

# Enforcement data of the OECD Anti-Bribery Convention 1999-2024

OECD Working Group on Bribery  
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## HIGHLIGHTS

### Concluded cases

From the entry into force of the OECD Anti-Bribery Convention on 15 February 1999 through 31 December 2024:

- 25 Parties have, collectively, convicted or sanctioned at least 752 natural and 315 legal persons for foreign bribery through criminal proceedings;
- 7 Parties have, collectively, sanctioned at least 66 natural and 135 legal persons for foreign bribery through administrative or civil proceedings;
- 11 Parties have, collectively, convicted or sanctioned at least 96 natural and 128 legal persons for related offences (e.g. false accounting, money laundering, embezzlement, tax evasion) through criminal proceedings; and
- 2 Parties have, collectively, sanctioned at least 79 natural and 215 legal persons for related offences through administrative or civil proceedings.

### Pending matters

As of 31 December 2024:

- 27 Parties reported having, collectively, 478 ongoing investigations for foreign bribery;
- 17 Parties reported having, collectively, ongoing criminal proceedings for foreign bribery against 253 natural and 29 legal persons; and
- 3 Parties reported having, collectively, ongoing administrative or civil proceedings for foreign bribery against 6 natural and 3 legal persons.

By ratifying the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (the OECD Anti-Bribery Convention), the Parties pledge to work together to fight foreign bribery. This report contains an overview of the Parties' enforcement efforts since the Convention's entry into force on 15 February 1999. More information about the implementation and enforcement of the OECD Anti-Bribery Convention, including the Parties' mutual evaluations of their implementation of the Convention, through the Working Group on Bribery, is available online at: <https://www.oecd.org/en/topics/fighting-foreign-bribery.html>.

## OVERVIEW OF THE ENFORCEMENT DATA

The following tables provide an overview of the enforcement data reported by Parties to the OECD Anti-Bribery Convention. The data for each country cover the period from the Convention's entry into force in that country to 31 December 2024. The data distinguish foreign bribery from other related offences covered by the Convention, in particular accounting misconduct and money laundering related to the bribery of foreign public officials. Enforcement data on cases against individuals and entities are recorded separately.

The Annex "Methodology for Enforcement Data" provides further context for the data presented.

**Table 1A. Decisions on criminal foreign bribery cases**

Number of individuals and legal persons sanctioned or acquitted							
Party to the Convention	Convention entry into force	% share of world GDP <sup>1</sup>	% share of world exports <sup>1</sup>	Sanctioned (agreed or imposed)		Acquitted	
				Natural persons	Legal persons	Natural persons	Legal persons
Argentina	2001	0.58	0.33	0	0	0	0
Australia	1999	1.56	1.39	7	3	3	0
Austria	1999	0.48	0.87	7	0	22	3
Belgium	1999	0.61	2.19	9	2	15	5
Brazil	2000	1.93	1.38	0	0	0	0
Bulgaria	1999	0.11	0.19	1	0	0	0
Canada <sup>2</sup>	1999	1.95	2.33	4	4	8	0
Chile	2001	0.30	0.41	2	1	0	0
Colombia	2013	0.37	0.20	0	0	0	0
Costa Rica	2017	0.09	0.09	0	0	0	0
Croatia	2024	0.09	0.11	0	0	0	0
Czechia	2000	0.33	1.08	0	0	0	0
Denmark	2000	0.39	0.54	0	3	0	0
Estonia	2005	0.04	0.08	2	0	0	0
Finland	1999	0.27	0.32	0	0	18	4
France	2000	2.87	2.61	29	35	18	1
Germany <sup>3</sup>	1999	4.28	6.88	370	12	2	0

<sup>1</sup> Based on OECD national accounts, Eurostat, and national statistical offices.

<sup>2</sup> For **Canada**: One of the legal persons listed above pleaded guilty to one count of fraud in connection with a foreign bribery scheme.

