

A still life composition on a wooden surface. On the left is a translucent globe showing the continents. In the center is a US dollar bill, partially obscured by a green lime and purple flowers. The background is a warm, wooden texture.

COMPLIANCE

¿QUÉ?
¿PORQUÉ?
¿CÓMO?

Paolo Abad

Lima, Octubre de 2018

¿QUÉ?

- **Anti-corrupción**
 - De funcionarios de gobierno
 - Comercial
- **Derechos humanos:**
 - Fuerzas de seguridad privadas y públicas
 - Laborales (trabajo libre, no infantil, justa remuneración, no acoso, no discriminación, diversidad, sindicalización, salud y seguridad, etc.)
 - Trato justo (contratistas, comunidades, etc.)
 - Medio ambiente, salud y seguridad, *CSR*
- *AML/CTF*
- **Anti-fraude**
- Conflictos de intereses
- *Data privacy*
- *Insider Trading*
- *Conflict minerals*
- Sanciones y control de exportaciones
- Reportes a autoridades en estos asuntos (*SOX, Dodd Frank Act, ESTMA, etc.*)

¿PORQUÉ?

Baja del Valor de las Acciones por Problemas Reputacionales

UNC | 1 Ye | Wha | No s | Link | Con | Ode | FIN | Ethic | Rec | CRE | Mur | Diar | LAT | Ren | X | G | indi. | + | - | X

gestion.pe/empresas/grana-y-montero-cerro-s-220-caida-record-33-jornada-2183101

MERCADO DE VALORES | >BLBGPT 0.08 | DOW JONES +0.21 | NASDAQ +0.39 | S&P 500 +0.33 | SPBLPGPT 0.21 | SPBL25PT 0.45 | SPBLBGPT 0.08 | DOW JONES +0.21 | NASDAQ +0.39

GESTIÓN | EL DIARIO DE ECONOMÍA Y NEGOCIOS DE PERÚ | Domingo, 12 de marzo del 2017 | Contáctenos | **Suscríbete**

Portada | Economía | **Empresas** | Mercados | Tu Dinero | Inmobiliaria | Management | Política | Opinión | Tecnología | Tendencias | Blogs

ESTÁS EN > PORTADA > EMPRESAS >

Graña y Montero: acción cerró con caída récord de 33%

Viernes, 24 de febrero del 2017

EMPRESAS 18:02 | **Graña y Montero** fue afectada tras divulgarse que conocía de los sobornos pagados por Odebrecht en Perú. La empresa ha negado rotundamente esa declaración.



Foto: Gestión.

GESTIÓN TV

ÚLTIMA HORA
VER TODAS

- 16:00** | Casi S/ 21 millones costará rehabilitar infraestructura agrícola dañada por lluvias en Piura
- 16:32** | Nike lanza un Hiyab para deportistas musulmanas
- 16:47** | Alitalia se enfrenta al fantasma de una tercera bancarota
- 17:04** | Venezuela amenaza con expropiar panaderías para ganar "guerra del pan"
- 17:34** | Lima tiene la mejor gastronomía del mundo, según los números
- 05:05** | Alientan a brasileños a ser menos austeros y gastar su efectivo

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Anuncios de interés

- GRAN CACERÍA FINAL 2016 - CHEROKEE**
Tu próximo Cherokee está en la mira. Cázalo ahora con nuestros increíbles descuentos. Últimas unidades 2016. Cotiza AQUÍ <http://jeep.pe>
- Entrenamiento Espartano 360**
Prueba un sistema de entrenamiento funcional y militar con 33% dscto. solo por ser parte del Club El Comercio.

La jornada de hoy en la bolsa peruana estuvo marcada

Windows taskbar: 3:40 p. m. 12/03/2017

Altos Costos de Investigación, Defensa y Remediación

The image is a screenshot of a web browser displaying a news article from WWD (Women's Wear Daily). The browser's address bar shows the URL: <https://wwd.com/business-news/financial/wal-mart-costs-of-bribery-fcpa-probe-set-to-exce>. The WWD logo is prominent in the top left, with navigation links for 'SECTIONS', 'FASHION. BEAUTY. BUSINESS.', 'Subscribe', and 'Log In'. A search bar is located in the top right. Below the navigation is a yellow banner with the text 'Your Front Row Ticket to All the News and Scoops from Fashion Weeks: NEW YORK · LONDON · MILAN · PARIS' and a red 'SUBSCRIBE NOW' button. The article title is 'Wal-Mart Costs Related to Bribery Probe Set to Exceed \$1 Billion'. The byline reads 'By Kali Hays on November 17, 2017'. The main text begins with 'Wal-Mart Stores Inc. is getting close to putting a lengthy government investigation of its foreign operations behind it, but the financial cost has been steep.' Below the text are two buttons: 'SUBSCRIBE NOW' and 'LOG IN'. On the right side, there is an advertisement for 'ORIGINS WAKE UP & ENERGIZE SKIN' featuring a jar of cream and coffee beans. The Windows taskbar is visible at the bottom, showing various application icons and the system clock displaying '7:47 p. m. 3/10/2018'.

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BUSINESS / FINANCIAL

Wal-Mart Costs Related to Bribery Probe Set to Exceed \$1 Billion

The megaretailer is nearing a settlement with the government stemming from allegations that an international expansion went too smoothly.

By **Kali Hays** on November 17, 2017

Wal-Mart Stores Inc. is getting close to putting a lengthy government investigation of its foreign operations behind it, but the financial cost has been steep.

