

OECD Working Group on Bribery

Public Summary Record

Plenary Meeting
11-14 March 2025



Country reports on implementation of the Anti-Bribery Convention and the 2021 Anti-Bribery Recommendation

The Working Group:

- Adopted Belgium's Phase 4 report including an executive summary and recommendations, as well as a [press release](#). Invited Belgium to report back in writing in March 2027 on the implementation of all recommendations, follow-up issues, and enforcement of the foreign bribery offence.
- Heard an update from Germany on the outcome of the parliamentary election and ongoing coalition negotiations. Welcomed Germany's acknowledgement of the Chair's letter and the continued engagement of relevant ministries. Agreed that Germany will submit a written expedited report in June 2025 on developments related to the Coalition Agreement and implementation of the Working Group's Phase 4 recommendations concerning corporate liability reforms.
- Considered Norway's Phase 4 additional follow-up report and noted limited progress on key recommendations. Invited Norway to submit a further additional follow-up report in March 2027 on legislative progress, prosecutorial guidelines, ØKOKRIM's capacity, and enforcement actions. Agreed to send a letter to the Minister of Justice urging action on critical reforms.
- Considered Spain's Phase 4 two-year written follow-up report and adopted the summary and conclusions. Noted varying levels of progress, with several recommendations fully, partially, or not implemented. Invited Spain to submit a further written report in March 2027 on selected recommendations and to report annually on foreign bribery enforcement. Agreed to send a letter from the Chair to the Minister of Justice expressing concern over Spain's implementation of the Convention.
- Heard Hungary present its revised action plan to address Working Group recommendations, which was positively assessed by members of the Hungary monitoring sub-group. Agreed to further follow up on Hungary's implementation of Working Group recommendations in June 2025 and to reflect the March 2025 plenary discussion in a letter from the Chair.
- Noted with regret the delay in Denmark's submission of its one- and two-year follow-up reports and expressed concern regarding its limited engagement in the monitoring process. Heard Denmark apologise for these delays and reaffirm its commitment to the Anti-Bribery Convention. Agreed to invite Denmark's Ambassador to the June 2025 plenary and underlined the importance of maintaining Working Group monitoring deadlines.
- Heard the United States provide an oral update on the Executive Order dated 10 February 2025 entitled "Pausing Foreign Corrupt Practices Act Enforcement to Further American Economic and National Security". Heard other Parties express concerns regarding the Order's potential implications for implementation of the Convention. Invited the United States to report back to the Working Group in June 2025.
- Heard the outcomes of the hybrid technical and high-level missions to Slovenia in February 2025. Welcomed Slovenia's constructive engagement and political commitment to legislative reforms, expressed during the hybrid missions. Invited Slovenia to submit a written report in March 2026 on the implementation of certain Phase 4 recommendations and foreign bribery enforcement.
- Welcomed Mexico's presentation of its action plan to implement Phase 4 recommendations 2(a) on whistleblower protection and 4(b) on legal person liability. Noted concern over the absence of foreign bribery investigations as of March 2025. Invited Mexico to submit a written report on the implementation of its action plan and on enforcement in December 2025 to the Working Group, which may then consider additional measures.

- Assessed Poland's action plan for addressing Phase 4 recommendations as insufficient. Invited Poland to submit a revised action plan in June 2025, with specific actions and timelines, and encouraged Poland to engage with the lead examiners in this process.
- Heard the outcomes of the high-level mission to Peru in January 2025, which focused on Working Group concerns including prosecutorial independence, legislative changes, and the impact of anti-corruption efforts. Peru expressed its commitment to addressing the Working Group's concerns and highlighted some developments since the high-level mission. Invited Peru to provide a written update in June 2025, including on legislative changes, enforcement actions, and on the status of concerns raised during the mission.
- Heard Australia provide an update on the 2024 Crimes Legislation Amendment (Combating Foreign Bribery) Act, which introduced a new offence of failure to prevent foreign bribery and amended existing laws to address law enforcement challenges. Australia also reported the passage of the AML/CFT Amendment Act, addressing high-risk sectors and establishing reporting obligations for new entities starting in 2026. Australia reported that while a deferred prosecution agreement (DPA) scheme was considered, it was not pursued at this stage but that there are plans to evaluate DPAs' feasibility after the implementation of the new amendments.

Ongoing and future Working Group projects and events

The Working Group:

- Heard the Chair report that at its 10 March 2025 meeting, the Management Group discussed the group's role and objectives, possible changes to the organisation of Working Group meetings to make them more efficient, monitoring items for the March plenary, and global relations highlights.
- Heard the Secretariat provide an update on the 2025 [Global Anti-Corruption and Integrity Forum](#) and Integrity Week, which took place 24-28 March 2025.
- Heard the Secretariat provide an update on the Working Group's Programme of Work and Budget (PWB) for 2025-2026. Heard France announce a voluntary contribution to support the Working Group PWB. Heard Canada and the United Kingdom enquire after procedures for funding the Chair's travel and request to discuss this topic again during the June 2025 plenary.
- Heard the Secretariat present the Country Monitoring Dashboard, which is expected to be published in the second quarter of 2025 on the OECD website. Heard a number of delegations support the Dashboard. Noted that the Dashboard will be updated after each plenary meeting and published in French as soon as resources allow.

Global relations activities

The Working Group:

- Heard the Secretariat present the updated draft Global Relations Strategic Directions (GRSD) for 2025-26, which must be updated each biennium per OECD Council instructions. Heard support for the GRSD from several countries with regard to the GRSD's updated approach to engaging with non-Members. Heard the Chair note the GRSD will be circulated to the Working Group for comment by written procedure.

Reports from other OECD bodies, invitee countries and international organisations

The Working Group:

- Heard updates from Business at OECD (BIAC), the European Public Prosecutor's Office (EPPO), European Commission, the Financial Action Task Force (FATF), the Group of States Against Corruption (GRECO), the United Nations Office on Drug and Crime (UNODC), and the World Bank, regarding reforms and actions taken in the last year of interest to the Working Group.

- Heard Mauritius present its final report as a Participant, highlighting major reforms through the Financial Crimes Commission Act 2023. Heard Mauritius orally express its intention to request accession to the OECD Anti-Bribery Convention before the June 2025 plenary.
- Heard Saudi Arabia report progress under its Roadmap and Action Plan, including legislative updates and self-assessments. The Chair noted expectations for a formal accession request by the end of Saudi Arabia's Participant status in 2026.
- Heard Ukraine inform the Group of its formal request to accede to the Convention, submitted by the Ukrainian Prime Minister to the OECD Secretary-General in February 2025.
- Heard an update from South Africa on the first 2025 G20 Anti-Corruption Working Group (ACWG) meeting, held 3-5 March 2025 in Cape Town. France and Italy supported South Africa's assurance that the G20 ACWG will again hold the annual joint meeting between the G20 ACWG and the Working Group on Bribery in 2025.

Tour de table

The Working Group:

- Heard updates from Argentina, Austria, Belgium, Brazil, Bulgaria, Canada, Colombia, Costa Rica, Croatia, Estonia, Finland, Germany, Korea, South Africa, and Spain, while oral updates for Chile, Denmark, the Russian Federation, and the United States were postponed to June 2025. The Chair encouraged more countries to provide updates and new cases in writing to ensure the Matrix remains accurate and up-to-date, and to review their Matrix entries and submit deletion requests where appropriate.