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The New International Anti-Corruption Prosecutorial Taskforce

On March 20, 2025, the United Kingdom's Serious Fraud Office (SFO), France's Parquet National Financier (PNF) and Switzerland's Office of the Attorney General (OAG) announced the creation of the International Anti-Corruption Prosecutorial Taskforce (the "Taskforce").¹ The Taskforce aims to leverage the wide-reaching transnational anti-bribery legislation of each participating nation, which allows for the prosecution of criminal conduct occurring overseas if there is a connection to the prosecuting country. As described in its founding statement, the Taskforce is intended to strengthen existing ties, increase collaboration, and promote the sharing of insights and expertise.² Through the Taskforce, the three countries will establish a "Leaders' Group" to exchange "insight and strategy" and a "Working Group" to "devis[e] proposals for co-operation on cases."³ The Taskforce also will invite "other like-minded agencies" to join and share best practices.⁴

Jean-François Bohnert, Head of the PNF, noted that the Taskforce "will definitely strengthen our current cooperation in order to fight more efficiently against bribery and corruption in individual cases."⁵ Nick Ephgrave, Director of the SFO, added that the Taskforce "will make use of every power and partnership available to confront . . . the pernicious threat of international bribery and corruption, wherever it occurs."⁶

A Changing International Context

The creation of the Taskforce comes at a time of transition for U.S. foreign enforcement. Less than two months ago, U.S. Attorney General Pamela Bondi instructed DOJ's Foreign Corrupt Practices Act ("FCPA") Unit to prioritize foreign bribery investigations and prosecutions with a nexus to cartels and transnational criminal organizations.⁷ Less than a week later, President Trump issued an Executive Order directing DOJ to pause FCPA enforcement altogether for at least 180 days, empowering the Attorney General to review existing FCPA investigations and enforcement actions, and directing the Attorney

¹ Serious Fraud Office, "UK, France and Switzerland announce new anti-corruption alliance," GOV.UK, Mar. 20, 2025, <https://www.gov.uk/government/news/uk-france-and-switzerland-announce-new-anti-corruption-alliance>; see also "Actualités mensuelles - Parquet national financier," Ministère de la Justice, Mar. 20, 2025, <https://www.tribunal-de-paris.justice.fr/75/actualites-mensuelles-parquet-national-financier>; "UK, France and Switzerland announce new alliance to tackle bribery and corruption threat," Office of the Attorney General of Switzerland, Mar. 20, 2025, https://www.bundesanwaltschaft.ch/mpc/en/home/medien/archiv-medienmitteilungen/nsb_medienmitteilungen.msg-id-104571.html.

² International Anti-Corruption Prosecutorial Taskforce, "Founding Statement," Mar. 20, 2025, https://assets.publishing.service.gov.uk/media/67dc0bb3931ea30d1b7ee33d/International_Anti-Corruption_Prosecutorial_Taskforce.pdf.

³ *Id.*

⁴ *Id.*

⁵ Serious Fraud Office, "UK, France and Switzerland announce new anti-corruption alliance."

⁶ *Id.*

⁷ Loretta Lynch, John Carlin, and Mark Mendelsohn, "Bondi Memos, FCPA Shift Require Compliance Review, Not Pull-Back," Bloomberg, Feb. 12, 2025, <https://news.bloomberglaw.com/us-law-week/bondi-memos-fcpa-shift-require-compliance-review-not-pull-back>.

General to prepare new FCPA enforcement guidelines consistent with the Administration's priorities.⁸ Though Director Ephgrave stated the Taskforce "is in no way a reaction" to the American pause on FCPA enforcement,⁹ the timing of the creation of the Taskforce may suggest that European authorities perceive a shift in U.S. enforcement priorities.

The Taskforce's creation represents an additional step in the coordination of international anti-corruption enforcement. While the Head of the PNF, Jean-François Bohnert, noted at the Taskforce's inauguration that, the PNF, SFO and OAG have "ten years of operational cooperation,"¹⁰ prior collaborations generally reflected one-off prosecutions, often with the U.S. as a key participant. For example, in 2018, the U.S. and France, with assistance from British and Swiss anti-corruption authorities, secured a nearly \$1 billion resolution from Société Générale for a scheme to bribe Libyan officials.¹¹ Similarly, in 2020, British and French authorities worked closely to investigate and fine Airbus €3.6 billion for allegations of bribery and corruption.¹² Most recently, in 2024, British and French authorities began investigating Thales, a British defense firm, on bribery and corruption charges.¹³ Despite the success of these collaborative efforts, they generally arose in an *ad hoc* fashion, were not necessarily the result of a sustained coordination strategy, and regularly involved U.S. authorities. Similarly, Joint Investigative Teams ("JITs") of law enforcement and judicial authorities—an increasingly popular feature of EU member states' enforcement actions—are established only for "a specific purpose and for a limited period,"¹⁴ not regular and permanent vehicles for cooperation and coordination.

