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REPORT

Rapporteur: Prof. Paulo Doron Rehder de Araujo

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INTERNATIONAL ANTI-CORRUPTION ACADEMY (IACA) - LUXEMBURG, AUSTRIA

LSGL ANTI-CORRUPTION WORKGROUP ANNUAL MIDTERM MEETING 2017

A report from the *IACA – LSGL's Compliance and Anti-Corruption Research Group Roundtable on Current Trends and Development in Anti-Corruption and Compliance*[*]

February 27th, 2017 - International Anti-Corruption Academy (IACA) - Laxenburg, Austria

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List of attendees to the meeting

Prof. Michael Nietsch (Germany)
Prof. Eduard Ivanov (Russia)
Prof. Serena Quattrocolo (Italy)
Prof. Emek Toraman Colgar (Turkey)
Prof. Juliete S. Sorensen (USA)
Prof. Abhishek Bharti (India)
Prof. Yoojin Choi (South Korea)
Prof. Danilo B. dos Santos Gomes de Araujo (Brazil)
Prof. Davi de Paiva Costa Tangerino (Brazil)
Prof. Maria Lúcia L. M. Pádua Lima (Brazil)
Prof. Paulo C. Goldschmidt (Brazil)
Prof. Paulo Doron Rehder de Araujo (Brazil)
Prof. Wanderley Fernandes (Brazil)

[*] This report is based on notes taken by the author while attending to the meeting and also on executive summaries, personal notes and PowerPoint presentations kindly provided by the Speakers. The author thanks each one of the Speakers for sharing this valuable material, without the ones it would be impossible to write this report.

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Welcome and Opening Addresses

Welcoming speakers and participants, Prof. EDUARD IVANOV (IACA) thanks the participants and LSGL Anti-Corruption Group for being present and highlights IACA's activities on scholar and training activities. He points out that IACA's academic and training initiatives are benchmark for compliance programs around the world, helping nations, governments, public and private organizations to fight corruption. IACA also offers technical support to Governments and Estates on anti-corruption matters. Finishing his welcome speech, Prof. IVANOV remarked that IACA is open for partnerships and cooperation with LSGL and its Law School members.

Prof. YOOJIN CHOI (IACA) addressed the IACA Summer Academies. Held every July, they offer a program designed to consolidate experiences and enlarge competences of professionals looking for improvement in counter-corruption-skills. The last one had participants from sixty different countries, including personal from public and private sector, media, and faculty members. She also remarked the tailor made training programs provided by IACA, successfully developed in China, Saudi Arabia, India and other places around the Globe.

In the **opening speech**, Prof. MICHAEL NIETSCH (EBS Law School) thanked Prof. IVANOV and other IACA personal for hosting the meeting. He also emphasized that LSGL Compliance and Anti-Corruption Research Group is open and willing to develop joint activities with IACA. Prof. NIETSCH also stated that corruption is one of the oldest problems of humankind. He then remarked the importance of the matter and welcomed the different institutions and scholars present at the meeting wanting to exchange experiences, to offer their domestic points of view and solutions in order to enrich the discussions and to help developing the anti-corruption legal frames and soft law instruments domestically and internationally.

Session 1: *The Petrobras Case – Presentation*

Panel presented by Professors MARIA LÚCIA L. M. PÁDUA LIMA, PAULO C. GOLDSCHMIDT, DANILO DE ARAUJO e WANDERLEY FERNANDES, all from DIREITO GV SP, São Paulo Law School of Fundação Getúlio Vargas, Brazil.

Prof. GOLDSCHMIDT opened the presentation thanking IACA and LSGL for the opportunity of speaking about one of the largest corruption cases in recent history. He gave a brief overview of PETROBRAS, the Brazilian state owned Oil Company, one of the largest corporations in the country, which was the epicenter of the corruption scandal that became known as Car Wash Operation.