The retail giant said in its generally glowing third-quarter financial results that it's set aside

To continue reading this article...

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7:47 p. m. 3/10/2018

Demandas de Accionistas

The screenshot shows a web browser window displaying the Osler website. The browser's address bar shows the URL: [osler.com/en/resources/critical-situations/2015/avon-settles-fcpa-related-class-action-for-\\$62-mil](http://osler.com/en/resources/critical-situations/2015/avon-settles-fcpa-related-class-action-for-$62-mil). The website header includes navigation links: ALUMNI, ABOUT US, CONTACT US, EVENTS, CAREERS, FRANÇAIS, and a search bar. The Osler logo is prominently displayed. Below the logo is a navigation menu with links: TEAM, EXPERTISE, YOUR BUSINESS NEEDS, RESOURCES (highlighted in red), WHY OSLER, and STUDENTS. The breadcrumb trail reads: HOME / RESOURCES / CRITICAL SITUATIONS. The main article title is "Avon Settles FCPA Related Class Action for \$62 Million: Lessons for Canadian Companies on Undertaking Timely Investigations". The author is listed as Riyaz Dattu and Sonja Pavic, dated Sept 14, 2015. The article text begins with "Avon Products Inc. (Avon) and a group of its shareholders reached a \$62 million settlement last month in a derivative class action law suit alleging securities fraud. The plaintiffs claimed that Avon and its officers had concealed that the company had given bribes to Chinese government officials by various means, including gifting Gucci bags and improper travel expense payments. This settlement follows the December 2014 payment of a total of \$135 million in fines to both the U.S. Securities and Exchange Commission (SEC) and the Department of Justice (DOJ) for violating the Foreign Corrupt Practices Act (FCPA)." A sidebar on the right contains a "RESOURCE CATEGORY" list with links: All Resources, Critical Situations, Contracts & Transactions, Cross-Border Markets, Canadian Legislation & Regulations, and Corporate & Investor Governance. The Windows taskbar at the bottom shows the time as 5:00 p.m. on 18/11/2016.

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OSLER

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Avon Settles FCPA Related Class Action for \$62 Million: Lessons for Canadian Companies on Undertaking Timely Investigations

Author(s): [Riyaz Dattu](#), [Sonja Pavic](#)
Sept 14, 2015

Avon Products Inc. (Avon) and a group of its shareholders reached a \$62 million settlement last month in a derivative class action law suit alleging securities fraud. The plaintiffs claimed that Avon and its officers had concealed that the company had given bribes to Chinese government officials by various means, including gifting Gucci bags and improper travel expense payments. This settlement follows the December 2014 payment of a total of \$135 million in fines to both the U.S. Securities and Exchange Commission (SEC) and the Department of Justice (DOJ) for violating the *Foreign Corrupt Practices Act* (FCPA).

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- [Corporate & Investor Governance](#)

Background

Pérdida de Negocios

The screenshot shows a web browser window with the URL fcpablog.com/blog/2014/3/13/uk-oil-firm-declares-corruption-force-majeure-in-guinea-beca.html. The page features the Bureau Van Dijk logo and a navigation menu. The main content area displays the article title and author information. A sidebar on the left contains a search bar and a newsletter subscription form. A sidebar on the right promotes daily news and research services.

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« FLORIDA MAY SNUFF CROOKED BURG | MAIN | SWITZERLAND LAUNCHES PROBE OF UZBEK FIRST DAUGHTER »

UK oil firm declares 'corruption force majeure' in Guinea because of FCPA probe

By [Richard L. Cassin](#) | Thursday, March 13, 2014 at 3:18AM



Tullow Oil declared force majeure on its offshore exploration block in Guinea following the disclosure that its partner, U.S.-based Hyperdynamics Corporation, is under investigation by the DOJ and SEC for possible violations of the Foreign Corrupt Practices Act.

As reported Thursday **by Oil Patch Asia**, the U.S. investigation was launched after the West African country of Guinea sought help from the G8 countries to track potentially corrupt deals.

Image courtesy of Tullow Oil

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Due diligence and market entry research by the experts at **STROZ FRIEDBERG**

SEEK TRUTH

Fraud and corruption country profiles
Security and business incident feeds
Geopolitical risk analysis
Interactive mapping

Windows taskbar: 4:56 p. m. 18/11/2016

RYOHO TECH DE MEXICO S.A. DE C.V.	GABRIEL MACERA 516, DESPACHO 301, COLONIA DEL VALLE, DELEGACION BENITO JUAREZ, MEXICO, D.F. (03100)	Mexico	27-JUL-2016	08-JUN-2023	Cross-Debarment: IDB
ANDRES RODRIGUEZ DE LA TORRE	INSURGENTES SUR 1898, PISO 12, COLONIA FLORIDA, DELEGACION ALVARO OBREGON, CIUDAD DE MEXICO, D.F.	Mexico	09-JUL-2015	20-MAY-2022	Cross-debarment: IDB
JOVENES FUTUROS EMPRESARIOS POR MEXICO, A.C. (JEMAC)	INSURGENTE, S SUR 1898, PISO 12, COLONIA FLORIDA, DELEGACION ALVARO OBREGON, CIUDAD DE MEXICO, D.F.	Mexico	09-JUL-2015	20-MAY-2022	Cross-debarment: IDB
SNC-LAVALIN DE MEXICO, S.A. DE C.V.*150	MEXICO CITY	Mexico	17-APR-2013	17-APR-2023	Consult. Guidelines 1.22(a)(i)-(ii); Proc. Guidelines 1.15(a)(i)-(ii)
SNC-LAVALIN INGENIERIA Y CONSTRUCCION, S.A. DE C.V.	SAN FRANCISCO 1005 DEL VALLE BENITO JUAREZ DISTRITO FEDERAL 03100, MEXICO CITY	Mexico	17-APR-2013	17-APR-2023	Consult. Guidelines 1.22(a)(i)-(ii); Proc. Guidelines 1.15(a)(i)-(ii)
DE LORENZO OF AMERICA CORP., S.A. DE C.V.*107	PENSYLVANIA NO. 189 P.B., COL. NAPOLES, DEL. BENITO JUÁREZ, C.P. 03810 MEXICO, D.F.	Mexico	30-MAY-2012	Ongoing	Procurement Guidelines, 1.15(a)(ii)