<sup>3</sup> For **Germany**: Due to a change in methodology to align the enforcement data in this report with the data in Germany's Phase 4 evaluation report, the German data before 2017 are not comparable to the data reported for 2017 or thereafter. Furthermore, the sanctions reported include those imposed in the context of proceedings terminated after the accused or indicted accused complied with the conditions and instructions (e.g. payment of a sum of money to a non-profit-making institution) imposed by the public prosecution office or the court (Section 153a(2) Code of Criminal Procedure – CCP (*Strafprozessordnung*)). As of Germany's Phase 3 evaluation, it was not possible to identify which sanctions imposed under Section 153a CCP were for foreign bribery and foreign bribery-related offences. Therefore, the data include sanctions imposed under that provision for both foreign

Number of individuals and legal persons sanctioned or acquitted							
Party to the Convention	Convention entry into force	% share of world GDP <sup>1</sup>	% share of world exports <sup>2</sup>	Sanctioned (agreed or imposed)		Acquitted	
				Natural persons	Legal persons	Natural persons	Legal persons
Greece	1999	0.24	0.22	0	0	5	0
Hungary	1999	0.21	0.64	26	0	2	0
Iceland	1999	0.03	0.03	0	0	0	0
Ireland	2003	0.60	0.99	0	0	0	0
Israel <sup>4</sup>	2009	0.52	0.25	5	3	0	0
Italy	2001	2.17	2.76	22	10	42	6
Japan	1999	3.65	2.89	22	4	0	0
Korea	1999	1.59	2.80	26	9	11	0
Latvia	2014	0.04	0.08	0	2	0	0
Lithuania	2017	0.08	0.16	0	0	0	0
Luxembourg	2001	0.09	0.07	9	0	3	0
Mexico	1999	1.59	2.52	0	0	0	0
Netherlands	2001	1.13	3.77	5	10	1	0
New Zealand	2001	0.22	0.17	0	0	0	0
Norway <sup>5</sup>	1999	0.44	0.69	4	4	5	1
Peru	2018	0.27	0.30	0	0	0	0
Poland	2000	0.89	1.55	1	0	0	0
Portugal	2001	0.29	0.35	0	0	1	0
Romania	2023	0.36	0.41	0	0	0	0
Slovakia	1999	0.13	0.47	0	0	0	0
Slovenia	2001	0.07	0.32	0	0	0	0
South Africa	2007	0.36	0.45	0	0	0	0
Spain	2000	1.61	1.73	4	0	2	3
Sweden	1999	0.57	0.80	6	0	9	2
Switzerland <sup>6</sup>	2000	0.86	1.83	17	15	2	0

bribery and foreign bribery-related offences. Data also include sanctions imposed under section 299 CC in foreign bribery cases (since the entry into force of the Convention).

<sup>4</sup> For **Israel**: Figures include a legal person criminally sanctioned in a case involving foreign bribery-related facts, but which was resolved under securities law. The statistical data for Israel are supplied by and under the responsibility of the relevant Israeli authorities. The use of such data by the OECD is without prejudice to the status of the Golan Heights, East Jerusalem and Israeli settlements in the West Bank under the terms of international law.

<sup>5</sup> For **Norway**: The figures include cases resolved via a penalty notice under Criminal Procedure Act (CPA) paragraph 258) but not "*påtaleunntatelse*" decisions under CPA paragraph 69.

<sup>6</sup> In **Switzerland**, while foreign bribery cases can be pursued either at the federal or cantonal level, the Office of the Attorney General of Switzerland (OAG) initiates the vast majority of such cases. As the cantons are not required to report their cases to the OAG, the data contained in this table only reflect federal cases as well as those cases delegated by the cantons to the OAG.

Number of individuals and legal persons sanctioned or acquitted							
Party to the Convention	Convention entry into force	% share of world GDP <sup>1</sup>	% share of world exports <sup>1</sup>	Sanctioned (agreed or imposed)		Acquitted	
				Natural persons	Legal persons	Natural persons	Legal persons
Türkiye	2000	1.34	1.07	0	0	1	0
United Kingdom	1999	3.38	2.10	23	17	27	1
United States <sup>7</sup>	1999	26.13	8.44	151	181	4	0
<b>TOTAL (entire WGB)</b>		<b>65.11</b>	<b>58.86</b>	<b>752 natural persons sanctioned, including through plea agreements or other resolutions</b>	<b>315 legal persons sanctioned, including through plea agreements, NPAs, DPAs, or other resolutions</b>	<b>201 natural persons acquitted</b>	<b>26 legal persons acquitted</b>

Table 1B. Decisions on administrative and civil foreign bribery cases<sup>8</sup>