Although the company has the Brazilian government as its main and controlling shareholder, millions of Brazilians and foreign investors have invested their savings in buying its stocks. As a listed company in the stock market (both in Brazil and abroad), the number of its minority shareholders reach impressive figures. The 2015 PETROBRAS annual report showed as 725,000 the number of shareholders in the company. It also has around 70,000 direct employees (not considering the 230,000 persons hired as independent subcontractors). In addition, the company owns 16 refineries (3 outside Brazil), has a fleet of 181 ships, more than 8,000 gas stations in Brazil and around 400 abroad. The company has also 7,500 kilometers of oil ducts and 7,100 kilometers of gas ducts.

Because of its size and economic importance, PETROBRAS is very attractive both to investors and suppliers. The word is then given to Prof. DANILO DE ARAUJO.

Prof. ARAUJO started his speech by explaining the Oil and Gas supply chain in Brazil, pointing out the division between upstream chain (major Oil Companies in the world and their contractors – where corruption mainly happens) and downstream chain (refineries, distribution agents, petrochemical companies *etc*.).

He also presents PETROBRAS historic overview, since its foundation in 1953 to present days, passing through its great technological development during the 1970's and 1980's, especially regarding ultra-deep water oil extraction techniques, and also remarking the change on the Company's main objectives after the Brazilian Workers Party assumed Brazilian presidency in 2003. According to him, the 2002 elections were a game changer for Brazilian state owned companies, especially for PETROBRAS, because it was when the meritocracy managing scheme was abandoned and started a time where the managing values where linked to Workers Party political indications and to oil industry workers union loyal personal. This new mindset led to a very fertile environment for corruption and money deviation.

The outcome was the largest corruption scandal in the world, leading to Brazilian President Dilma Roussef impeachment and giving rise to many prison orders, incarceration of hundreds of PETROBRAS executives and politicians. Prof. ARAUJO finishes his participation concluding that after President Roussef's fall a new era started for Petrobras and its main objective has become to rebuild its reputation and profitability.

Following, Prof. MARIA LUCIA PADUA LIMA started her presentation remarking the Workers Party systemic corruption scheme to provide political power perpetuation. Incited by Prof. JULIET SORENSEN (Pritzker Law School – Northwestern University), Prof. PÁDUA LIMA explained that the best nomination to the PETROBRAS corruption scandal would be "Operation Car Wash". She then clarified how it happened, pointing out its main characters, how it has developed along the years from 2008 until the present and

passing through statistics and data she demonstrated the corruption actions terrible consequences to PETROBRAS, to Brazilian State and to Brazilian economy.

Continuing, she presented three versions for the case: (i) Petrobras victim version; (ii) version of criminal Lawyers representing the involved people; and (iii) the Federal Prosecution Office version. Illustrative cases were then mentioned, such as the Pasadena Refinery, COMPERJ, Abreu de Lima, Urucu-Manaus and São Sebastião-Sete Brasil, giving general explanations about some of them.

Specifics on the Pasadena case were presented by Prof. WANDERLEY FERNANDES. The case regards the acquisition of Pasadena refinery, located in Texas, USA. Prof. FERNANDES indicated the case as an emblematic example about how the previously mentioned scheme was put in movement. The company was acquired by ASTRA, a Belgium group, in the beginning of 2005. Less than six months later, 50% of its equity was acquired by PETROBRAS for approximately US$ 380 million. The negotiated contract provided various unusual conditions, including a put option to ASTRA that, after exercised, has lead the parties to an arbitration procedure by which PETROBRAS ended up paying an amount 22 times higher than the price paid by ASTRA to buy the refinery in the first place.

Prof. PAULO GOLDSCHMIDT brought specific clarifications about the case of Sete Brasil, a company created to intermediate the relationship between Petrobras and the drilling suppliers. It was owned 53% by public institutions (Petrobras and Pension Funds controlled by Workers Party) and 47% by private investors (mainly investment funds and commercial banks). Twenty nine oilrigs were contracted by Sete Brasil to be delivered by Oil and Gas branches of the major Brazilian construction companies organized in joint ventures (Odebrecht, OAS and Queiroz Galvão). For these contracts, Sete Brazil confessed paying bribes of approximately US$ 200 million.

Finally, Prof. FERNANDES closes the presentation considering that Brazilian prosecutors have nicknamed the Brazilian Political System during last 15 Years not as Democracy, but as “Bribeocracy”.

