

# 2024 Latin America Corruption Survey

Miller & Chevalier

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Brigard  
Urrutia

BF BUSTAMANTE  
FABARA

C|P|B  
ABOGADOS

DEMAREST

FERRERE

GARCIA & BODAN  
Attorneys & Counselors at Law

HEADRICK  
HEADRICK RISK JAVIEREZ & FERRANDES  
ABOGADOS | ATTORNEYS

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VON WOBESER

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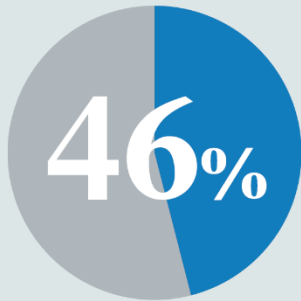
## EXECUTIVE SUMMARY

Our 2024 Latin America Corruption Survey, developed in partnership with leading law firms throughout the region, distills insights from more than 1,000 professionals throughout Latin America and the United States and builds on findings from our surveys in [2008](#), [2012](#), [2016](#), and [2020](#). Respondents represent numerous industries and types of companies, from publicly traded multinational corporations to local and regional companies, and include lawyers, risk directors, compliance officers, and a range of other senior executives.

Overall, the survey reveals that corruption in the region remains pervasive and that corporate compliance, not enforcement, has been the key driver for addressing it. More companies are adopting increasingly nuanced compliance strategies: for the first time since the 2008 survey, a significant percentage of organizations report having third party due diligence policies, anonymous reporting mechanisms, full-time compliance personnel, anti-corruption audits and assessments, and compliance procedures in place for charitable and community donations, political contributions, facilitating payments, and merger and acquisition (M&A) due diligence. Countries with the most substantive compliance incentives embedded in local laws have seen positive changes with companies in those countries addressing corruption risks through increased compliance efforts.

On the enforcement side, the survey reveals a disconnect between awareness of corruption prosecutions (75% of respondents regionwide say they are aware) and perceived effectiveness of local anti-corruption laws in the countries where respondents work (only 40% say laws are effective to a moderate or significant extent). Respondents appear to be recognizing government efforts, including legal reform and high-profile investigations, to address corruption. At the same time, they might see enforcement as a set of isolated events and not sufficiently systemic to mitigate the specific corruption risks their companies face. These gaps in local enforcement further highlight the importance of corporate compliance programs in many countries.

Notably, for the first time, sample sizes from El Salvador and Nicaragua were so low that they were not statistically significant, suggesting that corruption and retaliation against government critics may be so endemic that business leaders there see little upside to participating in our survey. The 2020 survey received responses from these jurisdictions, suggesting the situation is getting worse, not better.



**SAY CORRUPTION IS A SIGNIFICANT OBSTACLE TO DOING BUSINESS**



**41%** BELIEVE THEIR COMPANIES HAVE LOST BUSINESS TO COMPETITORS THAT MAKE ILLICIT PAYMENTS



**27%** SAY THE FCPA OR OTHER ANTI-CORRUPTION LAWS SIGNIFICANTLY MITIGATE CORRUPTION RISK

**8** *in* **10**



**SAY THEIR COMPANIES TAKE STEPS TO MITIGATE CORRUPTION RISKS**

**6** *in* **10**



**BELIEVE THEIR COMPANIES WILL INCREASE CORRUPTION PREVENTION EFFORTS IN THE NEXT YEAR**

***Most corrupt for doing business***

***Least corrupt for doing business***



**VENEZUELA**

**NICARAGUA**

**BOLIVIA**



**UNITED STATES**

**URUGUAY**

**CHILE**



## REGIONWIDE KEY FINDINGS

### Corruption remains entrenched throughout Latin America.

The perception of widespread corruption is solidly embedded among businesses operating in Latin America, despite the burst of enforcement efforts during the 2010s (e.g., *Lava Jato* in Brazil) and new anti-corruption laws and incentives for compliance programs that have been adopted in key jurisdictions over the past decade.

Nearly half of all respondents say that corruption is a “significant obstacle” to doing business, a response level that has remained mostly static since 2012. Overall, more than four in 10 respondents (41%) regionwide — and a majority in over half the countries surveyed — believe their companies have lost business to competitors that have made illicit payments.

To some, this result might not come as a surprise. When corruption is so entrenched and influence peddling is perceived as a necessary way of doing business, it will take time for legal and enforcement regimes to mitigate the historical tendency of business executives and government officials to engage in improper conduct. At the same time, one would expect (and hope) that sustained efforts to criminalize, investigate, and prosecute such conduct could create a deterrent effect.

