacific were the alleged recipients of bribes in approximately 32% of investigations, followed by the Americas (excluding the U.S.) with approximately 27%, Europe with approximately 19%, Africa with approximately 13%, and the Middle East with 9%. Three countries were implicated in more than 10 investigations: 1 in Asia Pacific, 1 in the Americas (excluding the U.S.) and 1 in an unspecified region. There were 41 countries implicated in between one and ten investigations: 9 in Europe, 8 in Africa, 8 in Asia Pacific, 8 in the Americas (excluding the U.S.), and 8 in the Middle East.

There were 18 investigations where the nationality of the government officials who were allegedly bribed is unspecified. This is because the information is taken from publicly available resources, and there may be instances where companies do not specify information about where alleged bribery took place.



**FIG. 12**

## Total Enforcement Actions Concerning Bribery by Companies Headquartered in the U.S.



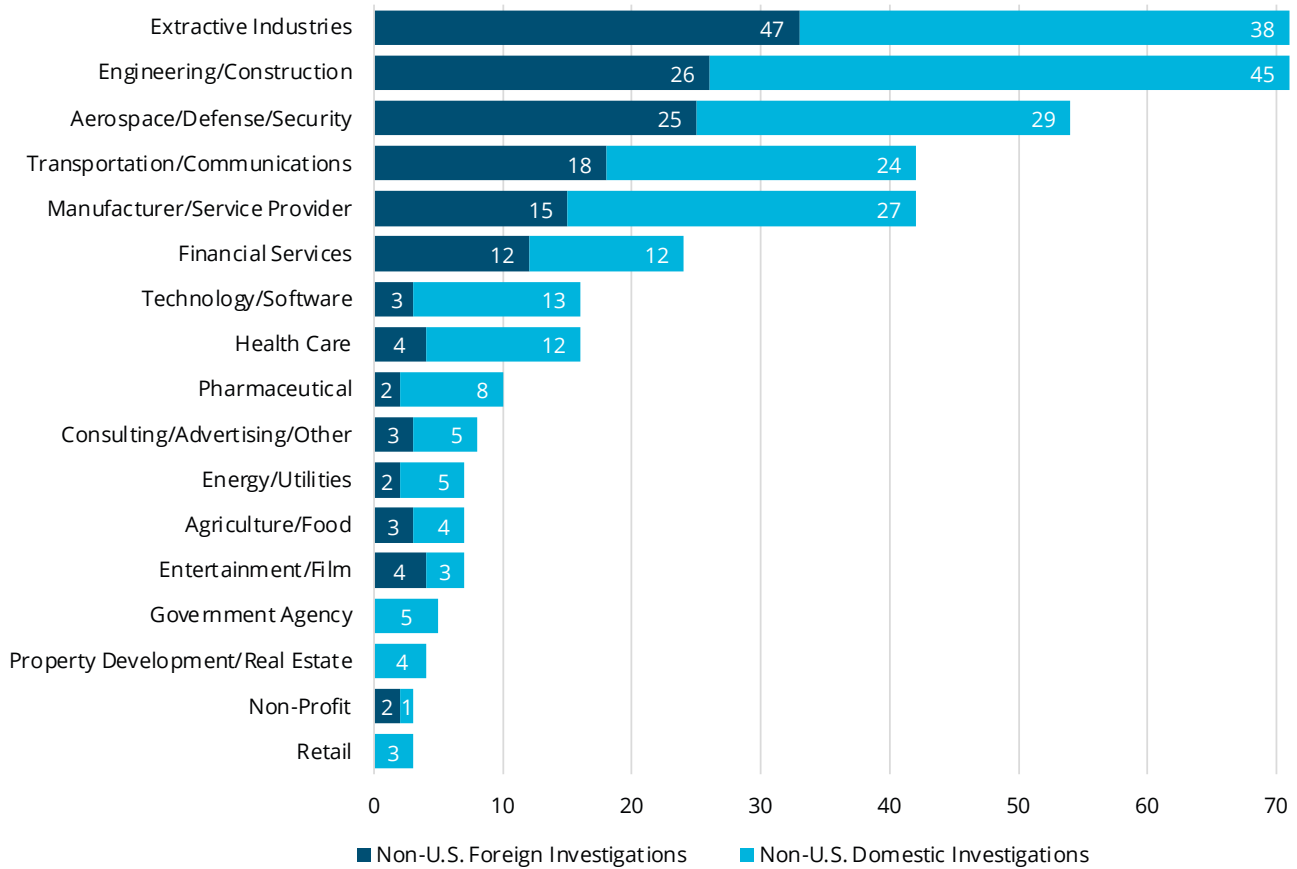
This Figure shows the 103 countries where U.S.-based companies who were subject to an enforcement action between 1977 and 2023 allegedly paid bribes. Chinese officials are the alleged recipients of bribes in 55 enforcement actions, followed by Nigeria, Mexico, Iraq, India and Indonesia. Officials in Asia Pacific were the alleged recipients of bribes in approximately 39% of enforcement actions, followed by the Americas (excluding the U.S.) with approximately 18.9%, Africa with approximately 17%, Europe with approximately 14%, and the Middle East with approximately 11%. Ten countries were implicated in more than 10 enforcement actions: 4 in Asia Pacific, 2 in the Americas (excluding the U.S.), 2 in Africa, and 1 each in Europe and the Middle East. There were 92 countries implicated in between one and ten enforcement actions: 26 in Africa, 19 in Europe, 19 in Asia Pacific, 18 in the Americas (excluding the U.S.), and 9 in the Middle East.