Discussion

Prof. JULIET SORENSEN inquired the speakers how PETROBRAS did not become bankrupt during this process. The Professors answered that the only reasonable explanation would be that Petrobras is a State Owned Company. Prof. EDUARD IVANOV asked if Brazilian political officials have received bribery money only for funding the political parties or if also for personal purposes. Prof. WANDERLEY FERNANDES explained that although a good part of the money diverted from Petrobras and Brazilian Government accounts was used to finance political parties, many people got very rich. He gave the example of a consultancy company hired for almost US$ 1,5 million that delivered a Wikipedia copied report. Prof. EDUARD IVANOV inquired how come the Operation Car Wash was possible in Brazil, considering that it was against the main political party and

a lot of pressure to stop it must have been made. Prof. DANILO DE ARAUJO answered remarking the work of fist level judiciary (judges and prosecutors). Prof. FERNANDES and Prof. PÁDUA LIMA added that Brazilian Institutions have played a very important role by proving their independence and solitude. Prof. PAULO DORON R. DE ARAUJO added that the Operation Car Wash is a result of 10 year learning and training process put in work by Brazilian authorities. A good part of prosecutors and investigators involved in the Operation were educated and trained in the US or Italy.

Closing the first session, Prof. MICHAEL NIETSCH questioned where the money came from during the whole process. And then he stated that probably the good international oil price covered up the problem during a good number of years. But when economic indicators started to reveal problems, then it became easy to discover all the illegalities and crimes committed.

Session 2: *Corruption in an Era of Climate Change: an ever-Closing Circle? – Presentation*

Presented by Professor JULIET S. SORENSEN, from Northwestern University Pritzker Law School, Chicago, USA.

Prof. SORENSEN starts mentioning Frédéric Bastiat's quote on acts consequences or series of consequences on economic sphere: *"In the economic sphere an act, a habit, an institution, a law produces not only one effect, but a series of effects. Of these effects, the first alone is immediate; it appears simultaneously with its cause; it is seen. The other effects emerge only subsequently; they are not seen; we are fortunate if we foresee them"*[1]. She links the quote to the corruption acts and their environmental consequences, especially on dealing with natural disasters.

Projecting a graphic taken from International Disaster Database that shows an increase of natural disasters from 1965 to 2013, Prof. SORENSEN commented, based on a study made by the insurance company Munich Re, that the number of loss events per year, including storms, quakes, volcanoes and tsunamis, has more than doubled since 1980. This brings the discussion about the main priorities that arise just after a disaster. She took the Hurricane Katrina case as example. According to her, the main priorities were: restoring roads, electricity, giving people shelter and food. That is when corruption enters.

Forced by urgency, authorities hire badly to fulfil these first needs, leaving space for corruption and contract price/quality manipulation.

According to US data, the majority of corruption condemnations come from infrastructure investments. Empirical results show that states with higher levels of

[1] CAIN, Seymour [org.], *Selected Essays on Political Economy*, Irvington-on-Hudson, NY, The Foundation for Economic Education, Inc., 1995.

corruption tend to spend more on items on which corrupt officials may levy larger bribes at the expense of others. So based on the empirical evidence, it is possible to hypothesize that corrupt public officials are likely to spend public resources on items for which it is easier to levy larger bribes, such as construction and infrastructure, as opposed to an area of public expenditure like education.

There are academic studies asserting that states hit by natural disasters tend to be more corrupt[2]. Since natural disasters demand expenditures in infrastructure and reconstruction, this is also a fertile field for corruption.

Going further, Prof. SORENSEN correlated earthquake deaths and corruption, proving by data that the more subject to corruption a country is, the greater the number of deaths after an earthquake. She mentioned a study made by seismologists Nicholas Ambraseys and Roger Bilham, published in the January 2011 issue of Nature. The scientists examined the death toll from all earthquakes between 1980 and 2010. They concluded, as the title of their article proclaims, that "Corruption kills". Approximately 83 percent of all deaths from earthquakes during the period considered were in countries where the level of corruption as measured by the Corruption Perception Index exceeded what one would predict given its GDP.