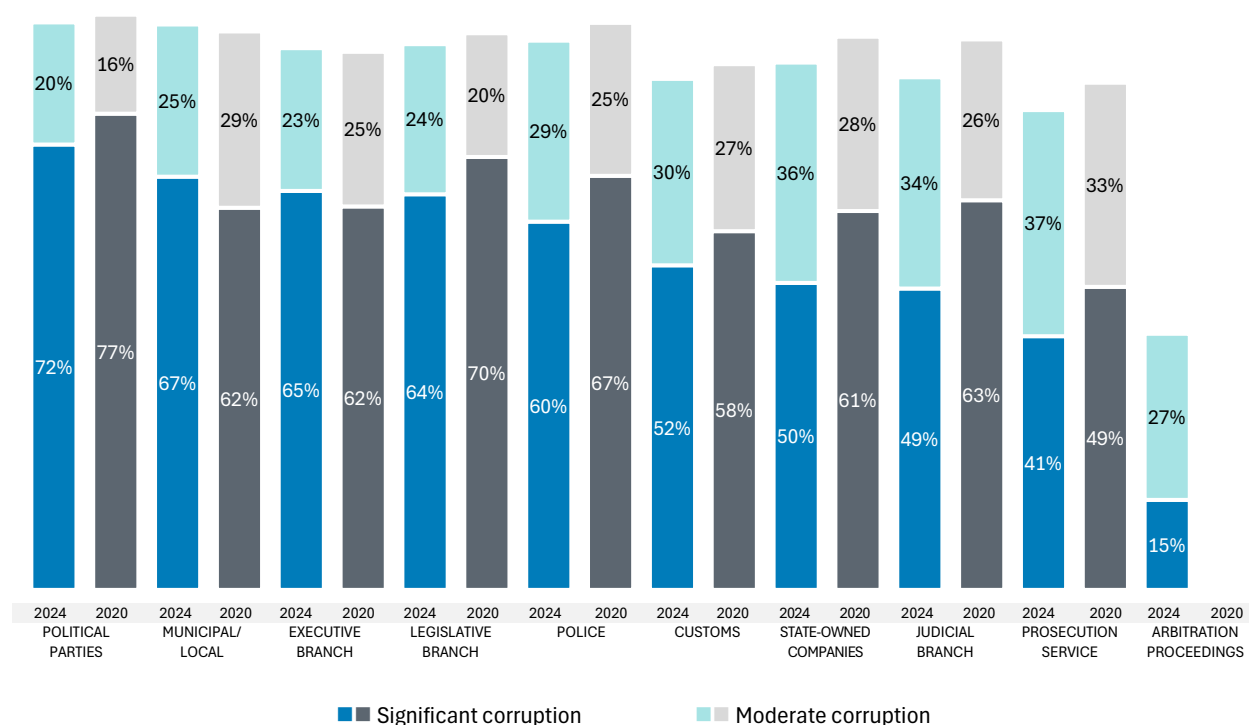
The data also suggests slight movement in a positive direction. The percentage of respondents who think their companies have lost business due to corruption has steadily decreased over the years: 60% in 2008, 52% in 2016, 47% in 2020, and 41% in 2024.

### Respondents rank political parties and municipal/local governments as the most corrupt areas in the countries where they work.

For political parties, this is relatively consistent with responses in 2020, where 77% of respondents ranked them as significantly corrupt (compared to 72% in 2024). These findings should come as little surprise as dysfunction and instability in government institutions (a common trait in some Latin American countries) can enhance the power of political parties and, in turn, opportunities for related corruption.

The level of significant corruption perceived in municipal/local governments also saw a five-percentage point increase (up from 62% in 2020 to 67% in 2024), followed closely by the executive branch (65%) and legislative branch (64%). The close ranking of municipal/local with the executive and legislative branches is surprising given that national government institutions are typically subject to more controls, such as national anti-corruption laws and transparency initiatives for public procurement. When it comes to the police, perceived corruption levels (60%) have remained relatively consistent with prior surveys.

### Extent of Corruption



When considering government dispute resolution and prosecutorial mechanisms, 49% of respondents perceive significant corruption in the judiciary and 41% say as much for prosecution services or investigators. This is contrasted with arbitration proceedings, which are viewed as the least corrupt area, with only 15% citing significant corruption, perhaps given the significant involvement of market and private sector actors in these proceedings.

