

Criminal Liability Risks for Compliance Officers: A Multi-Jurisdictional Perspective - Part II

Corporate Counsel
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[In this article](#), the second of a two-part series, Ann Sultan, along with her colleagues at Simmons & Simmons, Debevoise & Plimpton, and Freshfields Bruckhaus Deringer, surveyed the criminal enforcement risks for compliance officers focusing on companies operating in the United Kingdom, Germany, and Ukraine. The authors noted that of the six jurisdictions canvassed, only Germany has "a specific regime for holding compliance officers criminally liable for offenses committed on their watch." However, unless "compliance officers had active and knowing involvement in violations, we are aware of no attempts to seek criminal convictions of compliance officers for anti-bribery and anti-corruption-related misconduct," the authors wrote, adding that "in each jurisdiction, we have observed a more or less recent trend of increased focus on holding individuals criminally responsible for corporate misconduct."