Prof. SORENSEN than raised the hypothesis that public sector corruption results in construction of inferior public infrastructure. It creates the need to rebuild buildings and roads, generating more opportunities for corruption. The problem is that since natural disaster destroys it more easily, high death toll results. So, corruption may be the cause of poor construction and, consequently, the cause of high number of deaths due to natural disasters. This assumption leads to the idea of a vicious circle, where poorly built buildings and roads get easily destroyed by natural disasters, opening opportunities for new construction contracts that will be corruptly closed and executed, generating bad quality constructions that will be easily destroyed by the next natural disaster and so on. This is particularly concerning in an era of climate change, when it is expected to have more and more natural disasters.

Looking to the US legal framework, Prof. SORENSEN spoke about how criminal law deals with this situation. She mentioned a list of US policies, laws and instruments to invigilate public expenditures after natural disasters, making special remark to the US Department of Justice Disaster Fraud Task Force. She also made comments on a list of international instruments to fight corruption (mainly soft law), especially the EU Emergency Response Coordination Centre and their permanent operation in order to avoid emergency and unattended contracting mechanism.

[2] LEESON, Peter T.; SOBEL, Russell S., *Weathering Corruption*, in Journal of Law and Economics, Vol. 51, No. 4, 2008.

The presentation is concluded by quoting another Bastiat's text directed to the legislature or the chief executive: *"but I get him to begin again, entering what is not seen in the ledger beside what is seen"*[3] — to prevent the circle from every closing.

Session 3: ***Corporate Compliance and foreign influence over Italian compliance praxis and legal framework – Presentation***

Presented by Professor SERENA QUATTROCOLO, from University of Torino Law School, Italy.

Prof. QUATTROCOLO started her presentation by reminding that Italy, as many other European nations influenced by German Law, do not establish criminal liability to corporations or legal entities. But time has passed and people came to realize that legal entities have huge impact on society and shall somehow be accountable regarding criminal matters. Internationally, Italy is part of the 1997 OECD Convention. It has influenced Italian scholars and businessmen to a compliance solution, trying to make corporations administratively liable for crimes committed by their employees and representatives.

In the year of 2001, Italian congress passed the Corporate Compliance Act (Legislative Decree n. 231/2001), implying private and public companies and also public bodies developing economic activities. It does not regulate States, Regions, Municipalities and other public bodies, neither offices nor bureaus.

According to Prof. QUATTROCOLO, the 2001 act based its existence on the presumption that when someone in a private company commits a crime while acting in name or in interest of the firm, it is due to a failure of the company's compliance program.

This presumption created an interesting movement in Italian business environment: it became mandatory to every Italian company to have a very detailed compliance program, in order to avoid liability based on lack of internal rules. Parallelly to this run to avoid criminal liability through compliance regulation failure, from 2001 to today, Italian lawmakers added many crimes to the original corporate crime liability list. For example, white collar, intellectual property and environmental crimes became liable to Italian legal entities.

Once the Italian legal development was clarified, Prof. QUATTROCOLO moved to procedural matters. She explained that once an authority gets notice of a crime allegedly committed by someone in the interest of a corporation, an administrative investigation begins. After concluding the investigation, an administrative trial is held in front of a criminal court. If the company is found liable, the award can be challenged to the Appeal Court or to the Supreme Court.

[3] CAIN, Seymour [org.], *op. cit.*

In order to provide empirical data, Prof. QUATTROCOLO addresses Italian Supreme Court Case-law, arriving to three conclusions:

a) two possible fundaments to make a corporation liable: crime committed in interest of the corporation or crime committed for the convenience of the corporation. The act itself is not the center of investigation, but how the act reveals the activity of corporation is crime oriented or crime permissive.;
b) resulting companies of a merging operation is liable for crimes committed by employees of both originating entities; and
c) corporations must be punished even if or specially if no person is found guilty for the crime committed.

As a conclusion of the presentation, Prof. QUATTROCOLO points out the actual trends regarding corporate criminal liability in Italy. She states that since Italian lawmakers were so long-winded in expanding the list of crimes and situations leading to corporate liability, even if any single person is found responsible, Italian administrative and judicial courts are inclined to seek out casuistic subterfuges to exempt companies from any responsibility, on the ground that whoever is able to answer for everything ends up not responding for anything. Otherwise, it would become prohibitive to engage in any business activity in Italy.