**There are some positive signs for local anti-corruption enforcement.**

Regionwide, anti-corruption laws are perceived as more effective now than they were four years ago: 40% of respondents say such measures are effective in the country where they work to either a moderate (30%) or significant (10%) extent — up 10 percentage points from 2020. Only 26% believe they are not effective at all, versus 37% in 2020.

There is also more regionwide awareness of prosecutions. Three-quarters of all respondents (75%) report awareness of prosecutions of individuals, companies, or government officials for making or receiving improper benefits, up from 64% in 2020 and about the same as in 2016. Over half of respondents believe that an offender is likely to be prosecuted, returning to pre-2020 levels.

But while respondents tend to have growing awareness of prosecutions, this does not necessarily mean they think enforcement regimes capable of mitigating the corruption risks facing them specifically. Consistent with responses since 2012, more than 80% of respondents say they did not report to authorities when they lost business due to corruption. And as in 2020, the top reasons for

not reporting to authorities are lack of trust in the judicial branch (54%, compared to 56% in 2020) and lack of trust in prosecution services or investigators (52%, same as 2020).

### **The impact of strengthened anti-bribery laws is still uncertain.**

Latin America has experienced a wave of new and stronger anti-corruption laws over the last 10 years. Eight key jurisdictions (Argentina, Brazil, Chile, Colombia, Costa Rica, Ecuador, Mexico, and Peru) have enhanced their anti-corruption laws during that time, introducing corporate criminal or administrative liability for corruption offenses and incentivizing companies to have adequate compliance mechanisms in place.

For the most part, these countries are showing better or stable numbers when their respondents are asked whether they think an offender is likely to be prosecuted. Brazil and Peru are notable exceptions and commentary below offers theories as to why.

At the same time, in only two of eight countries that have strengthened their laws (Colombia and Chile) do we see a positive change in perceptions of effectiveness of anti-corruption laws, and only Chile seems to have established a credible legal and enforcement regime. Even then, with the exception of Argentina, countries that have adopted stronger laws still tend to fare better in this area than others: respondents from Brazil, Costa Rica, Ecuador, Mexico, and Peru still, on average, see their anti-corruption laws as more effective than those of other countries in the region.

It is not clear how stable these results are. When asked to what extent enforcement of the U.S. Foreign Corrupt Practices Act (FCPA) or other anti-corruption laws has helped mitigate the risk of corruption, all countries that have strengthened their laws (except Mexico) have fewer respondents in 2024 reporting that corruption risk is mitigated “to a moderate or significant degree” than in 2020.

### **Addressing corruption has remained a top priority for companies over the last 15 years.**

Despite the risks outlined above, or perhaps because of them, 80% of respondents say their companies’ management has taken steps to protect the company from corruption risk. This response remains consistent with the findings in our 2020 survey.

When asked where dealing with corruption risk ranks within their companies’ priorities, responses are also almost the same as 2020, with 56% of respondents regionwide stating it is a top priority. In fact, in every survey since 2008, between 55% and 58% of respondents have considered dealing with corruption risk to be a top priority.

### **More companies are embracing nuanced compliance program elements.**

As in years past, most respondents (nearly 80%) say that basic compliance program elements exist at their companies, in particular anti-corruption policies, contract terms, training, and procedures for gifts, travel, and entertainment (GTE).

Yet for the first time, a second category of compliance program elements has emerged as standard in the region, representing notable progress. A significant percentage of respondents now report that their companies have procedures for charitable and community donations, political contributions, and facilitating payments, as well as third-party due diligence policies, anonymous reporting mechanisms, full-time compliance personnel, anti-corruption audits and assessments, and M&A due diligence. These elements are now being implemented by 65-75% of companies regionwide, compared to only 40-64% in 2020 and similarly low numbers in prior surveys.

Slow and steady focus on corporate compliance is also detected when respondents were asked if the importance of preventing corruption has increased over the last five years. About 65% of respondents regionwide answered in the affirmative.



