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Cross-border White-collar Crime Legislations and Their Implications on Corporate Criminal Liability for Multinationals Operating in and out of Africa

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Introduction

Africa has continued to lead the ranks as the region with the highest rate of return on foreign investment.[1] The continent is not only fast in developing its commercial future, but since the turn of the 21st century, the rate of real GDP has risen at more than twice its pace in the 1980s and 1990s, thereby making the continent an attractive destination for some of the most reputable global companies to set up offices. However, operating in and out of Africa comes with its challenges because the continent is plagued with a myriad of issues such as corruption, conflicts, environmental pressures, and insecurity, all of which tend to expose global companies operating in Africa, to corporate criminal liability for vices such as bribery, corruption, influence peddling, money-laundering, conflict/terrorism financing, and all kinds of white-collar crimes.

Moreover, the risk and exposure to corporate criminal liability for the above-listed white-collar crimes is significantly higher for global companies operating in Africa but whose headquarters are in countries like Germany, the United Kingdom, the USA, France, and the European Union. This is because these companies are not only required to comply with local laws that deal with white-collar crimes within Africa, but they are much more required to ensure that their operations in Africa comply with, and are not in violation of laws, regulations, and transnational legislations that criminalize white-collar crimes in their jurisdictions.

This article attempts a brief examination of some of the legislations that criminalize corporate involvement in white-collar crimes in countries like Germany, the United Kingdom, the USA, France, and the European Union and discusses their implications on corporate criminal liability for multinational corporations operating in and out of Africa.

[1]Investment in Africa: Examining Africa's increased economic momentum, as soaring prices for oil, minerals, and other commodities have helped lift GDP since 2000 https://www.chathamhouse.org/topics/investment-africa

The Concept of Cross-Border White-Collar Crime, its Impact on Foreign Companies Operating in Africa and Challenges in its Investigation

White-collar crime has been defined by the United States Federal Bureau of Investigation (FBI) as 'those illegal acts which are characterized by deceit, concealment, or violation of trust and which are not dependent upon the application or threat of physical force or violence.[2]

Crimes of this nature become cross-border or international when they span multiple jurisdictions, leveraging the interconnected nature of the global financial systems to evade detection and enforcement efforts.[3] A common form of cross-border white-collar crime, prevalent with multi-jurisdictional business operations is the bribery of foreign corrupt officials by multinational corporations and their executives in exchange for being awarded contracts. A case in point is the Haliburton scandal, which led to a notable settlement with the Nigerian government and the conviction of Albert "Jack" Stanley, a U.S. citizen and a former officer and director of Kellogg, Brown & Root, Inc. ("KBR"), that was during part of the relevant period a subsidiary of Halliburton.

Similarly, investigations by the Department of Justice and the Securities and Exchange Commission (US), revealed that Siemens and its subsidiaries paid bribes totaling approximately $1.4 billion to foreign government officials in various countries globally. Upon pleading guilty Siemens and its subsidiaries paid a record $800 million in fines and penalties.

More recently, on 8th August 2024, the former Finance Minister of Mozambique, Mr. Manuel Chang, was found guilty and convicted by a Brooklyn Court, for his role in a $2 billion fraud, bribery, and money laundering scheme that victimized investors in the United States and elsewhere referred to as the Tuna Bonds case. Furthermore, following Credit Suisse AG and Credit Suisse Securities (Europe) Limited (CSSEL) admission of having defrauded investors in the US and elsewhere, Credit Suisse paid approximately $475 million in penalties, fines, and disgorgement as part of coordinated resolutions with criminal and civil authorities in the United States and the United Kingdom.[4]

Another story of great concern is the findings by South Africa's Judicial Inquiry into the alleged state capture by the Gupta Brothers, which impacted several foreign companies operating in South Africa, including Denton's for payments made to alleged money laundering vehicles operated by the Gupta Brothers.

Notwithstanding these laudable instances of combating the growth of cross-border white-collar crime, there are still inadequacies existing in collaboration by law enforcement agencies of sovereign nations, varying legislation of countries, and political factors that hinder the detection and prevention of these crimes.