There were 7 enforcement actions where the nationality of the government officials who were allegedly bribed is unspecified. This is because the information is taken from publicly available resources, and there may be instances where companies do not specify information about where alleged bribery took place.

Algeria - 1	Hungary - 1	Peru - 2
Angola - 6	India - 18	Philippines - 4
Argentina - 9	Indonesia - 17	Poland - 6
Aruba - 1	Iran - 1	Qatar - 1
Azerbaijan - 5	Iraq - 18	Republic of the Congo - 1
Bahrain - 3	Israel - 2	Romania - 4
Bangladesh - 6	Italy - 2	Russia - 13
Barbados - 1	Ivory Coast - 2	Rwanda - 1
Belgium - 1	Jamaica - 1	Saudi Arabia - 9
Benin - 1	Japan - 1	Senegal - 1
Bolivia - 1	Kazakhstan - 6	Serbia - 1
Brazil - 15	Kenya - 1	South Africa - 2
Bulgaria - 3	Kuwait - 5	South Korea - 6
Burkina Faso - 1	Kyrgyzstan - 1	Spain - 1
Canada - 1	Liberia - 1	Sri Lanka - 1
Chad - 1	Libya - 3	Taiwan - 2
Chile - 1	Lithuania - 1	Tanzania - 1
China - 55	Luxembourg - 1	Thailand - 13
Colombia - 2	Macao - 1	Trinidad and Tobago - 1
Cook Islands - 1	Malawi - 1	Turkey - 7
Costa Rica - 3	Malaysia - 7	Uganda - 1
Croatia - 1	Mali - 1	Ukraine - 2
Czech Republic - 1	Mauritania - 1	United Arab Emirates - 6
Democratic Republic of the Congo - 2	Mexico - 18	United Kingdom - 2
Dominican Republic - 2	Micronesia - 1	United States - 1
Ecuador - 3	Mongolia - 1	Unspecified - 7
Egypt - 11	Morocco - 1	Uzbekistan - 1
Equatorial Guinea - 1	Mozambique - 1	Venezuela - 8
France - 2	Myanmar - 2	Vietnam - 8
Gabon - 2	Nepal - 2	Yemen - 1
Germany - 5	Netherlands - 1	
Ghana - 2	Nicaragua - 2	
Greece - 6	Niger - 2	
Guinea - 3	Nigeria - 18	
Haiti - 4	Oman - 1	
Honduras - 1	Pakistan - 6	
	Panama - 4	