## COUNTRY-SPECIFIC FINDINGS

### ARGENTINA

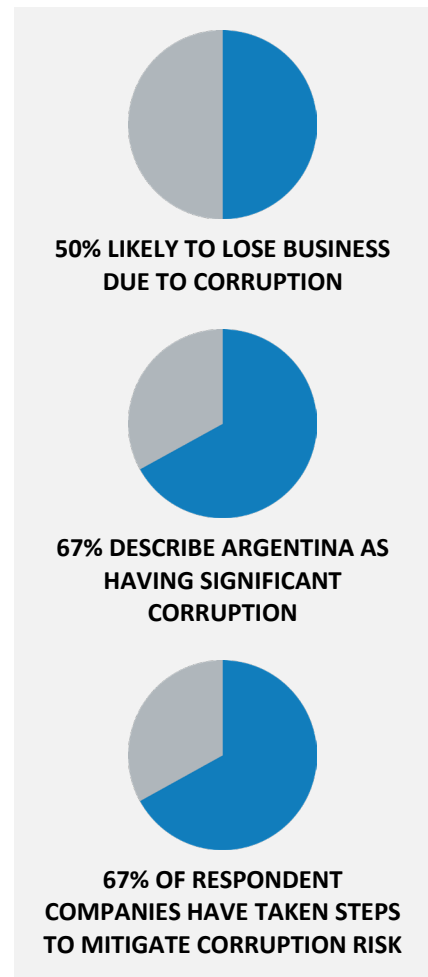
**Argentina continues to be a paradox when it comes to corruption risk and compliance.**

Argentina, for decades, has been considered a paradox — a country of great resources that falls regularly into economic crisis; a country with a highly educated public that continually slides into political chaos.

Paradox is seen in the survey results as well. Corruption in Argentina this year is rated at an all-time high, with 50% of respondents saying they are likely to lose business as a result — up from 30% in 2020. Argentina is seen as one of the four highest-risk countries in the region for corruption, on par with Venezuela, Bolivia, and Honduras: 67% now describe the country as having significant corruption, compared to slightly under 60% in both 2016 and 2020. These results could be driven by controversy in recent years around foreign exchange controls and the government approval system for access to dollars. While many companies have seen such access as business critical, the approval program has been riddled with accusations of corruption.

Dissatisfaction with corruption risk appears to be one of many reasons behind the dark horse victory of libertarian Javier Milei, who won the presidency in December 2023. One might also expect these conditions to drive companies to strengthen anti-corruption compliance protections. However, Argentina is one of few countries registering a drop in respondents stating that their company's management has taken steps to protect from corruption risk, down to 67% from 87% in 2020. This result is surprising given that, of the region's largest economies, respondents see Argentina as having the most significant levels of corruption in two-thirds of the government areas surveyed: in the executive branch (88% see significant corruption), legislative branch (82%), judicial branch (63%), customs (88%), at the municipal/local level (85%), and in state-owned companies (72%).

The drop in attention to corporate compliance could be due to companies' COVID-related budget restrictions and a struggling economy that has put great pressure on in-house legal and compliance budgets — and is likely amplified by a drop in any perceived deterrent effect of local anti-corruption laws due to minimal enforcement.



## BRAZIL

**Pessimism about anti-corruption enforcement in Brazil abounds.**

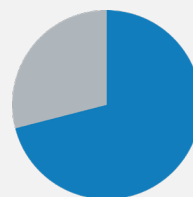
Brazilians are generally aware of the changes that have occurred to their anti-corruption laws, including adoption of the 2014 Clean Company Act and further modifications to that Act in 2022, which updated penalty calculations, clarified corporate compliance expectations, and required monitoring as a condition of leniency agreements.

Yet enforcement of the new law seems to have come with a downside. For instance, as *Lava Jato* chased bigger and bigger targets, leaks suggested the lead judge, Sergio Moro, had conspired with prosecutors in a bid to sideline former President Lula da Silva from the 2018 presidential election. By 2019, right-wing politician Jair Bolsonaro had won the presidency, assuming office on a wave of anti-corruption promises. But Bolsonaro, who appointed Moro as Minister of Justice and Public Security, was accused himself of being corrupt. The *Lava Jato* task forces then abruptly disbanded in the middle of Bolsonaro's term. In late 2019, Lula walked free from jail, and in 2022 took back the presidency, prompting a January 2023 assault on the capital by Bolsonaro supporters refuting the election results. After our survey closed, Brazil Supreme Court Judge José Antonio Dias Toffoli suspended the landmark fines imposed against Odebrecht (now called Novonor, Odebrecht was one of the initial targets of *Lava Jato*) after finding "collusion" between Judge Moro and the *Lava Jato* prosecutors.

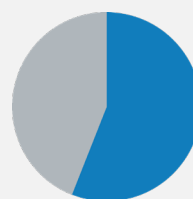
It is no wonder, then, that Brazilians maintain a broad and unequivocal pessimism about their country's anti-corruption regime. The country is only one of two where awareness of prosecutions has gone down since 2020, from 93% to 88%. There has also been a steep decline in Brazilians who believe an offender is likely to be prosecuted, decreasing from 86% in 2020 to 71% in this year's survey, and in contrast to a regionwide trend in the other direction.