Discussion

Prof. MICHAEL NIETSCH asked if there were a disgorgement of profits sanction predicted by the Italian Act, explaining that in many cases profits obtained through crime committing exceeds hugely the maximum legal amount for fines, what may lead to the conclusion that crime is more profitable than establishing an effective compliance program. Prof. QUATTROCOLO answered negatively to the question, revealing concern on the matter. Following, Prof. EDUARD IVANOV inquired if this liability scheme would make a corporation liable for hiring or keeping employees that are part of organized crime or terrorist organizations. Prof. QUATTROCOLO answered that main criteria adopted by administrative and judicial Italian Courts was the company interest or convenience. So, the isolated fact that an employee is part of an organized crime or terrorist organization is not sufficient to make the company liable. However, if it is proven that the employee participation in such organizations is at least convenient to the company, the entity shall be liable.

Session 4: *Anti-corruption compliance in the Russian Federation – Discussion*

Presented by Professor EDUARD IVANOV, from International Anti-Corruption Academy, Laxenburg, Austria.

Prof. IVANOV started by referring to Federal Russian Law 273-FZ/2008 which has defined corruption under Russian criminal liability. He explained that, according to contemporary legal framework, there is no corporate criminal or corruption liability in

Russia. However, Russian General Prosecution Office edited an act, in 2013, defining corruption acts.

Regarding corporation's administrative liability in case of employees committing crimes on their behalf, Russian Federal Law 231-FZ have obliged companies to implement compliance programs to prevent corruption, but any sanction was predicted in case of violation of this duty.

Prof. IVANOV then stated that once law is not clear about punishing corruption, it is up to the Judiciary Power to define if a lack of compliance program or a defect on a compliance program can be used as fundament on making a corporation administrative liable for a crime committed by a representative or employee.

This situation gives margin to interpretation, leading to insecurity and unpredictability. Therefore, many important Russian companies are including anti-corruption clauses (covenants) in its contracts, to avoid any implications regarding anti-corruption compliance matters. The problem remains with medium and small companies, since it is expensive to implement a reliable compliance program.

As a response to this financial obstacle, there are some collective initiatives going on. Some commerce chambers and other institutions have corporate compliance incentive programs aimed at avoiding problems with corruption and other crimes. These programs seek to disseminate good practices and international experiences to the average Russian businessmen, so that they can exercise their activity with a minimum of predictability and security.

Prof. IVANOV remarked some collective initiatives such as the 2012 Anti-Corruption Charter of the Russian Business, supported by the Russia Chamber of Commerce and Industry. He also mentioned the Russian Compliance Alliance, supported by the American Chamber of Commerce, started in 2012, and the International Leaders Business Forum's. This last one is focused on public-private transactions, especially tender procedures transparence and other matters. According to him, these initiatives provide real support to their members when facing corruption problems such as influence traffic and extortion.

However, despite of the private initiatives on searching for corporate solutions to fight corruption, it is undeniable that Russian legislation needs to go further on this matter, in order to provide security and foreseeability to economic agents.

Concluding his speech, Prof. IVANOV addressed the necessity of creating tailor-made compliance programs for Russian companies, considering the legal framework available, the initiatives taking place and the local culture on giving and receiving gifts and hospitality, identifying the real owners *etc*. Also, there is the question about which company department is responsible for creating and implementing the compliance program, since there is a gray zone between the so-called compliance sector, the legal department and the "economic security" sector.

Session 5: ***Indian Anti-Corruption Environment: New Laws and other developments – Presentation***

Presented by Professor ABHISHEK BHARTI, from International Anti-Corruption Academy, Laxenburg, Austria.

Prof. BHARTI started his speech by saying that although the development of anti-corruption instruments in India is recent, since the 2nd Century B.C. there are legal and literary reference to corruption as being part of Indian commercial and military culture. In 1858, for example, Eastern India Company created the "No Gifts Policy & Indian Service Rules".