Number of individuals and legal persons sanctioned or found not liable							
Party to the Convention	Convention entry into force	% share of world GDP	% share of world exports	Sanctioned (agreed or imposed)		Found not liable	
				Natural persons	Legal persons	Natural persons	Legal persons
Australia	1999	1.56	1.39	0	3	0	0
Brazil	2000	1.93	1.38	0	4	0	0
Colombia	2013	0.37	0.20	0	2	0	0
Germany	1999	4.28	6.88	7	5	0	0
Israel	2009	0.52	0.25	0	2	0	0
United Kingdom	1999	3.38	2.10	0	10	1	0
United States <sup>9</sup>	1999	26.13	8.44	59	109	2	0
<b>TOTAL (relevant countries)</b>		<b>38.17</b>	<b>20.65</b>	<b>66</b>	<b>135</b>	<b>3</b>	<b>0</b>

In addition, the numbers reported here do not take into account exemptions from punishment under Article 53 of the Swiss Criminal Code.

<sup>7</sup> For the **United States**: This row records the number of criminal cases prosecuted by the US Department of Justice either for violations of the anti-bribery provisions of the Foreign Corrupt Practices Act (FCPA) or for violations of both the anti-bribery provisions and the books and records and internal controls provisions of the FCPA. Therefore, this Table does not reflect criminal sanctions that have been imposed exclusively for violations of the books and records and internal controls provisions of the FCPA. The data also reflect declinations with disgorgement concluded under the FCPA Corporate Enforcement Policy.

<sup>8</sup> Only those countries that have reported additional sanctions ordered under administrative and/or civil procedures have been listed in Table 1B. Note that some countries have criminal and administrative/civil sanctions for foreign bribery, and in some cases persons sanctioned in civil proceedings have also been sanctioned in criminal proceedings.

<sup>9</sup> For the **United States**: This row records the number of administrative and civil enforcement actions of the US Department of Justice and the US Securities and Exchange Commission that have led to sanctions for violations of the anti-bribery provisions of the FCPA either alone or in conjunction with violations of the books and records and internal controls provisions of the FCPA, whether through a court decision, an administrative order, or through another resolution. Therefore, this Table does not reflect civil or administrative sanctions that have been imposed exclusively for violations of the books and records and internal controls provisions of the FCPA.

Table 2A. Decisions on criminal cases for other offences related to foreign bribery<sup>10</sup>

Number of individuals and legal persons sanctioned or acquitted							
Party to the Convention	Convention entry into force	% share of world GDP	% share of world exports	Sanctioned		Acquitted	
				Natural persons	Legal persons	Natural persons	Legal persons
Australia	1999	1.56	1.39	3	0	0	0
Austria	1999	0.48	0.87	0	1	1	0
Brazil	2000	1.93	1.38	0	0	8	0
Finland	1999	0.27	0.32	3	0	1	0
Germany	1999	4.28	6.88	25	4	0	0
Israel	2009	0.52	0.25	6	1	0	0
Italy	2001	2.17	2.76	5	0	2	0
Korea	1999	1.59	2.80	4	1	0	0
Luxembourg <sup>11</sup>	2001	0.09	0.07	0	1	0	0
Netherlands <sup>12</sup>	2001	1.13	3.77	3	12	1	0
Sweden	1999	0.57	0.80	1	0	0	0
United States <sup>13</sup>	1999	26.13	8.44	46	108	3	0
<b>TOTAL (relevant countries)</b>		<b>40.71</b>	<b>29.73</b>	<b>96 natural persons sanctioned, including through plea agreements or other resolutions</b>	<b>128 legal persons sanctioned, including through plea agreements, NPAs, DPAs, or other resolutions</b>	<b>16 natural persons acquitted</b>	<b>0 legal persons acquitted</b>

<sup>10</sup> Only those countries that have reported criminal sanctions for offences related to foreign bribery have been listed in Table 2A. "Other offences related to foreign bribery" includes offences falling under Articles 7 (Money Laundering) and 8 (Accounting) of the Convention. Examples include books and records violations, failure to implement sufficient internal controls, *abus de biens sociaux* (misuse of company assets), and *Untreue* (breach of trust based on a failure to supervise).

<sup>11</sup> For **Luxembourg**: Six natural persons were convicted of forgery in connection with a foreign bribery scheme; one natural person was convicted of trading in influence.

<sup>12</sup> For the **Netherlands**: One legal person was sanctioned for multiple anti-money-laundering violations, encompassing at least one count of money laundering predicated on foreign bribery.

<sup>13</sup> For the **United States**: This row records the number of criminal cases prosecuted by the US Department of Justice for violations of the books and records and internal controls provisions of the FCPA as well as supply-side money laundering violations predicated on foreign bribery either alone or in combination with violations of the FCPA anti-bribery provisions.