What is more, despite the fact that the Clean Company Act has been in place for a decade, more Brazilians are saying laws are not effective or effective only to a small extent (56% in 2024 versus 44% in 2020). There has been a significant drop in Brazilians saying that the FCPA or other anti-corruption laws have helped mitigate risk of corruption to a moderate or significant extent (50% in 2024 compared to 74% in 2020) as well.

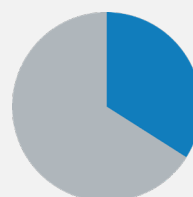
Brazilians display an unusually high lack of trust in prosecutorial bodies, too. Brazil ranks highest for respondents citing "fearful of leaks to public" (34%) as a reason for not reporting corruption to



**71% BELIEVE A CORRUPTION OFFENDER WILL BE PROSECUTED**



**56% SAY ANTI-CORRUPTION LAWS ARE NOT EFFECTIVE OR EFFECTIVE TO A SMALL EXTENT**



**34% CITE "FEARFUL OF LEAKS TO PUBLIC" AS A REASON FOR NOT REPORTING CORRUPTION**

authorities. This result might be directly linked to criticisms of Judge Moro in using leaks as a tactic to bolster support for *Lava Jato*. Such tactics, while boosting enforcement efforts at the time, might have had a detrimental effect on public confidence in the long term.

Perhaps most emblematic of Brazil's decline, when asked which countries will lead the way in the next three years in enforcing their anti-corruption laws, Uruguay has now overtaken Brazil as the third-ranked country (behind the U.S. and Chile). In 2020, 29% of respondents selected Brazil as a leading regional enforcer; this year, that number has fallen to 16%. This result is particularly telling since Uruguay has not necessarily been a country with any major enforcement actions to note in the last four years.

## CHILE

**Chile is a growing success story.**

Numerous data points reveal significant improvements in Chile since 2020. There has been a considerable jump in Chileans who are aware of prosecutions, from 38% in 2020 to 74% in 2024. The country also experienced the most dramatic increase in respondents thinking an offender is likely to be prosecuted, from 43% in 2020 to 79% in 2024.

Chileans are overwhelmingly aware that their anti-corruption laws have been strengthened, and more Chileans perceive their anti-corruption laws as effective to a moderate or significant extent (73% in 2024 versus 57% in 2020). Only 22% see corruption as a significant obstacle to doing business; this is up from 14% in 2020 but still on the low end when compared to the rest of the region.

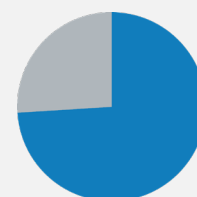
Chilean companies appear to be prioritizing anti-corruption compliance programs as well: when asked if, in the next 12 months, respondents believe their company will increase efforts and resources to improve awareness of and prevent corruption, 88% reported they would, up from 70% in 2020.

These changes might be partially explained by the strengthening (and clarifying) of the Chilean corporate criminal liability regime, which regulates compliance programs. In 2021, for instance, the *Corpesca Case* — involving corrupt payments by a fishing company to members of Congress — helped establish when and why a compliance program can be considered effective.

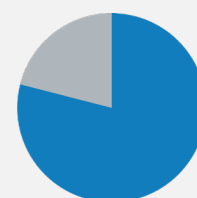
Most importantly, the ruling distinguished “paper models” (*i.e.*, programs that are only defined in policies but are not implemented or enforced) to “effectively implemented models.”

Further, in August 2023, President Gabriel Boric enacted the Economic Crimes Law, an ambitious reform that aims to fight corruption and white-collar crime. This new law will require that companies develop more sophisticated compliance programs and will go into effect in August 2024.

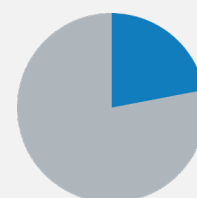
To be sure, corruption in Chile persists. In 2023, scandals like *Caso Convenios* caught the public’s attention and underscored the importance of corporate compliance programs. At the beginning of 2024, the prosecution of the former mayor of Maipu (one of the largest districts in Chile’s capital) for fraud also raised awareness of the need to include stronger anti-corruption rules and mechanisms — both in the public and private sector.