Cross-debarred Entities

Cross-debarment applies to:

- (a) all projects subject to the May 2010 or later dated revisions to the Procurement Guidelines and Consultant Guidelines; and
- (b) to all projects subject to earlier editions of the Procurement Guidelines and Consultant Guidelines for which the legal agreements have been amended to give effect to the cross-debarment regime, with the exception of projects in the following countries for which such amendments have not taken effect:
 - (1) Federative Republic of Brazil (not including States and other financing recipients in Brazil);

Sanciones a Empresa por Gobiernos en los Países de Operación y en Otros Países (“Brazo Largo”)

PERÚ: Responsabilidad Autónoma de las Personas Jurídicas

Ley **30424** (publicada 21 Abril 2016) modificada por **D. Leg. N° 1352** (publicado 7 enero 2017)

- Vigente desde **1 Enero 2018**
- Corrupción de funcionarios de gobierno peruanos y extranjeros (entre otros delitos) cometida en su nombre o por cuenta de ellas y en su beneficio, directo o indirecto, por:
 - a. Socios, directores, administradores de hecho o derecho, representantes legales o apoderados de la persona jurídica, o de sus filiales o subsidiarias.
 - b. La persona natural que, estando sometida a la autoridad y control de las personas mencionadas en el literal anterior, haya cometido el delito bajo sus órdenes o autorización.
 - c. La persona natural señalada en el literal precedente, cuando la comisión del delito haya sido posible porque las personas mencionadas en el literal a. han incumplido sus deberes de supervisión, vigilancia y control sobre la actividad encomendada, en atención a la situación concreta del caso.
- Las personas jurídicas que tengan la calidad de matrices serán responsables y sancionadas siempre que las personas naturales de sus filiales o subsidiarias, que incurran en cualquiera de las conductas señaladas en el primer párrafo, hayan actuado bajo sus órdenes, autorización o con su consentimiento.

- **Sanciones:**

- Económicas
- Suspensión temporal de actividades
- Prohibición temporal o definitiva de determinadas actividades
- Inhabilitación definitiva para celebrar contratos con el Estado (“muerte civil”)
- Extinción de licencias, concesiones, derechos y otras autorizaciones administrativas o municipales
- Cierre temporal o definitivo del lugar de negocios de la persona jurídica
- Confiscación
- Intervención
- Disolución

- **Atenuantes de responsabilidad:**

- (i) Confesión bajo ciertas circunstancias;
- (ii) Cooperación con autoridades;
- (iii) Evitar daños resultantes del delito;
- (iv) Indemnización total o parcial del daño;
- (v) Implementación, después del delito, pero antes de cierto momento en el proceso judicial, de un “modelo de prevención” que tenga ciertas características (inclusive cumplimiento parcial de ese modelo de prevención).

- **Exoneración de responsabilidad:**

- (i) Implementación, antes del delito, de un “modelo de prevención”.
 - “Modelo de prevención” de acuerdo a la naturaleza, riesgos, necesidades y características de la persona jurídica – vigilancia y medidas de control para prevenir o disminuir significativamente el riesgo de ocurrencia del delito.
 - Ciertas características, como persona autónoma responsable de prevención, evaluación de riesgos y mitigación, sistemas de denuncias, difusión periódica de, entrenamiento sobre y auditoría del “modelo de prevención”.
 - Reglamento debe establecer contenido del “modelo de prevención”.
- (ii) Para fusiones y escisiones, entidad resultante será exonerada si apropiado due diligence antes de la reorganización.



Home » Office of Public Affairs » News

JUSTICE NEWS

Department of Justice Office of Public Affairs



FOR IMMEDIATE RELEASE

Monday, July 25, 2016

LATAM Airlines Group Resolves Foreign Corrupt Practices Act Investigation and Agrees to Pay \$12.75 Million Criminal Penalty

LATAM Airlines Group S.A. (LATAM), a commercial airline company based in Chile, has agreed to pay a \$12.75 million criminal penalty in connection with a scheme to pay bribes to Argentine union officials via a false consulting contract with a third-party intermediary in violation of the accounting provisions of the Foreign Corrupt Practices Act (FCPA).

Assistant Attorney General Leslie R. Caldwell of the Justice Department's Criminal Division and Special Agent in Charge George L. Piro of the FBI's Miami Field Office made the announcement.

According to admissions made in the resolution documents, executives at LATAM's predecessor-in-interest, LAN Airlines S.A. (LAN), executed a fictitious \$1.15 million consulting agreement with an advisor to the Secretary of Argentina's Ministry of Transportation in October 2006. Although the agreement purportedly required the consultant to undertake a study of Argentine airline routes, the consultant never provided any such services. Instead, the purported consultant funneled the monies he received pursuant to the contract to Argentine labor union officials in exchange for the union agreeing to accept lower wages and to not enforce what would have been a costly labor rule. In total, LAN profited by more than \$6.7 million as a result of the bribes paid to the union officials.