[2] Federal Bureau of Investigations, White-Collar Crimes, https://www.fbi.gov/investigate/white-collar-crime, Accessed August 24th, 2024
[3] 'The Global Challenge of Cross-Border Financial Crimes: Strategies for International Cooperation and Enforcement' Accessed on 24th August, 2024.
[4] Former Finance Minister of Mozambique Convicted of $2B Fraud and Money Laundering Scheme. Accessed on 7th October, 2024

Again, with various countries adopting data privacy laws that protect personal and other important information, another barrier that has further complicated combating cross-border crimes is the transfer of information between multiple countries, with some jurisdictions restricting the cross-border transfer of information through "blocking statutes", which act to prevent the disclosure of data or other materials to foreign jurisdictions for legal proceedings, except when there is a treaty or agreement between the jurisdictions providing for such a transfer.[5]

This divergence in the legal framework of various countries further compounds the complexity of investigating cross-border financial crimes, which spells the need for improved international cooperation and transparency measures.

Legislations by Various Jurisdictions to Tackle Cross-Border White-Collar Crime

Given the ever-present need to safeguard the global economy and recognize the necessity to challenge the growth of cross-border white-collar crimes, several jurisdictions have promulgated legislations that aim at not only unraveling the complexities but also discouraging these crimes.

Cross-Border White-Collar Crime Legislations in the USA

In 1977, the United States of America enacted the Foreign Corrupt Practices Act (FCPA), which is considered today as one of the most effective cross-border anti-corruption laws in operation.

The FCPA is a federal law, enforced by the U.S. Department of Justice, which prohibits payments, gifts, or even offers of "anything of value" to a "foreign official" to influence the official or otherwise "secure any improper advantage" in obtaining, retaining or directing business.

A key strength of the FCPA is its worldwide application, and it applies to all US or foreign public companies listed on the stock exchange in the U.S. or companies that are required to file periodic reports with the U.S. Securities and Exchange Commission. The Act is also applicable to a company's employees, officers, stockholders, and agents such as third-party actors, distributors, and consultants.

Another notable development from the US, in 2023, Homeland Securities Investigations (HIS) **established the Cross-Border Financial Crime Center (CBFCC)** which is a public-private partnership of federal law enforcement agencies, partner nations, banks, financial institutions, and financial technology companies.[6] CBFCC is notable for supporting the prosecution, disruption, and dismantlement of transnational criminal organizations, strengthening the financial technology industries against illicit activity, and enhancing communication between government and private sector partners.

[5] Stéphane Eljarrat, Plamondon and Emily Lynch (December 2021) 'Navigating issues in cross-border investigations' Financier Worldwide Magazine
[6] Cross-Border Financial Crime Center (CBFCC)' Accessed August 23rd, 2024

A Bill to be cited as "Combating Cross-border Financial Crime Act of 2023" has also been introduced by U.S Senators, Sheldon Whitehouse, Bill Cassidy, and Angus King in November 2023 but it is yet to be passed into Law. The Bill is targeted at combating illicit cross-border financial activity and improving the Trade Transparency Unit program of U.S. Immigration and Customs Enforcement and other purposes.[7]

Currently, in the US, there are various Anti-Money Laundering Laws used in combating these white-collar crimes, such as:

1. **The Bank Secrecy Act (BSA) 1970** - This remains the country's most important anti-money laundering law. It was enacted to ensure that financial institutions in the US do not facilitate money laundering.

2. **USA Patriot Act 2001** - This Act criminalized the financing of terrorism and augmented the existing BSA framework by strengthening customer identification procedures. Also, it prohibits financial institutions from establishing, maintaining, administrating, or managing correspondent accounts for foreign shell banks.

3. **Anti-Money Laundering Act of 2020** - This amended and modernized the Bank Secrecy Act (BSA) for the first time since 2001. Aside from deterring money launders from using shell companies to evade detection, the Act also addresses emerging financial threats and encourages information sharing, coordination, and technological advancement.

Cross-Border White-Collar Crime Legislations in the United Kingdom

A series of financial scandals occurred in London during the 1970s and 1980s that caused the public to lose trust in how sophisticated frauds were handled. Deliberations on this issue necessitated the birth of the Special Fraud Office (SFO) in 1987, which became effective in April 1988.

SFO, established by the Criminal Justice Act, 1987,[9] is the non-ministerial government department saddled with the responsibility of investigating and prosecuting serious complex fraud and corruption in England, Wales, and Northern Ireland. SFO also enforces the Bribery Act 2010.