**FIG. 13**

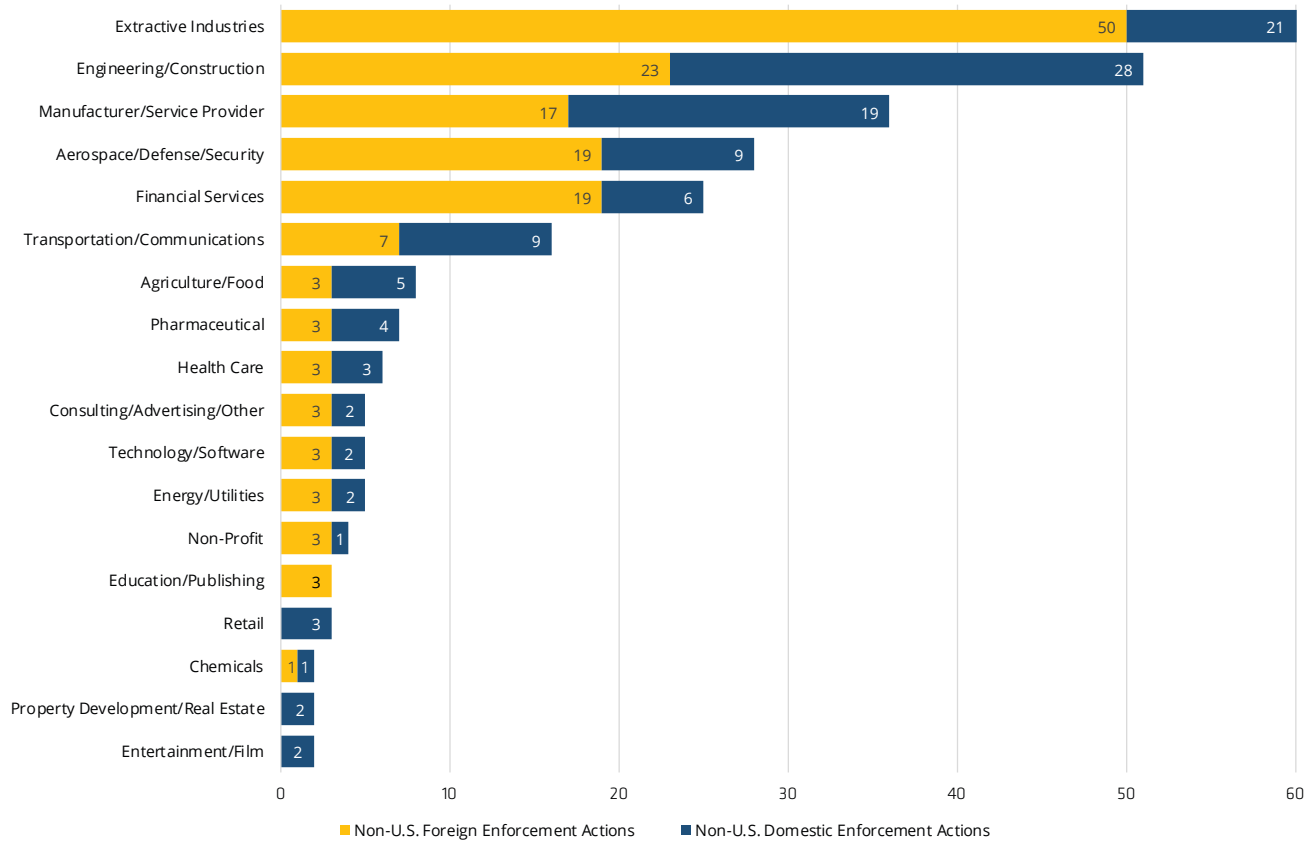
## Total Investigations Concerning Bribery of Domestic and Foreign Officials by Industry (excluding United States)



This Figure shows the industries that are subjects of the most investigations of alleged bribery of foreign or domestic officials, excluding investigations being conducted by the United States, as of 31 December 2023. The Extractive Industries and Engineering/Construction represent the highest number of bribery investigations, with 18% of all non-U.S. investigations, followed by Aerospace/Defense/Security with approximately 14%, and Transportation/Communication with 11%.