LATAM entered into a three-year deferred prosecution agreement (DPA) to resolve the case. As part of the DPA, LATAM agreed to pay a \$12.75 million criminal penalty, continue to cooperate with the department's investigation, enhance its

DEPARTMENT OF JUSTICE ACTION CENTER. Report a Crime, Get a Job, Locate a Prison, Inmate, or Sex Offender, Apply for a Grant, Submit a Complaint, Report Waste, Fraud, Abuse or Misconduct to the Inspector General, Find Sales of Seized Property, Find Help and Information for Crime Victims, Register, Apply for Permits, or Request Records, Identify Our Most Wanted Fugitives, Find a Form.

Alcoa y una de sus subsidiarias pagaron **US\$384 millones (2014)**

The screenshot shows a Bloomberg news article. At the top, there is a navigation bar with the Bloomberg logo and various menu items like Markets, Tech, Pursuits, Politics, Opinion, and Businessweek. The main headline reads "Alcoa Pays \$384 Million to Resolve Bahrain-Bribery Probe". Below the headline, the author is listed as Alan Katz and the date as 9 de enero de 2014 9:01 p. m. PST. The article text states: "Alcoa Inc., the largest U.S. aluminum producer, agreed to pay \$384 million to resolve U.S. criminal and civil probes, after a unit admitted paying tens of millions of dollars in bribes to members of Bahrain's royal family and officials at a state-owned company to win business." A sidebar on the right features a large number "18" and the text "Our senior leveraged finance analysts have an average". The bottom of the image shows a Windows taskbar with various application icons and a system tray displaying the time as 3:21 p. m. on 12/03/2017.

Gold Fields Limited anunció que recibió una comunicación de *SEC* indicando que no se iniciaría proceso en su contra **(2015)**

The screenshot shows a web browser displaying a news article on the mining.com website. The article title is "US regulator drops probe on Gold Fields' South Deep BEE deal" by Cecilia Jansamie, dated June 22, 2015. The article features a video player with a photo of Gold Fields chief executive officer Nick Holland. To the right of the article is a sidebar with a "Quickly Measure Stockpile Volumes" advertisement for LAYER TECHNOLOGY, a gold and silver price table, and another advertisement for "Ideal for industrial minerals". The browser's address bar shows the URL "mining.com/us-regulator-drops-probe-on-gold-fields-south-deep-bee-deal". The Windows taskbar at the bottom indicates the date is 12/03/2017 and the time is 3:27 p.m.

mining.com/us-regulator-drops-probe-on-gold-fields-south-deep-bee-deal

MINING.com HOME GOLD COAL COPPER IRON ORE MORE MARKET DATA infoMine Sign In Join

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US regulator drops probe on Gold Fields' South Deep BEE deal

Cecilia Jansamie | Jun. 22, 2015, 6:25 AM | 792 | 0

PEOPLEMAG FACEBOOK LINKEDIN TWITTER EMAIL PRINT

Gold Fields chief executive officer Nick Holland. (Screenshot via YouTube)

South African miner Gold Fields (NYSE:GFI) (JSE:GFI) said Monday the foreign anti-corruption unit of U.S. Securities and Exchange Commission (SEC) has decided not to take any further action

Quickly Measure Stockpile Volumes LAYER TECHNOLOGY

Gold \$1,204.55 0.31% Silver \$17.00 0.47% More in markets

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Ideal for industrial minerals Technologically advanced

3:27 p.m. 12/03/2017

BHP Billiton aceptó pagar **US\$25 millones** y reporter a *SEC* la implementación de su programa anti-corrupción por 1 año **(2015)**

The screenshot shows a web browser displaying a Wall Street Journal article. The browser's address bar shows the URL: www.wsj.com/articles/sec-charges-bhp-with-violating-fcpa-at-2008-summer-olympics-1432127870. The page header includes the Wall Street Journal logo, a subscription offer for \$12 for 12 weeks, and a navigation menu with categories like Home, World, U.S., Politics, Economy, Business, Tech, Markets, Opinion, Arts, Life, and Real Estate. Below the navigation menu, there are several article teasers with images and headlines, such as 'Uber Urges Drivers to Reject Unionization Effort in Seattle', 'After Strong Opening, 'Kong' Will Need Momentum', and 'Tesla's Musk Sets Sights on Australia—Via Twitter'. The main article is titled 'SEC Fines BHP \$25 Million After Gifts Probe' and is categorized under 'BUSINESS'. The author is Scott Patterson, and the article was updated on May 20, 2015, at 2:00 p.m. ET. The article text states: 'The U.S. Securities and Exchange Commission slapped Australian mining company BHP Billiton with a \$25 million fine for practices tied to gifts offered to foreign government officials during the 2008 Summer Olympic Games in Beijing. BHP agreed to pay the fine to settle the charges, the SEC said.' A sidebar on the right features a 'BARRON'S' logo and the text 'WILL THE BULL MARKET REIGN?'. The Windows taskbar at the bottom shows the date and time as 3:17 p.m. on 12/03/2017.