Under Section 2 of the Criminal Justice Act 1987, SFO is empowered to require any person (or business/bank) to provide any relevant documents (including confidential ones) and answer any relevant questions including ones about confidential matters. SFO which is headed by a director appointed by the Attorney General investigates and prosecutes different types of high-profile cases involving fraud.

The need to harmonize the existing white-collar crimes legislation and consolidate the criminal offenses about bribery in the UK and other countries led to the Bribery Act, of 2010. The Bribery Act, 2010 features an international outlook as it covers transactions that take place not only in the UK but also abroad in both the public and private sectors.

[7] https://www.congress.gov/118/bills/s3384/BILLS-118s3384is.xml Accessed August 23rd, 2024
[8] What are the US anti-money laundering laws?'. Accessed August 23rd, 2024
[9] Section 1(1) Criminal Justice Act, 1987

Section 6 of the Bribery Act is important as it criminalizes an attempt to influence a person acting in their capacity as a foreign public official by offering, promising, or giving a financial or other advantage to obtain or retain business or a business advantage.

It is still an offense if the offer, promise, or giving is made through a third party and/or where the offer, promise, or giving of a reward is to a third party at the foreign public official's request or agreement. Multinational companies headquartered in the UK are also advised to take note of salient provisions of the Bribery Act such as the potential liability for the acts of persons deemed to be associated with a commercial organization. If a person associated with a commercial organization bribes a person to obtain or retain business or a business advantage for the commercial organization, then the organization may be guilty of an offense under the Bribery Act and liable for an unlimited fine.[10]

The Bribery Act defines an associated person under Section 8 to be a person who performs services on behalf of the commercial organization and provides as an example an employee, agent, or subsidiary.

The provisions regarding corporate offenses are essentially strict liability, however, a defense to culpability is that the commercial organization has designed "adequate procedures" to prevent acts of bribery or official corruption by associated persons.

Moving forward, since the Bribery Act of 2010 mostly covers the offences relating to bribery, there was need for a legislation that will overhaul corporate criminal liability to improve transparency over UK companies and at the same time prevent fraudsters and terrorists from using corporate entities to exploit the UK's economy. This led to the promulgation of the Economic Crime and Corporate Transparency Act, of 2023 ("ECCTA").

The ECCTA was passed in October 2023, to strengthen the existing framework for tackling financial crimes, featuring notable changes to widen the net of corporate criminal liability. The provisions of the ECCTA are targeted at enhancing corporate governance and accountability, which is crucial to maintaining the integrity of the global economy.

The ECCTA introduced a new test for corporate criminal liability. Before the ECCTA the identification doctrine developed through case law required that for a corporate entity to be criminally liable for a financial crime, the natural persons committing the crime must be the directing mind and will of the company, who also possessed the necessary mens rea to commit the offense.

In essence, to prove criminal culpability, investigators had the herculean task of identifying a natural person who was senior enough to be the directing mind and will of the company. The difficulty with this approach in dealing with multinational companies is that the "directing mind" of the organizations is usually far removed from the day-to-day activities of the corporate entities so corporate criminal liability could be avoided.

[10] See Section 7 and 11 of the Bribery Act, 2010

Now, with the promulgation of the ECCTA, a company will be criminally liable for the actions of persons considered senior managers, effectively lowering the threshold for corporate criminal liability and ensuring that corporate entities themselves are fully involved in tackling financial crimes. The definition of senior managers covers natural persons who make decisions or manage a whole or substantial part of the organization's activities. This not only covers members of the board but also heads of departments.

The ECCTA also introduced a new corporate offense of the Failure to Prevent Fraud, an expansion on what was applicable under the Bribery Acts under the failure to prevent offense. The ECCTA provides that a large organization would be criminally liable where a person associated with the organization ("Associated Person") commits a fraud offense for the benefit of the organization, or for the benefit of someone for whom the organization provides service.

The ECCTA applies to organizations that meet at least two of three thresholds, which are a turnover of more than £36 million, a balance sheet total of more than £18 million, and an average of more than 250 employees. It is important to note that the applicability of the ECCTA extends beyond the UK and includes multinationals that do not have a subsidiary or operate in the UK. If an employee or agent commits or attempts to commit fraud against UK citizens, the corporation could be found liable for their actions.

