Anti-corruption enforcement activity is increasingly global. Companies must comply with international anti-bribery laws or risk severe penalties while facing growing public expectations of good ethical behavior and pressure from stakeholders to improve results.
Leading the way in anti-corruption compliance

FTI Consulting’s Anti-Corruption Investigations & Compliance team provides leading global capabilities to help companies mitigate corruption risk and investigate and prevent corruption issues. Our specialists advise internal and external counsel, government appointed monitors and corporate compliance officers, and help our clients respond to multi-jurisdictional matters arising from alleged violations of the Foreign Corrupt Practices Act (“FCPA”), the UK Bribery Act (“UKBA”), and related global statutes. Our services fall into three broad categories: corruption risk mitigation; investigation of allegations; and assistance with remediation.

**RISK MITIGATION**

We work with our clients to conduct proactive investigations, enhance compliance programs and perform value-added analysis that help decision-makers address and mitigate specific corruption risks. Our multidisciplinary team:

- designs and implements risk-based compliance programs
- performs geopolitical risk assessments and market entry analysis
- conducts integrity investigations of pre-acquisition targets, agents, resellers and other third parties, including politically-exposed-persons (PEPs)
- offers FTI COMPLY, an online compliance tool to organize, monitor and centrally manage third-party due diligence
- performs post-acquisition and third-party compliance audits
- trains employees on corporate anti-corruption policies and corporate governance officers on incident response protocols

**INVESTIGATION**

We offer support at every stage of a corruption investigation including:

- collecting information through publicly available material, conducting interviews and investigating beneficial relationships
- identifying and preserving electronic data and hard copy records
- analyzing data and uncovering relevant documents and information using advanced analytics applied to unstructured data and state-of-the-art tools to analyze structured data sets
- reconstructing accounting records
- combining output with information and evidence gathered elsewhere to establish the fact pattern
- producing a report for key stakeholders based on our investigation that answers the who, what, where, when, how and why
- identifying control weaknesses and potential gaps in the anti-corruption compliance program and accounting internal controls
- providing information to assist outside counsel on the appropriate case strategy
- creating a crisis communications strategy and tactical implementation plan

**REMEDIATION**

Following a corruption investigation we can:

- quantify the proceeds of corruption for disgorgement and recovery purposes
- calculate the company’s ability to pay fines to support legal counsel in negotiations with regulators
- act as an independent compliance consultant reporting to the Board
- assist a court-appointed monitor pursuant to a settlement agreement or prosecution
- develop and implement remediation plans to address control weaknesses in a particular business or systemic issues across the anti-corruption compliance program
- develop or modify anti-corruption policies and procedures
Anti-corruption investigations

Our multi-disciplinary team of specialist investigators, forensic accountants, data analysts and computer forensic experts work collaboratively to reveal the facts underlying a corruption investigation.

**HOW WE CAN HELP**

When a corruption allegation needs investigating, our integrated team, with a mix of specialist skills and industry expertise, can assist by:

- quickly assessing the situation
- designing a tailored, scaled work plan delivered in a phased and cost-effective manner
- providing advice that is built on a robust evidence base, grounded in rigorous analysis and supported by FTI Consulting’s deep experience
- using discrete processes that do not interrupt the regular course of business
- accessing proprietary sources of intelligence that may not always be publicly available

**GLOBAL PRESENCE**

FTI Consulting’s global presence means we can deploy teams anywhere in the world, helping you respond to a corruption investigation by providing:

- local experts in 28 countries, including all major finance capitals
- multi-lingual capabilities
- in-country IT forensic capabilities to manage data hosting and privacy issues
- familiarity with local customs and business practices

**COMMERCIAL APPROACH**

An investigation can be challenging and stressful for a business which is why our approach is based on commerciality and pragmatism. We help resolve matters with minimum disruption to the business using:

- tact and sensitivity when interviewing staff and witnesses
- speed and efficiency when mobilizing on-site teams
- discretion and flexibility when collecting confidential data
- open and regular communication with key stakeholders
- recommendations based on what’s best for the business
Internationally recognized leaders in forensic investigations


Recognized as having the deepest and strongest capabilities in Forensic Investigations by Kennedy Consulting Research & Advisory

Ringtail®, our e-discovery platform recognized as a top online review platform in the 2015 Best of The National Law Journal reader rankings.
Support at every stage of an investigation

Corruption investigations can vary widely, have sudden changes in scope, and are often time-critical. They require immediate, decisive action and specialist support from experts to help you respond effectively and efficiently. Whatever help you need, our multi-disciplinary team can assist at every stage of an investigation – tailoring our services to match the specific requirements of the case.

**INFORMATION COLLECTION**
- Search of publicly available material, along with our own discreet source inquiries
- Conduct interviews
- Investigate beneficial relationships
- Identify and preserve data from servers, computers, mobile phones and other forms of electronic media
- Preserve hard copy and electronic accounting records
- Map relationships and ownership structures

**ELECTRONIC DATA REVIEW & ANALYSIS**
- Use advanced analytics through Ringtail, FTI’s document review platform, to help identify the relevant documents quickly
- Uncover activity on devices, including recovery of deleted items and attempts to wipe data
- Use various tools to analyze structured data sets of any size to establish patterns and anomalies
- Reconstruct accounting records
- Combine output with information and evidence gathered elsewhere, to verify the fact pattern and establish any discrepancies needing further investigation

**RECOMMENDATIONS & FINDINGS**
- Produce a report for key stakeholders (e.g. senior management and the board, legal advisors, regulators or the court), based on our investigation that answers the who, what, where, when, how and why
- Identify control weaknesses
- Provide information to assist lawyers on the appropriate case strategy and advise on possible next steps
- Create a crisis communications strategy and tactical implementation plan
Support at every stage of an investigation

**COURT/REGULATOR**

- Calculate additional profits earned on transactions under scrutiny
- Provide expert reports based on independent, supportable analysis
- Conduct ability-to-pay assessments to support legal counsel in plea negotiations
- Work as an independent compliance consultant reporting to the board
Our recent anti-corruption cases
About FTI Consulting

Advisor to the world's top 10 bank holding companies

Founded in 1982 and $1.7BLN equity market capitalisation*

Combines unparalleled expertise and industry knowledge to address critical challenges for clients

With more than 4,600 employees and offices in 28 countries on six continents, our breadth and depth extends across every major social, political and economic hub around the globe

We are a global advisory firm that provides multi-disciplinary solutions to complex challenges and opportunities

47 of Global 100 corporations are clients

Advisor to 94 of the world's top 100 law firms

Our largest industry groups are: Energy, Power & Products; Financial Institutions & Insurance; Healthcare & Life Science; Real Estate; Retail & Consumer; and Telecom, Media & Technology

Trusted advisors serving clients globally with diverse expertise and exceptional credentials – including accountants, economists, engineers, former CFOs and strategists

*Total shares outstanding multiplied by share price as of December 31, 2014
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.

www.fticonsulting.com