After that, the Indian Criminal Code, in 1860, predicted corruption crimes to public officials only. Nevertheless, corruption is endemic in India and corruption scandals happen all the time, from people taking money from poor people promising them huge interests and disappearing with money from businesspersons simply buying parliament members to vote in favor or against any bill or law project.

By projecting the Transparency International Corruption Perception Index Map, Prof. BHARTI raised the hypothesis that rich countries might be supporting corruption on poor countries, since it is profitable to companies based on rich countries to use corruption in underdeveloped nations in their favor, in order to subvert rational competition rules and obtain various advantages.

Prof. BHARTI then addressed Asian Regional Covenants on anti-corruption rules and corporate compliance, remarking informal anti-corruption mechanisms in place such as SAARC, APEC, ASEAN, BRICS and the Bangalore Principles of Judicial Behavior (2002 - UNODC).

Entering Indian domestic anti-corruption matters, he points out a trend on human rights-based approach to anti-corruption, as people are going to courts to oblige State to offer anti-corruption action and effectiveness.

As an example, Prof. BHARTI mentioned that in November 2016 Indian government approved a demonetization act taking 86% of currency out of circulation, in the intention of creating a cashless economy. The government claimed that the action would curtail the shadow economy and crack down on the use of illicit and counterfeit cash to fund illegal activity and terrorism.

The sudden nature of the announcement and the prolonged cash shortages in the weeks that followed created significant disruption throughout the economy, threatening economic output. The move was heavily criticized as poorly planned and unfair, and was met with protests, litigation, and strikes. However, the move is considered as a bold initiative and a policy innovation that has a potential to change behaviors and introduce transparency in the economy.

There are also some civil society initiatives like the “zero rupees note” and “ipaidbribe.com”, all directed to create an anti-corruption resistance culture in Indian people.

Prof. BHARTI commented about the “India Against Corruption Movement”, which started as a movement for anti-corruption laws in India and experienced partial success having the Lokpal Act approved by Indian Parliament in 2013. The Act established the institution of Lokpal or Ombudsman to inquire into allegations of corruption against public functionaries. Ombudsman is required to conduct a preliminary inquiry within 30 days. If there is not a *prima facie* case, the matter is closed. If the case is established, the investigation has to be completed within six months. Besides, all the government employees are liable to declare their assets and liabilities.

However, this law let the Prime Minister and the Judiciary out of the coverage, what brought criticism and lack of trust on the new legislation.

Prof. BHARTI then listed all the Indian laws regarding anti-corruption matters:

- Representation of People’s Act, 1951;
- Prevention of Money Laundering Act, 2002;
- Prevention of Corruption Act, 1988 , Amendment Bill, 2013;
- Central Vigilance Act , 2003;
- Right To Information Act , 2005;
- Lokayukta Act, 2013 (Ombudsman Act);
- Companies Act , 2013;
- Whistleblowers Protection Act, 2014;
- The Black Money (Undisclosed Foreign Income and Assets) and Imposition of Tax Act , 2015; and
- The *Benami* Transactions (Prohibition) Amendment Act, 2016.

He also mentioned anti-corruption law projects currently in pipeline:

- The Judicial Standards and Accountability Bill, 2010;
- The Citizen's Charter and Grievance Redressal Bill, 2011;
- The Prevention of Bribery of Foreign Public Officials and Officials of Public International Organizations Bill, 2011 (Indian Version of FCPA); and
- The Public Procurement Bill, 2012.

Coming to conclusion, after making comments on anti-corruption case law in India (especially three cases: Diageo, York International, Textron Inc.), Prof. BHARTI finishes

his presentation by reminding that anti-corruption efforts must be constant and evolutionary, since corruption is always seeking a way to anticipate legislation and dismiss law enforcement agents.

Concluding Remarks

To finish the works pf the day, Prof. NIETSCH thanked Prof. IVANOV again for making possible that IACA hosted the LSGL Compliance and Anti-Corruption Research Group Meeting. He also thanked each of the speakers as well as the others present and invited everyone to attend the annual conference in Mexico City in July 2017.

The group discussed options for future research. A potential area of focus was the field of corporate internal investigations. This as well as the enlargement of the research group shall be discussed during the AGM in Mexico City.

Laxenburg, Austria, February 27th, 2017.