Cross-Border White-Collar Crime Legislations in France

Over the years, the French practices of white-collar crimes have evolved, given the globalization of French companies. This necessitated the promulgation of Sapin II Law, the French Law on the protection of whistleblowers in public and private sectors, passed into law in December 2016 and came into effect on 1st January 2018.[11] Sapin II indeed has strengthened the French legal framework for combating bribery and corruption through its notable provisions.

The Sapin II Act features key provisions designed to ensure that multinational corporations headquartered in France, establish internal control mechanisms that work to prevent corruption. The Act established the French Anti-Corruption Agency (AFA), which is responsible for ensuring that companies put in place effective anti-corruption compliance programs. The Agency is also empowered to monitor and implement the provisions of the Act.

Going further, the Act mandates companies based in France with at least 500 employees or a group of companies that employs at least 500 employees worldwide and revenue of more than 100 million euros but whose parent company is headquartered in France, to establish and implement anti-corruption program. Failure to comply with the requirements of the Sapin II Act can result in penalties of up to 30% of average revenues, calculated over the last three fiscal years, and the company can be placed under mandatory compliance

[11] https://www.safecall.co.uk/whistleblowing-legislation/sapin-ii-definition/#:~:text=SAPIN%20II%20is%20the%20French,the%20private%20sector%20as%20well. Accessed on August 23rd, 2024

supervision for a maximum of three (3) years.

The Act also places various responsibilities on persons defined as senior management within the ranks of the company, with the primary task being to take measures to prevent and detect acts of bribery or influence peddling committed in France or abroad by the provisions of the Act.

Multinational companies are to establish a code of conduct that defines and illustrates the various proscribed conduct that could constitute bribery or influence peddling. This code of conduct is applicable everywhere the company does business, including in other countries. For its business operations in other countries, the code of conduct would take cognizance of local laws.

Cross-Border White-Collar Crime; Trends and Development in Germany

There are a variety of white-collar and regulatory enforcement challenges faced by companies in Germany, as white-collar crime policies are updated regularly. It is therefore pertinent to always search for trends and recent developments.

Notably, legal entities cannot directly be held liable for crimes in Germany. Unfortunately, the **draft Corporate Sanctions Act (Verbandssanktionengesetz – VerSanG)**, which sought to introduce a quasi-corporate criminal liability failed to pass into law. However, under the **German Administrative Offence Act (Gesetz über Ordnungswidrigkeiten – OWiG)** companies may be subject to corporate fines for criminal or administrative offenses committed by their "representatives" – eg, board members or representatives with supervisory functions, such as a company's compliance officer.[12] The scope of corporate administrative liability also extends extraterritorially, as in the instance where the offense committed by the representative of the company is punishable under German law, such as private or public corruption.

Proceeding from the above, similar to the "failure to prevent offenses" found in the legislation of other European countries, Section 130 of the German Administrative Offence Act makes it a regulatory offense where the owner of an operation or undertaking, intentionally or negligently omits to take the supervisory measures required to prevent contraventions, within the operation or undertaking, in a case where such contravention has been committed as would have been prevented, or made much more difficult, if there had been proper supervision.

Now, in Germany, a major strategic factor available for companies is to co-operate with law enforcement and regulatory authorities as this can lead to a discontinuation of an investigation and/or a significant reduction of a fine. However, whilst this cooperation is possible, there are no express guidelines in place.

Another trend in Germany as it concerns the combating of cross-border white-collar crimes, is the traction that Environment, Social, and Government (ESG) issues have garnered in recent times. Following this, the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz –

[12] Section 30 German Act on Regulatory Offences; Ordnungswidrigkeitengesetz – OWiG

LkSG) came into force on 1st January 2023. The Act contains mandatory requirements for German companies as well as foreign companies with German branches ("Affected Companies"). It provides obligations regarding human rights-related and environment-related due diligence obligations in the supply chains of Affected Companies.

From January 2024 organizations with more than 1,000 employees, are mandated to comply with an expansive set of due diligence obligations[13] ranging from initial risk assessments to third-party due diligence and reporting requirements. Failure to comply with this law can lead to the payment of fines, of up to 2% of a company's average annual turnover.