Table 2B. Decisions on administrative/civil cases for other offences related to foreign bribery<sup>1</sup>

Number of individuals and legal persons sanctioned or found not liable							
Party to the Convention	Convention entry into force	% share of world GDP	% share of world exports	Sanctioned (agreed or imposed)		Found not liable	
				Natural persons	Legal persons	Natural persons	Legal persons
Israel	2009	0.52	0.25	3	2	0	0
United States <sup>2</sup>	1999	26.13	8.44	76	213	2	0
<b>TOTAL (relevant countries)</b>		<b>26.65</b>	<b>8.69</b>	<b>79 natural persons sanctioned, through civil or administrative proceedings or other resolutions</b>	<b>215 legal persons sanctioned, through civil or administrative proceedings or other resolutions</b>	<b>2 natural persons found not liable</b>	<b>0 legal persons found not liable</b>

## ANNEX: METHODOLOGY FOR ENFORCEMENT DATA

### Collection and presentation of enforcement data

**Tables 1A and 1B** present data that the Parties to the OECD Anti-Bribery Convention have agreed to provide on a *mandatory* basis as part of the Working Group on Bribery's law enforcement data collection exercise. They show the number of criminal cases (in Table 1A), and administrative and civil cases (in Table 1B) of foreign bribery that have resulted in a final court disposition, such as a criminal conviction or acquittal, or similar findings under a non-criminal procedure. The tables report the number of sanctions that have been imposed on individuals and entities in criminal, administrative, and civil proceedings for foreign bribery and for failures to prevent a proven case of foreign bribery in the Parties to the Anti-Bribery Convention from its entry into force in February 1999. The following additional points about these tables should be noted:

- **In certain countries, the liability of legal persons is an administrative liability** but legal persons are sanctioned in connection with a criminal offence in the context of a criminal case.
- The tables include data provided by countries on a *voluntary* basis on non-trial resolutions, i.e. foreign bribery cases that have been resolved through an agreement between law enforcement authorities and the accused person or entity, with or without court approval. In some cases, the proceedings may have been terminated or deferred for a certain period of time on condition that the accused person agrees to certain conditions, such as implementation of corporate reforms, the payment of fines, restitution, and/or full co-operation in the investigation of others individuals or companies allegedly involved in the same case.
- **What is not included in the tables?** Unless otherwise indicated, the tables *do not include* other offences that might also apply to this form of conduct in certain circumstances, such as trading

<sup>1</sup> Only those countries that have reported administrative/civil sanctions for offences related to foreign bribery have been listed under Table 2B. "Other offences related to foreign bribery" include offences falling under Articles 7 (Money Laundering) and 8 (Accounting) of the Convention. Examples include books and records violations, failure to implement sufficient internal controls, *abus de biens sociaux* (misuse of company assets), and *Untreue* (breach of trust based on a failure to supervise).

<sup>2</sup> For the **United States**: This row records the number of administrative and civil enforcement actions of the US Department of Justice and the US Securities and Exchange Commission that have led to sanctions for violations of the books and records and internal controls provisions of the FCPA either alone or in conjunction with the FCPA's anti-bribery provisions. It includes sanctions imposed through court decisions, administrative orders, as well as other types of resolutions, including NPAs.

in influence, United Nations embargo violations, private-to-private bribery, or bribery to obtain a benefit outside of an international business transaction. They also do not record the number of sanctions that may have been imposed by the Parties against foreign public officials for receiving bribes, as this offence is not covered by the Convention.

**Tables 2A and 2B** present the enforcement data provided on a *voluntary* basis by Parties regarding sanctions in criminal, administrative, and civil cases for other offences related to foreign bribery. These include non-bribery offences that are covered by Articles 7 (Money Laundering) and 8 (Accounting) of the Convention. The specific offences vary by jurisdiction, but all relate to misconduct associated with foreign bribery in international business transactions, such as books and records violations, failure to implement internal controls, *abus de biens sociaux* (misuse of company assets), and breach of trust based on a failure to supervise. As with Tables 1A and 1B, this data set does *not cover* other offences that fall outside the Convention, such as trading in influence, United Nations embargo violations, or bribery to obtain a benefit outside of an international business transaction.

Supplementary information about the methodology used to collect the data on enforcement is available here: <https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/fighting-foreign-bribery/methodology-enforcement-data.pdf>

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