Rio Tinto y su Proyecto Simandou en Guinea (2016)

The screenshot shows a web browser window with the URL `riotinto.com/documents/161109_Rio_Tinto_contacts_regulatory_authorities.pdf?_ga=1.250986831.830591251.1470111298`. The page content includes the Rio Tinto logo and the title "Media release". The main heading is "Rio Tinto contacts regulatory authorities" dated "9 November 2016". The text describes an investigation into contractual payments from 2011 and the suspension of executives Alan Davies and Debra Valentine. It concludes with a statement of cooperation with regulatory authorities.

RioTinto Media release

Rio Tinto contacts regulatory authorities

9 November 2016

On 29 August 2016, Rio Tinto became aware of email correspondence from 2011 relating to contractual payments totalling US\$10.5 million made to a consultant providing advisory services on the Simandou project in Guinea.

The company launched an investigation into the matter led by external counsel. Based on the investigation to date, Rio Tinto has today notified the relevant authorities in the United Kingdom and United States and is in the process of contacting the Australian authorities.

Energy & Minerals chief executive Alan Davies, who had accountability for the Simandou project in 2011, has been suspended with immediate effect.

Legal & Regulatory Affairs group executive Debra Valentine, having previously notified the company of her intention to retire on 1 May 2017, has stepped down from her role.

Rio Tinto intends to co-operate fully with any subsequent inquiries from all of the relevant authorities. Further comment at this time is therefore not appropriate.

- **Newmont** anunció una investigación interna por sospechas de transgresiones de *FCPA* fuera de *USA* (2015)
- Newmont informó que estaba tomando medidas para prevenir corrupción: gerentes de ética y cumplimiento, entrenamiento, y auditorías externas de sus políticas y procedimientos anti-corrupción (2016)
- *SEC* y *DOJ* informaron que no procesarían a Newmont. Newmont no ha comentado si las transgresiones ocurrieron sino sólo que el asunto involucró a contratistas extranjeros (2017)

The screenshot shows a web browser window with the address bar displaying 'mining.com/newmont-mining-faces-bribery-allegations'. The page content includes:

- Navigation Bar:** MINING.com, HOME, GOLD, COPPER, IRON ORE, MORE, MARKET DATA, InfoMine, Sign In, Join.
- Header:** Efficient Elution Strip Heating, Nordberg GP7 is an ideal replacement for any 7ft crusher, Water is an investment: as valuable as ounces in the ground, Sign Up for the Latin America Digest.
- Advertisement:** LSC LITHIUM CORPORATION - AN EMERGING LITHIUM PRODUCER. FAST TRACKING LITHIUM PROJECTS TO PRODUCTION IN ARGENTINA.
- Article Title:** Newmont Mining investigating bribery allegations. Cecilia Jamsmie | Apr. 21, 2016, 5:39 AM | 3,381 | 1.
- Article Image:** A large photograph of a mining site with a truck in the foreground and mountains in the background.
- Article Text:**

Newmont has been panning gold in Nevada for about 50 years in the northern part of the state. (Image courtesy of Newmont Mining)

Newmont Mining Corp's (NYSE:NEM), the world's 2nd largest gold miner, is reviewing its compliance with US foreign bribery law.

Reporting its first-quarter earnings, the Colorado-based company said it had engaged outside counsel as part of a review of its compliance with the Foreign Corrupt Practices Act, which bars the use of bribes to foreign officials.
- Market Data Sidebar:**

Gold	\$1,204.55	0.31%
Silver	\$17.03	0.47%

More in markets

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- Advertisement:** TruPulse® 200X + MapSmart with Volume. LASER TECHNOLOGY. Ideal for industrial minerals. Technologically advanced equipment from Joy. Download the brochure.
- Taskbar:** Windows taskbar showing various application icons and system tray information: 3:30 p. m., 12/03/2017.

- **Kinross** acuerda con SEC por casi 1 millón US\$
- Acusación de que Kinross no adoptó suficientes controles internos en países de Africa (ej: US\$ 1000 pagados a un tramitador para ayudar a obtener visa de trabajo para un trabajador de Kinross) **(Marzo 2018)**

The screenshot shows a web browser displaying a Reuters article. The browser's address bar shows the URL: reuters.com/article/us-kinross-sec/kinross-gold-settles-u-s-charges-related-to-bribe-prevention-in-africa-idUSKBN1H22DW. The page header includes the Reuters logo and navigation links for World, Business, Markets, Politics, and TV. Below the header are several topic tags: Myanmar, Energy & Environment, Brexit, North Korea, Charged: The Future of Autos, Future of Money, and Breakingviews. The main content area features the article title "Kinross Gold settles U.S. charges related to bribe prevention in Africa" by Joel Schectman, dated March 26, 2018, at 5:17 PM, 23 days ago. The article text states: "WASHINGTON (Reuters) - The U.S. Securities and Exchange Commission said Canadian-based mining company Kinross Gold Corp agreed to pay \$950,000 to settle civil charges that it failed to ensure its payments in Africa were not being used to bribe government officials." To the right of the article is a sidebar with three MarketViews items: "10 Worst performing ETFs of 2017", "Where is the clever money going?", and "Central Bankers Face a Crisis of Confidence as Models Fail". At the bottom of the page, there is a video player showing the Kinross logo. The Windows taskbar at the bottom indicates the time is 3:01 p.m. on 18/04/2018.

fcpa.stanford.edu/statistics-top-ten.html

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Charts & Graphics Heat Maps **Top Ten** Key Statistics Facts Boxes

