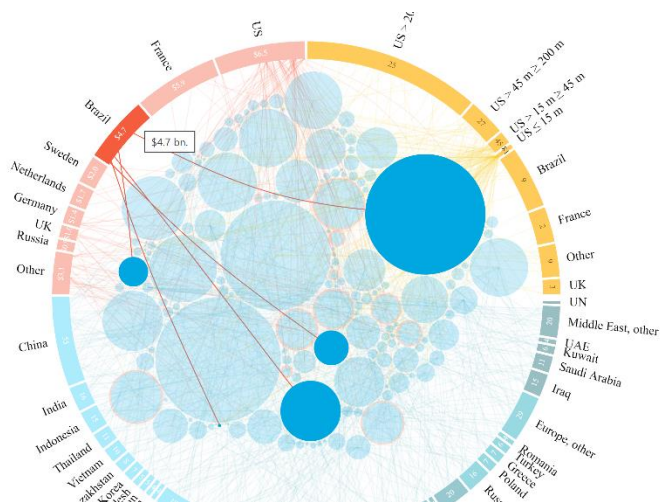


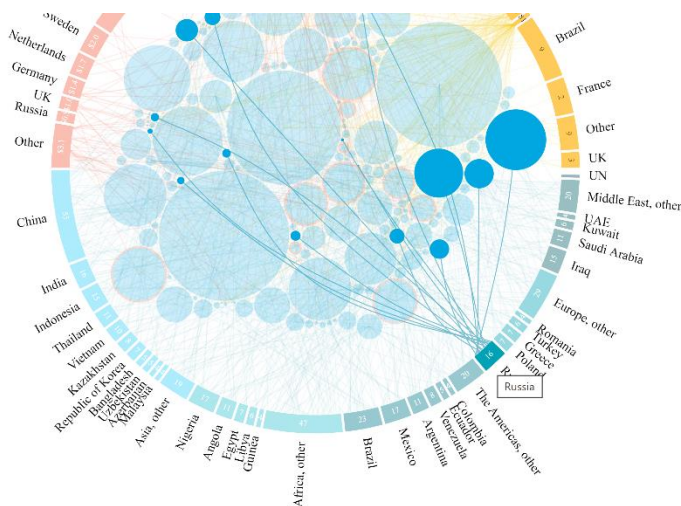
FCPA Infographic Guide

The infographics are based on the analysis of the information about cases of liability of legal persons for the violation of the U.S. Foreign Corrupt Practices Act (FCPA).

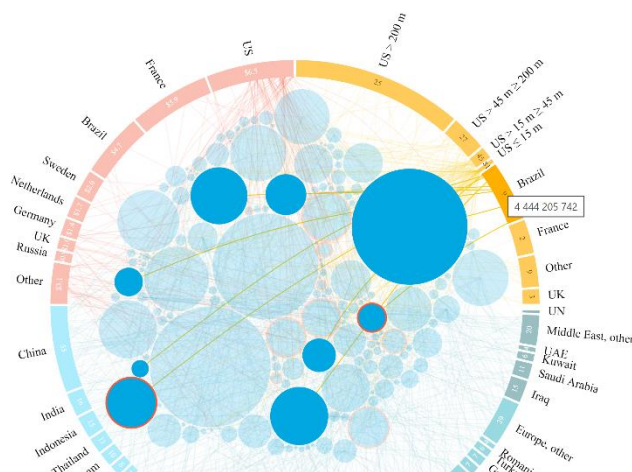
The three arcs of the big circle illustrate the distribution of companies by country: 1) where the headquarters of the company were based at the time sanctions were imposed (orange),



2) officials that were bribed (blue),

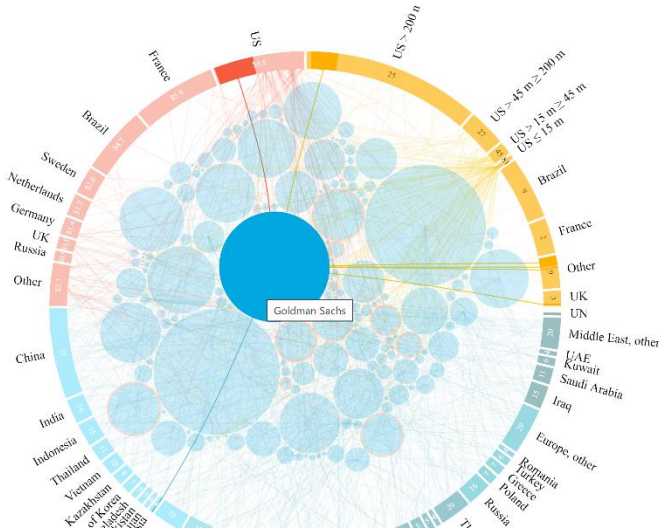


3) the countries whose budgets received financial sanctions (yellow).



The figures in the arcs indicate the number of relevant cases; the overall payments (orange and yellow arcs) and the list of countries (blue arc) are indicated by pointing the mouse to the respective arc.