Cross-Border White-Collar Crime Legislations in the European Union

The Directive (EU) 2017/1371 on the fight against fraud to the Union's financial interests using criminal law (PIF Directive) was adopted as part of the expansive strategy adopted by the European Parliament to combat fraud and improve the prosecution and sanctioning of crimes against the EU budget. The Directive aims to set common definitions and standards for member states to take the necessary measures to ensure that passive and active corruption, when committed intentionally, constitute criminal offenses.

The Directive defines 'passive corruption' as the action of a public official who, directly or through an intermediary, requests or receives advantages of any kind, for himself or a third party, or accepts a promise of such an advantage, to act or to refrain from acting by his duty or the exercise of his functions in a way which damages or is likely to damage the Union's financial interests.

'Active corruption' is the action of a person who promises, offers, or gives, directly or through an intermediary, an advantage of any kind to a public official for himself or for a third party for him to act or to refrain from acting by his duty or the exercise of his functions in a way which damages or is likely to damage the Union's financial interests.

The required extraterritorial effect of the provisions of the Directive is apparent from the definition of a public official being a Union official or a national official, including any national official of another Member State and **any national official of a third country**. Again, Article 11, point b of paragraph 3, envisages as part of a member state jurisdiction where the criminal offense is committed for the benefit of a legal person established in the member state territory.

According to the Directive, member states are required to put in place sanctions to dissuade the commission of the offenses noted in the Directive, notably, for criminal offenses in Article 4 such as 'passive' and 'active' corruption, Article 7 states that Member states shall take necessary measures to ensure that they are punishable by a maximum penalty of at least four years of imprisonment when they involve considerable damage or advantage.

[13] 'German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG)' Accessed August 24th, 2024

The Directive on corporate sustainability due diligence (Directive 2024/1760) entered into force on 25th July 2024, to foster sustainable and responsible corporate behavior in companies' operations and across their global value chains. The new rules are set to ensure that companies in scope identify and address adverse human rights and environmental impacts of their actions inside and outside Europe.[14] Member States have until 26 July 2026 to transpose CS3D into national law, and it will then be implemented over two years from July 2027.

While these rules are set to protect the human rights of citizens, ensure a healthy environment for working, boost trust in workplaces, and enable them to make informed decisions, etc., they also harmonize the legal framework in the EU, creating legal certainty and level playing field, creating better awareness of the negative impact of adverse human rights and environmental activities. They also increase attractiveness for talent, sustainability-oriented investors, and public procurers.

These EU rules will apply to large EU limited liability companies and partnerships with more than 1000 employees and more than EUR 450 million turnover (net) worldwide; and to large non-EU companies with more than EUR 450 million turnover (net) in the EU. The rules also provide further thresholds for its applicability to both EU and non-EU entities.[15] Micro companies and SMEs are therefore not covered by the proposed rules, although the Directive provides supporting and protective measures for SMEs, which could be indirectly affected as business partners in value chains.

Consequences for failure to comply include fines of up to 5% of net worldwide turnover, public 'naming and shaming', and potential claims for damages from impacted individuals.[16]

The Implications of These Cross-Border White-Collar Crime Legislations in Africa

The continuous development of the global market is a blessing to many countries as the interaction between the economies of various states not only facilitates the exchange of goods and services but many other benefits, especially for under-developed and developing nations in Africa. The global economy also provides an avenue for more developed nations to consider investments in emerging markets, thereby strengthening their economies and generating revenue for internal development projects.

Among private individuals and organizations, access to a global economy means access to more customers, growth in profit, and stock prices. However, the benefit of the global market is not lost on criminal actors, who will seize the opportunities provided by the interplay of economies to proliferate their criminal activities, whilst hiding behind corporate structures.

[14] 'Corporate sustainability due diligence' Accessed August 24th, 2024
[15] Article 2 of Directive 2024/1760.
[16] 'ESG – impact of the EU Corporate Sustainability Due Diligence Directive on UK companies' Accessed August 24th, 2024

Now, at the core of most of the legislations examined, a reoccurring theme is the requirement of active steps by organizations undertaking business in multiple jurisdictions either by way of subsidiary entities or business partners to establish internal procedures that will dissuade the use of the corporate entity to commit acts such as fraud, bribery, and corruption.

