

ANTI-BRIBERY AND CORRUPTION POLICIES AND PROCEDURES

INITIAL REQUEST

Concilium Network member [Fieldfisher LLP](#) was instructed to undertake a review of anti-bribery and anti-corruption (ABAC) policies and procedures on behalf of an international chemical company, whose operations are spread across Asia, the United States of America, and Europe. The principal owner of the client company was a state-owned company in the Middle East.

FIELDFISHER REACHES OUT TO THE CONCILIUM NETWORK FOR ASSISTANCE

Given the company structure and beneficial ownership, Fieldfisher was asked to consider whether the client's employees in India, the U.S., the UK, and Germany would be considered government officials under local ABAC legislation. To ensure a reliable response, Fieldfisher sought the assistance of Concilium Network members [Foley & Lardner LLP](#) (U.S.) and [Panag & Babu](#) (India) to advise on:

- Whether local employees would qualify as government officials under local ABAC laws; and
- If so, what ABAC policies and procedures were needed to be implemented, particularly in relation to the receipt of gifts, meals, or entertainment by the employees.

OPTIMIZING EXPERTISE

With the assistance of Fieldfisher, Foley, and Panag & Babu, the client was able to understand the relevant ABAC laws, and they were able to update and amend their policies and procedures accordingly.

BEST RESULTS

Thanks to the assistance of the Concilium Network, the client received cost-efficient legal advice, which helped to ensure they were fully compliant with all relevant ABAC laws.



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