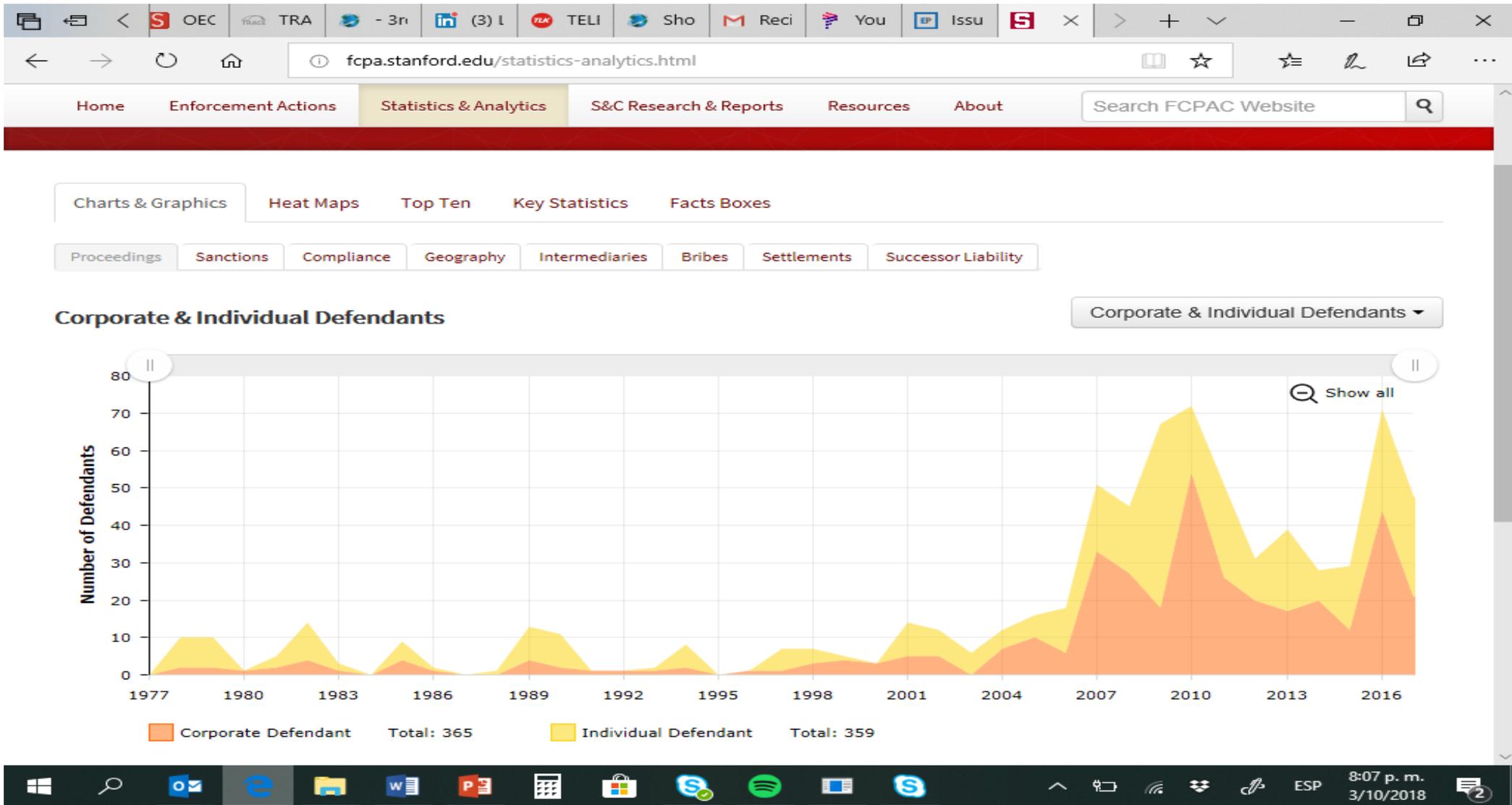
Top Ten by Largest Monetary Sanction Largest Monetary Sanction

In the Matter of Petroleo Brasileiro S.A. - Petrobras	\$ 1,018,793,797
United States of America v. Alstom S.A.	\$ 772,290,800
United States of America v. Societe Generale S.A.	\$ 567,776,444
United States of America v. Siemens Aktiengesellschaft	\$ 448,500,800
United States of America v. Kellogg Brown & Root LLC	\$ 402,002,000
United States of America v. BAE Systems PLC	\$ 400,000,400
Securities and Exchange Commission v. Siemens Aktiengesellschaft	\$ 350,000,000
United States of America v. Teva Pharmaceutical Industries Ltd.	\$ 283,177,348
United States of America v. Telia Company AB, et al.	\$ 274,604,372
United States of America v. Total, S.A.	\$ 245,200,000

About Largest Monetary Sanctions

7:57 p. m. 3/10/2018

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WORLD NEWS OCTOBER 24, 2017 / 5:23 PM / 9 MONTHS AGO

Peruvians take Glencore to court over police abuse allegations

Reuters Staff

2 MIN READ



(Reuters) - Peruvian villagers suing miner Glencore will argue in London's High Court next week that the company should be held liable over their allegations they were abused by Peruvian police,

FINANCIAL POST

Canadian multinationals can be sued for alleged human rights abuses committed abroad: B.C. court

Canadian multinationals are going to have a tough time keeping foreigners from suing them in Canada for alleged human rights violations committed abroad



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BUSINESS

LAN Airlines CEO Ignacio Cueto in Settlement With SEC

U.S. watchdog issues cease-and-desist order after company' failed to accurately record payment to consultant

By **RYAN DUBE**

Updated Feb. 4, 2016 9:58 p.m. ET

Chilean-based Latam Airlines Group SA on Thursday said an executive at one of its units consented to a cease-and-desist order from the U.S. Securities and Exchange Commission over the company's failure to properly record a payment to a consultant 10 years ago.