This dynamic may change with the creation of the Taskforce. The stated commitment to a "regular exchange of insight and strategy" and the desire to "devis[e] proposals for co-operation on cases" suggests a more proactive, deliberate and strategic approach to international anti-corruption efforts.¹⁵ A coordinated approach could build on (or replace) previous western and European collaboration efforts in this area, such as JITs, Eurojust coordination meetings and centers,¹⁶ and the OECD Working Group on Bribery's biannual informal meeting of law enforcement officials.¹⁷

⁸ *Id.*; see also "Trump EO Pauses FCPA Enforcement After DOJ Day-One Directives Announce Significant Shift in Priorities, Including the Reorientation of FCPA, FARA and Money Laundering Enforcement," Paul, Weiss, Rifkind, Wharton & Garrison, LLP, Feb. 13, 2025, <https://www.paulweiss.com/practices/litigation/anti-corruption-fcpa/publications/trump-executive-order-pauses-fcpa-enforcement-after-doj-day-one-directives-announce-significant-shift-in-priorities?id=56513>.

⁹ Ana de Liz, "UK, French, Swiss agencies set up new anti-corruption taskforce," Global Investigation Review, Mar. 20, 2025, <https://globalinvestigationsreview.com/article/uk-french-swiss-white-collar-agencies-set-new-anti-corruption-task-force>.

¹⁰ Serious Fraud Office, "UK, France and Switzerland announce new anti-corruption alliance."

¹¹ "Société Générale and Legg Mason to Pay Nearly \$650 Million to Resolve DOJ Investigation of Libyan Bribery Scheme," Paul, Weiss, Rifkind, Wharton & Garrison, LLP, June 7, 2018, https://www.paulweiss.com/practices/litigation/anti-corruption-fcpa/publications/soci%C3%A9t%C3%A9-G%C3%A9n%C3%A9rale-and-legg-mason-to-pay-nearly-650-million-to-resolve-doj-investigation-of-libyan-bribery-scheme?id=26555#_ftn17.

¹² Aziz Rahman, "Airbus, international cooperation and the rise of Deferred Prosecution Agreements," International Bar Association, <https://www.ibanet.org/article/4835DC62-76DB-46EF-A7ED-E78FA02F4826>.

¹³ Serious Fraud Office, "SFO announces bribery investigation into defence firm," GOV.UK, Nov. 21, 2024, <https://www.gov.uk/government/news/sfo-announces-bribery-investigation-into-defence-firm>.

¹⁴ Europol, "Joint Investigation Teams – JITs," <https://www.europol.europa.eu/partners-collaboration/joint-investigation-teams>.

¹⁵ See International Anti-Corruption Prosecutorial Taskforce, "Founding Statement," at *supra* note 2.

¹⁶ Eurojust provides support services to European countries fighting crime, including through hosting coordination meetings in cases of cross-border crime. While non-European Union countries like Switzerland and the United Kingdom may participate by invitation, Eurojust has a larger and different member composition, and broader judicial coordination mandate than the Taskforce. "Who we are," European Union Agency for Criminal Justice Cooperation, <https://www.eurojust.europa.eu/about-us/who-we-are>.

¹⁷ Since 1997, the OECD Working Group on Bribery has led global efforts to fight bribery of foreign public officials in international trade and investment under the framework of the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. Its key activities include its peer review and monitoring mechanisms, its Tour de Table case review process, and its sponsorship of biannual meetings of law enforcement officials on the margins of the Working Group's quarterly meetings. This body is expected to play a continuing, central role, but its size and structure is not well-designed for intense, small group, case-specific law enforcement coordination. See "Working Group on

Implications for Companies

The creation of the Taskforce should serve as a reminder to international companies that anti-corruption enforcement remains a top priority internationally, despite the FCPA pause. Companies with operations, clients or footprints in the U.K., France or Switzerland could be exposed to coordinated investigations by this new Taskforce. Potential expansion to include other “like-minded agencies” can also expand the Taskforce’s jurisdictional reach. Therefore, companies should remain vigilant in maintaining and improving their corporate governance and anti-bribery and anti-corruption compliance programs and practices.

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Bribery,” Organisation for Economic Co-operation and Development, <https://www.oecd.org/en/about/committees/working-group-on-bribery.html>**Error! Hyperlink reference not valid.** One additional limitation is the potential, longer term absence of the DOJ from the U.S. delegation to the OECD Working Group on Bribery, which is headed by the State Department and also traditionally comprised of DOJ, SEC, and Commerce Department officials. The DOJ did not attend the Working Group’s most recent meeting in March 2025. Gaspard Le Dem, “DOJ will be a no-show at OECD anti-bribery meetings,” Global Investigations Review, Mar. 10, 2025, <https://globalinvestigationsreview.com/just-anti-corruption/article/doj-will-be-no-show-oecd-anti-bribery-meetings>.

This memorandum is not intended to provide legal advice, and no legal or business decision should be based on its content. Questions concerning issues addressed in this memorandum should be directed to:

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