Each “circle” inside the arcs represents a separate company (group of companies) which was held liable; the size of each circle is directly proportional to the amount of financial sanctions that were paid. The scale of display of the circles can be modified: to this end it is necessary to point to the inner circle and scroll the page (using the mouse wheel or the touchpad).



Below you can find a time scale - the year of bringing companies to justice. To select several years at the same time you need to press the Ctrl key.

Year: 2008 2009 2010 2011 2012 2013 2014
 2015 2016 2017 2018 2019 2020 **All**

The circles are entitled in accordance with the parent company’s name (even if it was only its subsidiary that was held liable). If a company has been prosecuted more than once, the circle is outlined in **orange**; if the company has bribed officials from the same country where its head office is registered, the circle is outlined in **dark blue**.

A click on a circle will open the information card of the case (cases) of the respective company.

The Goldman Sachs Group Inc.

Year: 2020

Headquarters: US

Industry: Financials

Related parties: Goldman Sachs & Co. LLC, Goldman Sachs (Malaysia) Sdn. Bhd., Goldman Sachs (Singapore) Pte. Ltd., Goldman Sachs (Asia) L.L.C., Goldman Sachs Bank USA, Tim Letiche, Jho Low, Roger Ng, Najib Razak

"Bribe-taker": Malaysia

Types of Bribes: Charitable Donations Entertainment Funding tutorial Gifts Goods/Services Improper Employment Meals Money Political Contribution Sponsorships Travel

Violations:

The Goldman Sachs Group Inc.

DOJ ● Anti-Bribery

SEC ● Anti-Bribery ● Books & Records ● Internal Controls

Goldman Sachs (Malaysia) Sdn. Bhd.

DOJ ● Anti-Bribery

< Back

< Basic information

< Industry

< "Bribe-taker"

< Bribery

< FCPA provision


< Self-Report

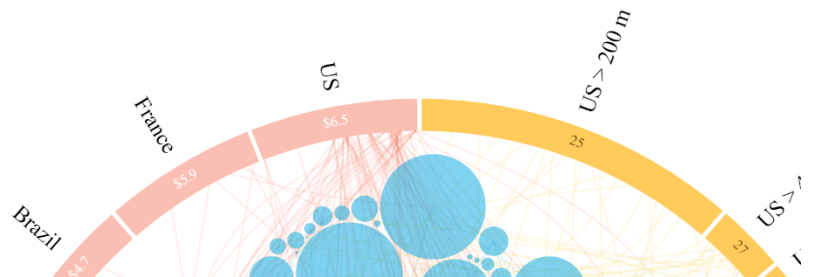
< Types of Resolution

< Total sanction

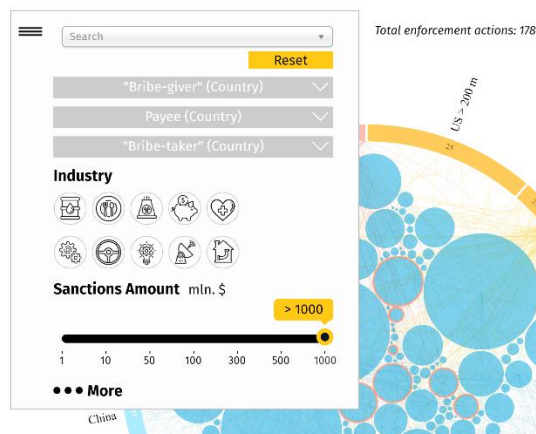
< Documents

The infographics also allow users to search for a company by different parameters: to this end it is necessary to open the legend in the top left corner (next to the total number of cases).

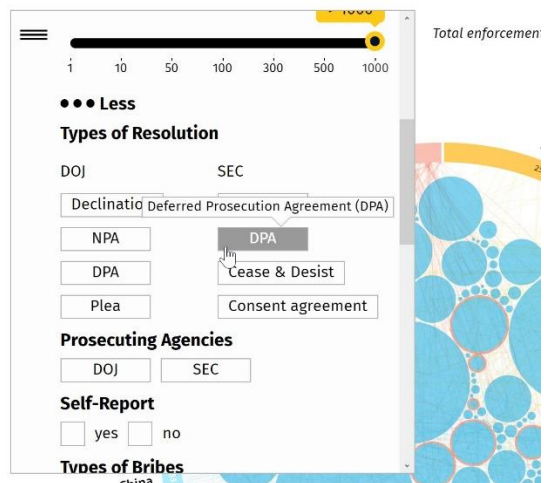
 Total enforcement actions: 178 Total sanctions: \$ 27 179 286 257



For those search criteria that provide a multiple choice, all results are displayed (i.e. if the item “Who was bribed” in Russia’s and China’s sections is selected, the cases of bribery of officials separately in Russia and China and, if present, in the two countries simultaneously will be displayed).



Pointing the mouse to the short titles in the search bar (for instance, to the “DPA” button in the section “Types of Resolution”) as well as to the icons indicating sectors and forms of bribery, it is possible to see their meaning in a pop-up window.



The search can be also conducted by selecting sectors on the arcs; in order to choose several sectors it is necessary to press the Ctrl key.