Some jurisdictions in Africa like Mozambique, Nigeria, and the rest have been plagued by high levels of fraud, official corruption, embezzlement, and money laundering. Therefore, businesses headquartered outside Nigeria or Africa in any of the jurisdictions examined must ensure that adequate measures are in place to prevent culpability for actions undertaken by their subsidiaries or third-party service providers.

Even more stringent are the ESG requirements, put in place to combat human rights abuses in the workplace, environmental degradation, child labor, and human trafficking, with the intent being to ensure that multinational entities become watchdogs by not only undertaking steps internally to ensure compliance but requiring large organizations to undertake due diligence on their much smaller partners.

On the other spectrum businesses established outside the UK including Nigerian businesses, that operate within the UK or have dealings with persons UK either directly or indirectly may be held liable for economic crimes under the new corporate criminal liability provisions of the ECCTA in the United Kingdom.

More so, the Directive on Corporate Sustainability due diligence (Directive 2024/1760) applies to non-EU companies too which means Nigeria and other African countries will be affected. This therefore adds to the complexities of regulations that African companies carrying on business or dealing with companies established in the EU may need to comply with. They are required to address adverse human rights and environmental impacts of their actions inside and outside Europe as failure to do so will cost them 5% of their annual turnover.

Recommendations for Multinationals Operating in and out of Africa

- Set up compliance teams in regions or countries of operation with direct reporting lines to a central compliance team located at the headquarters of the company and aided by experienced external compliance professionals.
- Adoption of a whistleblowing policy to engender anonymous reports and tip-offs of actions being carried out in contravention of company standards and policies.
- Conduct regular training for employees, directors, officers, and third-party agents on developments in anti-crime laws, human rights protection, data protection, environmentally friendly initiatives, international policies, reporting procedures, guidance on how to handle government officials who require bribes for undertaking processes and examine real-life scenarios.
- Conduct an annual risk assessment to enable a continuous update on potential risks associated with the region of operation, this may include the impact of change in government, change in national policies, and enforcement actions of law enforcement agencies.
- Undertake regular training initiatives to keep senior management abreast of changing trends in corporate compliance, global and local data protection standards, human right requirements, climate change; new technology and its impact on money laundering, terrorism financing; and risk management trends.
- Design procedures for undertaking thorough internal investigations, receiving information from employees, managing and keeping information of all persons having connections to the company, and disciplinary measures where misconduct or a crime is detected.
- Undertake risk assessment exercises to determine their exposures and any operational risks arising from the deficiencies in the subject country's AML/CFT/P framework.
- Establish specific, measurable, and time-bound goals across environmental, social, and governance aspects. This includes targets for reducing environmental impact, improving social responsibility, and enhancing governance practices.
- Carry out due diligence exercises adopting both local and foreign standards to confirm the Know Your Customer (KYC) of all counterparties in the country including beneficial ownerships of existing business relations and counterparties.
- Ensure compliance with regulatory reporting standards, including ESG Reporting, and reporting requirements under the country's AML/CFT/P framework.

Conclusion

African countries are increasingly becoming the choice destination for foreign investors, with this trend being driven by various factors including the continent's abundance of natural resources, growing consumer market, and improving business environment. Multinational companies looking to invest in Africa need to be well informed of local white-collar crime legislation and those of the referenced jurisdictions to avoid corporate criminal liability and sanctions.

Also, multinationals with nexus in the above-referenced jurisdictions should take the extra step of implementing preventive measures and regularly conducting risk assessments, which will go a long way in saving them the hassles of paying the inherent grave penalties for non-compliance. Simply put, multinationals must understand the various risks associated with carrying on business in a jurisdiction, as history has taught us that offering a cup of tea to a country’s minister may remarkably be considered a bribe.

Additionally, even if a foreign company operating in Africa is not headquartered in any of the referenced nations, the company may still be sanctioned by these nations and prohibited from partaking in public tenders for development projects in Africa sponsored by these nations if the actions of the foreign company violate the ESG and white-collar crime laws and regulations of the nations.

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Stren & Blan Partners is a full-service commercial Law Firm that provides legal services to diverse local and multinational corporations. We have developed a clear vision for anticipating our client's business needs and surpassing their expectations, and we do this with an uncompromising commitment to Client service and legal excellence.

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