

Kathryn Cameron Atkinson Interviewed by James Tillen for IBA's Anti-Corruption Committee Interview Series

"IBA Anti-Corruption Committee Interview with Kate Cameron Atkinson"

International Bar Association

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Kathryn Cameron Atkinson is interviewed by James Tillen in the [second episode](#) of the Anti-Corruption Committee interview series hosted by the International Bar Association (IBA). Atkinson is the only woman to have served twice as a Foreign Corrupt Practices Act (FCPA) Independent Compliance Monitor, and discussed tips and lessons learned from her experiences as a Monitor and as counsel to companies working with Monitors to select Monitor candidates wisely and to optimize the value of what can be a painful experience for companies. Among other tips, Atkinson notes "The Monitor needs to not only identify gaps in the program it controls, but they're obligated to recommend how one closes those gaps," placing a premium on compliance expertise, though even with that expertise, she notes a monitor should come prepared to "listen and learn" to ensure that their recommendations are tailored to each company's situation. Both sides, she says, need to see the task as moving as "quickly and cost efficiently" as possible to an effective program, which requires "collaboration and transparency" and a recognition that truly effective FCPA compliance "improves the overall financial health and long term sustainability of success for a company."