**FIG. 14**

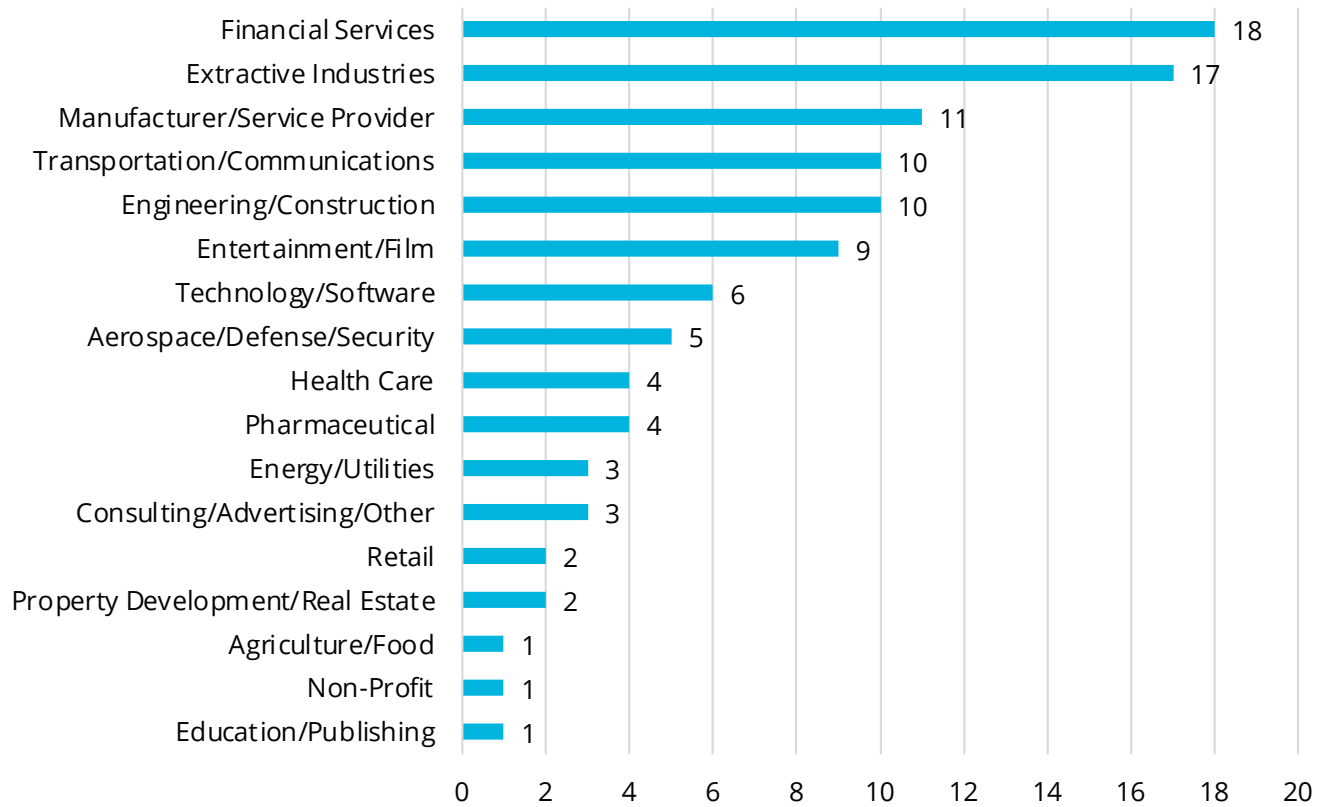
## Total Enforcement Actions Concerning Bribery of Domestic and Foreign Officials by Industry (excluding United States)



This Figure shows the industries that have experienced the most enforcement actions concerning alleged bribery of domestic or foreign officials, excluding enforcement actions brought by the United States, from 1977 through 2023. The Extractive Industries represent the highest number of bribery enforcement actions, with approximately 25% of all non-U.S. bribery enforcement actions, followed by Engineering/Construction with approximately 18% and Manufacturer/Service Provider with approximately 13%.