LAN Airlines CEO Ignacio Cueto also agreed to pay a \$75,000 penalty to the regulator, the company said in a brief statement. Mr. Cueto wasn't available for comment.

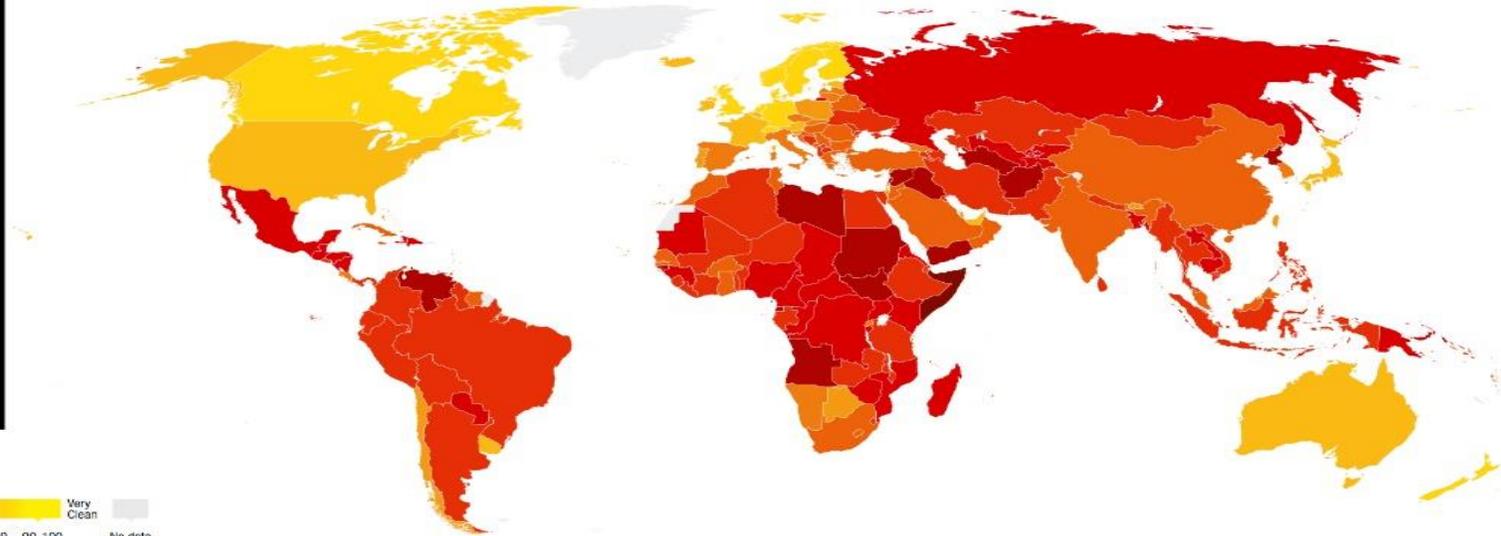
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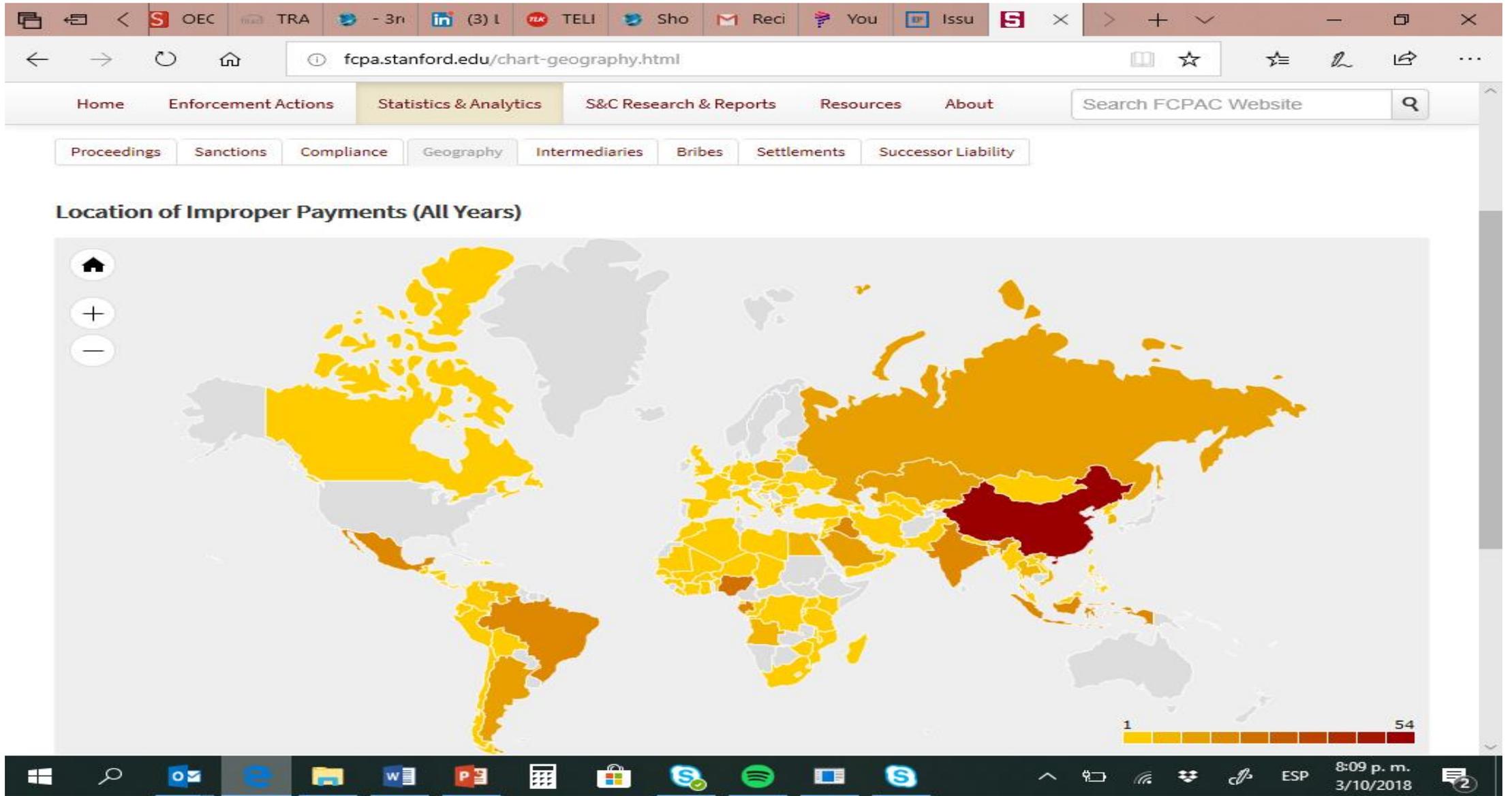
- Reducir riesgos **para la empresa**:
 - Baja en valor de la empresa por problemas de reputación
 - **Revocación, suspensión y cancelación de permisos**
 - Altos costos de investigación, defensa y remediación
 - Demandas de accionistas
 - Pérdida de negocios
 - **Demandas de *whistleblowers***
 - **No estar en condiciones de cubrir la creciente necesidad de mostrar esfuerzos de *compliance* ante *stakeholders* (ejm: accionistas, gobiernos, acreedores, socios, compañías de seguros, proveedores y comunidades)**
 - **Ambiente laboral**
 - **“Más estoy dispuesto a dar, más me piden”**
 - **Costos por sanciones comerciales (incumplimientos contractuales de PAS; etc.)**
 - Costos por sanciones de autoridades del gobierno del país de operación, de otros países (brazo largo apoyado por nuestros países) y de organismos multilaterales
- Reducir riesgos **para nuestros ejecutivos y trabajadores**:
 - **Reputacional**
 - Sanciones de autoridades del gobierno del país de operación y de otros países (brazo largo apoyado por nuestros países) , costos de transacciones y de multas; y cárcel
 - **Altos costos de defensa**
 - **Responsabilidad del Directorio y de ejecutivos, aun por problemas en afiliadas**

