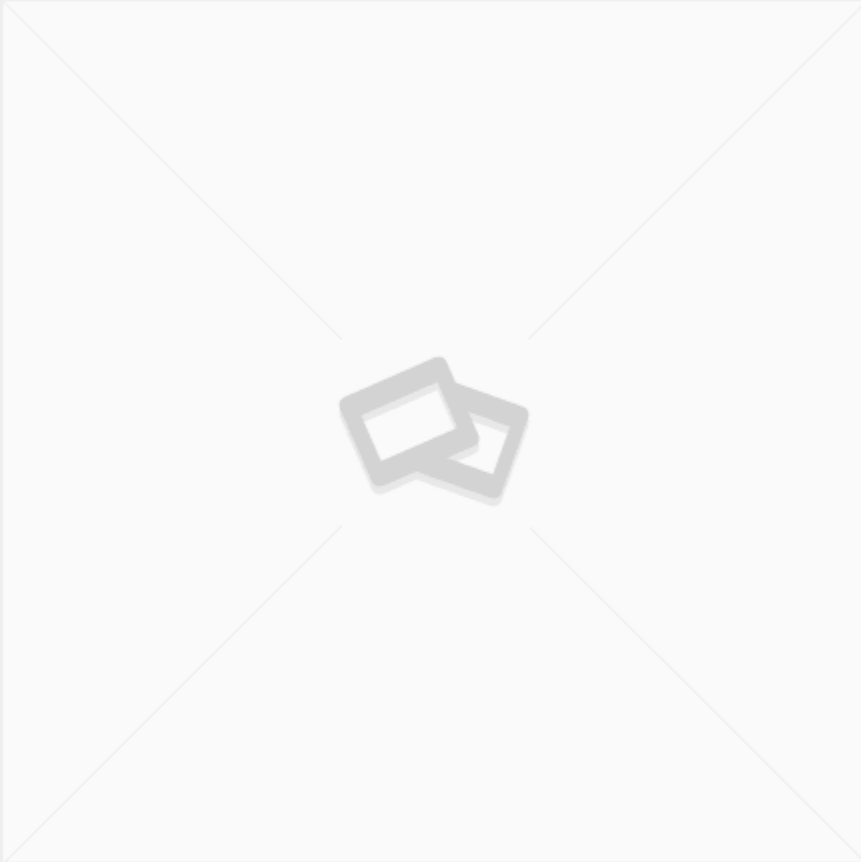


# COMPANIES NEED TO DEMONSTRATE EFFECTIVE PROCESSES TO COMPLY

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It is not enough for a company to consider complying and informing US investigators, there are now other countries with very proactive prosecutors. Currently, companies cannot only have compliance programmes, but need procedures to show that they can implement the policies, says John Pappalardo, partner and expert at Greenberg Traurig