**FIG. 15**

## U.S. Investigations Concerning Bribery of Domestic and Foreign Officials by Industry

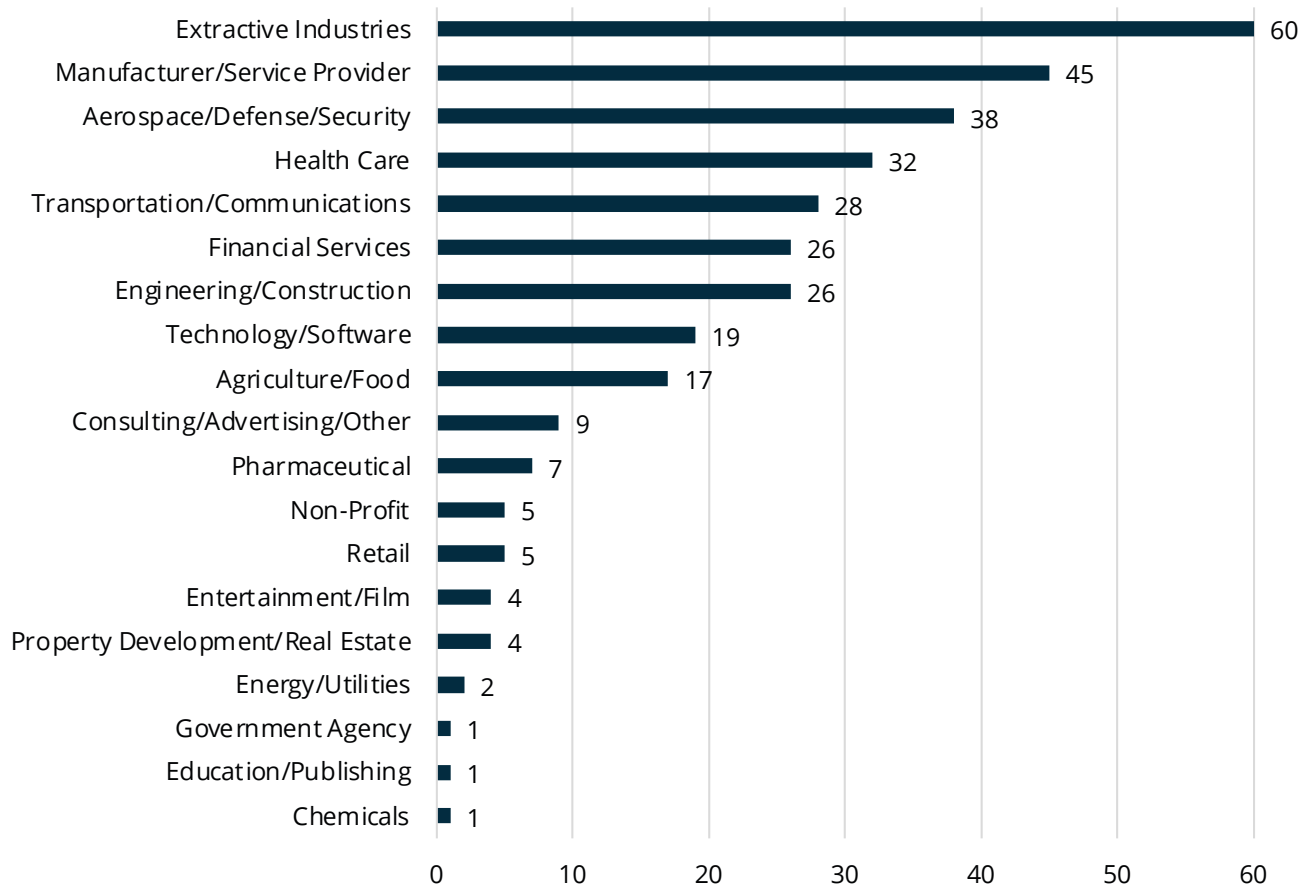


This Figure shows U.S. investigations concerning alleged bribery of domestic and foreign officials as of 31 December 2023, separated by industry. The Financial Services faced the most investigations, with approximately 18% of all U.S. investigations, followed by Extractive Industries with 17% and Manufacturer/Service Provider at 11% and Engineering/Construction, Transportation/Communications with 10% each.



**FIG. 16**

## U.S. Enforcement Actions Concerning Bribery of Domestic and Foreign Officials by Industry






This Figure shows U.S. enforcement actions concerning alleged bribery of domestic and foreign officials from 1977 through 2023, separated by industry. The Extractive Industries have seen the most enforcement actions, with 18% of all such U.S. enforcement actions, followed by Manufacturer/Service Provider with 14% and Aerospace/Defense/Security with 12%.

TRACE is a non-profit international business association dedicated to anti-bribery, compliance and good governance. Founded in 2001 to make it easier and less expensive for companies to navigate and mitigate business bribery risk, TRACE is credited with establishing anti-bribery standards that have been adopted by hundreds of companies worldwide. Driven by the needs of its members, TRACE is continuously developing tools and resources that power compliance programs. TRACE is headquartered in the United States and registered in Canada, with a presence on four continents.

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