

Home Page Chart Descriptions

1. Location of Improper Payments: This chart identifies the countries where bribes were offered or paid, based on allegations in Enforcement Actions initiated within the last ten years. Data is culled from Enforcement Actions within FCPA Matters to avoid double counting that could otherwise occur when, for example, the same or affiliated defendants are sued in different Enforcement Actions for the same underlying bribery scheme. A country will be counted only once per FCPA Matter regardless of the number of bribes allegedly offered or paid to officials in that country. If a single FCPA Matter implicates more than one country, that Matter will be counted once for each unique country implicated. The data used to generate this graphic were culled from publicly available documents filed in connection with the Enforcement Actions and may not reflect all countries where bribes were offered or paid. See About Us - Datasets for definitions of "Enforcement Action" and "FCPA Matter."

2. Entity Groups and Individuals Sued per Year: This chart identifies the number of Entity Groups and individuals sued per year for each of the last ten years. There are many ways to count FCPA proceedings. For purposes of this graphic, multiple proceedings brought by the same agency in the same year against the same or affiliated entity defendants based on the same underlying bribery scheme are lumped together and counted as a single proceeding. Each unique individual defendant that is sued in a single year is counted separately. While the Clearinghouse does include proceedings that allege no FCPA-related allegations, for purposes of this graphic those cases are excluded from the count unless they are identified as FCPA-related cases on the SEC or DOJ website. Cases are deemed filed in the year that the charging document is filed. If no charging document is filed, the case is deemed filed in the year of the earliest press release, negotiated resolution, or other pertinent case filing. Note that this graphic relies on a unique methodology for counting FCPA proceedings that does not align with the definition of an "Enforcement Action" on the About Us – Datasets portion of this website. See About Us - Datasets for the definition of "Entity Groups."

3. Foreign and Domestic Entity Groups Charged per Year: Foreign and Domestic Entity Groups per Year (FCPA-Related): This chart identifies the number of Entity Groups the SEC or DOJ charged per year with FCPA-related violations, for each year since the statute's enactment. Entity Groups are aggregated annually according to the earliest initiation date of any Enforcement Action filed against the Entity Group within a single FCPA Matter. An Entity Group that is sued multiple times in multiple different years as part of separate FCPA Matters will be counted once per initiation year. The Entity Group is assigned to either "foreign" or "domestic" based on the attributes of the parent entity. If the parent is headquartered or incorporated in the United States, the Entity Group is deemed to be "domestic." If the parent is both headquartered and incorporated outside of the United States, the Entity Group is deemed to be "foreign." See About Us - Datasets for the definitions of "Enforcement Action" and "FCPA Matter." See About Us – Definitions for the definition of "Entity Group."

4. Corporate Sanctions per Year: This chart identifies the total, average and median monetary sanctions imposed on Entity Groups each year for the last ten years based on FCPA-related violations. Sanctions are aggregated by Entity Group and then by FCPA Matter. Sanctions may include amounts paid to foreign regulators in a global settlement if they were imposed and credited by U.S. regulators. Where it is possible to isolate sanctions, only sanctions attributable to FCPA-related misconduct are included in the total (and sanctions attributable to unrelated misconduct (e.g. Libor fraud) are excluded). Sanctions are adjusted to avoid double

counting that could otherwise occur when, for example, sanctions are imposed jointly and severally on multiple defendants or a single sanction imposed on a parent entity is deemed to resolve claims against multiple different subsidiaries in multiple different Enforcement Actions. Sanctions are aggregated annually by filing date. A \$0 value for a particular year could mean that no sanctions were imposed or, alternatively, that no FCPA-related Enforcement Actions were filed that year. See About Us – Datasets for definitions of “Enforcement Action” and “Entity Group.”

5. Average Sanctions for Corporations that Voluntarily Disclose and Don’t Voluntarily Disclose: This chart compares the average monetary sanction imposed on Entity Groups that voluntarily disclosed FCPA-related violations (or purported violations) to the SEC, DOJ or both with the average monetary sanction imposed on Entity Groups that did not voluntarily disclose FCPA-related violations (or purported violations). Sanctions are aggregated by Entity Group and then by FCPA Matter. Sanctions may include amounts paid to foreign regulators in a global settlement if they were imposed and credited by U.S. regulators. Where it is possible to isolate sanctions, only sanctions attributable to FCPA-related misconduct are included in the total (and sanctions attributable to unrelated misconduct (e.g. Libor fraud) are excluded). Sanctions are culled from Entity Groups sued or prosecuted within the past ten years and are adjusted to avoid double counting that could otherwise occur when, for example, sanctions are imposed jointly and severally on multiple defendants or a single sanction imposed on a parent entity is deemed to resolve claims against multiple different subsidiaries in multiple different Enforcement Actions. Data about voluntary disclosure is based on information that is disclosed in publicly available documents filed in connection with the Enforcement Actions, and may not reflect all instances of voluntary disclosure by companies. See About Us – Datasets for definitions of “Enforcement Action” and “Entity Group.”

6. Investigation Length by Resolution Type and Agency: These charts identify the average length of all SEC and DOJ Investigations initiated since the FCPA’s enactment. Ongoing Investigations and Investigations that are not disclosed in advance of resolution (and for which investigation length is unknown) are excluded from the analysis. Enforcement Actions with no corresponding Investigation record in the Clearinghouse database are also excluded from the analysis because we do not know the Investigation initiation date. Initiation and end dates are estimated based on information that is publicly disclosed in SEC filings, press releases and company reports, and may not reflect the actual initiation or end dates of government or internal investigations. See About US – Datasets for definitions of “Investigation” and “Enforcement Action.” See About Us – Definitions for the definition of “Estimated Length of Investigation.”