

## Anti-Corruption Law's Third-Party Perils

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Most companies with an international footprint are already well-versed in the dangers and compliance challenges presented by the Foreign Corrupt Practices Act. More than a decade of aggressive U.S. enforcement and massive fines are hard to miss.

But despite the attention that compliance departments have placed on anti-corruption and foreign bribery prevention, a nettlesome issue persists: How far must a company go to police third parties with whom the company conducts business? Around the globe, companies continue to wrestle with questions about what due diligence is required with respect to transnational joint venture partners, targets for acquisition, distributors, vendors, and other third parties.

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