CORRUPTION PERCEPTIONS INDEX 2017

The perceived levels of public sector corruption in 180 countries/territories around the world.



RANK	COUNTRY/TERRITORY	SCORE	RANK	COUNTRY/TERRITORY	SCORE	RANK	COUNTRY/TERRITORY	SCORE	RANK	COUNTRY/TERRITORY	SCORE	RANK	COUNTRY/TERRITORY	SCORE	RANK	COUNTRY/TERRITORY	SCORE
1	New Zealand	89	21	Estonia	71	39	Romania	48	96	Thailand	37	135	Russia	29	161	Congo	21
2	Denmark	88	21	United Arab Emirates	71	62	Cuba	47	96	Zambia	37	143	Bangladesh	28	161	Congo	21
3	Finland	85	23	France	70	62	Malaysia	47	103	Bahrain	36	143	Guatemala	28	161	Democratic Republic of Congo	21
3	Norway	85	23	Uruguay	70	64	Montenegro	46	103	Côte D'Ivoire	36	122	Kazakhstan	31	143	Kenya	28
3	Switzerland	85	25	Barbados	68	42	Czech Republic	57	103	Mongolia	36	122	Liberia	31	143	Lebanon	28
6	Singapore	84	26	Bhutan	67	42	Dominica	57	103	Tanzania	36	122	Malawi	31	143	Mauritania	28
6	Sweden	84	26	Chile	67	66	Spain	57	107	Armenia	35	122	Mali	31	148	Comoros	27
8	Canada	82	28	Behamas	65	66	Georgia	56	107	Ethiopia	35	122	Nepal	31	148	Guinea	27
8	Luxembourg	82	29	Portugal	63	68	Belarus	56	107	Macedonia	35	122	Moldova	31	148	Nigeria	27
8	Netherlands	82	29	Qatar	63	68	Cabo Verde	55	107	Vietnam	35	130	Gambia	30	151	Nicaragua	26
8	United Kingdom	82	29	Taiwan	63	68	Rwanda	55	107	Philippines	34	130	Iran	30	151	Uganda	26
12	Germany	81	32	Brunei Darussalam	62	71	Saint Lucia	55	111	Algeria	33	130	Myanmar	30	153	Cameroon	25
13	Australia	77	32	Israel	62	71	Korea (South)	54	91	Albania	38	112	Sierra Leone	30	153	Mozambique	25
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			40	Latvia	58	59	Trinidad and Tobago	41	96	Peru	37	135	Paraguay	29			
			59	Jordan	48	59			96								



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Y
TENER, SI ALGO MALO OCURRE, LA MEJOR DEFENSA POSIBLE**