

Alert | Global Anti-Corruption Enforcement & Compliance



January 2025

FCPA Year in Review 2024

The Department of Justice (DOJ) and the Securities and Exchange Commission (SEC) obtained over \$1.28 billion in total fines and penalties related to Foreign Corrupt Practices Act (FCPA) violations in 2024, making it one of the top 10 highest grossing years with regard to enforcement penalties in the FCPA's nearly 50-year history. Foreign governments and other branches of the U.S. government recovered an additional \$400 million in global settlement amounts related to those FCPA enforcement actions. The U.S. government also announced charges against 19 individuals for FCPA and FCPA-related conduct.

Beyond the enforcement cases, the DOJ issued both new guidance and updates to existing guidance regarding its approach to corporate crime and its expectations surrounding corporate compliance efforts. The DOJ's recent updates to its Evaluation of Corporate Compliance Program guidance focuses on (1) the risks associated with emerging technology, such as AI; (2) the resource allocation and amount of access to data by the company's compliance functions; (3) incentivizing whistleblowers; (4) the importance of post-acquisition compliance integration; and (5) ensuring companies incorporate lessons learned from misconduct. Furthermore, the DOJ launched a new pilot program for whistleblowers to report corporate misconduct and announced incentives for individuals who voluntarily self-disclose criminal conduct.

The following is a snapshot of 2024 FCPA enforcement:

FCPA 2024 YEAR IN NUMBERS

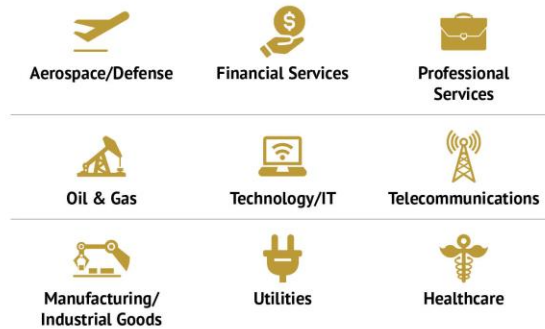
Enforcement Cases and Settlement Amounts



Announced FCPA and FCPA-Related Actions Against Individuals



Industries Most Affected



Where Improper Conduct Occurred



Author

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