

Your FCPA Compliance Solution

INTRODUCING AN EFFECTIVE AND AFFORDABLE FOREIGN CORRUPT PRACTICES ACT (FCPA) COMPLIANCE SOLUTION.

Now companies that don't have *Fortune* 100 compliance resources can implement an FCPA compliance solution that meets the U.S. government's standards – and access Foley's FCPA legal experience. All for a fixed annual fee.

Today, FCPA enforcement is second only to terrorism on the U.S. Department of Justice's priority list. And recent enforcement activity shows that this aggressive enforcement agenda is expanding beyond the *Fortune* 100 to include mid-cap companies that have traditionally not garnered as much government attention. In fact, in announcing a recent FCPA settlement with Smith & Wesson, the chief of the SEC Enforcement Division's FCPA Unit said, "This is a wake-up call for small and medium-size businesses that want to enter into high-risk markets and expand their international sales."

This shifting dynamic has created a quandary for companies that have significant global operations or sales but do not want or are unable to devote the internal administrative and legal resources required to develop and implement a compliance program. For far too long, law firms with real FCPA experience have ignored these companies, preferring instead to focus on the biggest of the big global companies.

We're changing the game.

Foley Global Risk Solutions (GRS) provides a comprehensive, technology-driven FCPA compliance program. Going far beyond an ordinary legal services offering, GRS is a fully integrated, actionable solution that addresses the hallmarks of an effective anti-corruption compliance program noted in *A Resource Guide to the U.S. Foreign Corrupt Practices Act*, released by the United States Department of Justice and the U.S. Securities and Exchange Commission.

FOR MORE INFORMATION

In today's ever-evolving regulatory environment, can your company really afford not to have the right internal controls in place? Foley is here to help. Contact Foley Partner **David Simon** at 414.297.5519 or dsimon@foley.com today.

The service includes the following components:

- Risk assessments
- FCPA/anti-bribery policies and procedures
- Communications and updates on FCPA enforcement
- Training, including basic training for relevant employees around the world, and high-level training for senior executives
- **Legal advice and counsel** on any FCPA or anti-bribery question or issue that arises in your organization
- Annual board of directors or senior management reports, along with quarterly updates to internal legal/compliance
- Periodic risk monitoring and program updates
- All for a fixed annual fee for ease of budgeting

GRS also offers the confidence of knowing that if an FCPA issue should arise, your program is backed by the depth of experience and know-how of Foley's FCPA and anti-bribery practice.