**74% ARE AWARE OF  
CORRUPTION PROSECUTIONS**



**79% BELIEVE A CORRUPTION  
OFFENDER WILL BE PROSECUTED**



**ONLY 22% SEE CORRUPTION AS A  
SIGNIFICANT OBSTACLE TO  
BUSINESS**

## COLOMBIA

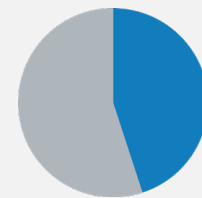
**Corruption increases in Colombia, as efficacy of local laws remains uncertain.**

Colombians have perceived steadily rising corruption levels for more than a decade. In 2012 and 2016, less than a quarter of respondents believed there was significant corruption in the country. In 2020, that figure increased to 31% and in 2024 it rose to almost half of respondents (45%). This places Colombia on par with countries like Brazil, Paraguay, and Peru for the first time when it comes to corruption risk.

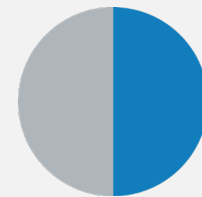
More Colombians say that corruption is now a significant obstacle to doing business, up from 23% in 2020 to 50% in 2024, and more Colombians cite business lost due to corruption (32% in 2020 versus 44% in 2024).

While Colombians are largely aware that the country's anti-corruption laws have been strengthened, and more people (perhaps as a result) think their laws are effective to a moderate or significant extent (37% in 2024 versus 23% in 2020), the overall percentage is still quite low. There is also a significant lack of trust among Colombians in the judicial branch: 67% of Colombians who did not report concerns of corrupt activities to authorities after losing business say it is for this reason, up from 43% in 2020.

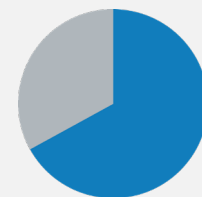
There appears to be less attention paid to anti-corruption compliance as well, even as local authorities have begun requiring corporate transparency and ethics programs. Fewer companies in Colombia consider dealing with corruption risk to be a top priority in 2024 (64%, versus 77% in 2020). When it comes to an increase in efforts and resources to improve awareness of and prevent corruption in the next 12 months, Colombia saw slight decreases (from 73% in 2020 to 69% in 2024) when one would expect this rate instead to increase.



**45% BELIEVE THERE IS  
SIGNIFICANT CORRUPTION IN  
THE COUNTRY**



**50% BELIEVE CORRUPTION IS A  
SIGNIFICANT OBSTACLE TO  
DOING BUSINESS**



**67% CITE "LACK OF TRUST IN  
JUDICIAL BRANCH" AS REASON  
FOR NOT REPORTING  
CORRUPTION**



## MEXICO

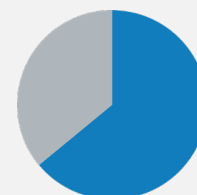
**Hardened views on corruption emerge in Mexico.**

Mexico adopted its National Anti-Corruption System in 2016 to much hope and fanfare. But years of weak local enforcement and pervasive corruption appear to have changed the attitudes of Mexican respondents: 63% think anti-corruption laws are not effective or only effective to a small extent and 64% see corruption as a significant obstacle to doing business in the country (consistent with our surveys in 2016 and 2020).

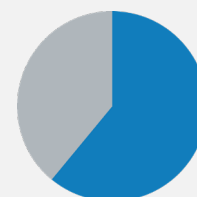
Mexican respondents' lack of trust in prosecution services and investigators is the highest of any of the major economies (57%, up from 47% in 2020); regionwide, it trails behind only Guatemala, Paraguay, Panama, and Uruguay.

The lack of local enforcement, and perhaps eased FCPA enforcement (Mexico used to be the country in Latin America triggering the most FCPA actions), might be leading companies to deprioritize corporate compliance. Nearly three-quarters of Mexican respondents say that dealing with corruption risk was a top priority in 2020, whereas that number declined to just 61% in 2024. When asked if their company will increase efforts and resources to improve awareness of and prevent corruption in the next 12 months, only 56% of Mexican respondents say yes — lower than the 60% regional average and down from 72% in 2020.

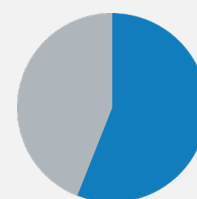
At the same time, Mexicans might be holding out hope that the environment could change, especially given the disproportionate impact that FCPA enforcement has historically had in the country. The country has the highest portion of respondents who say that enforcement of the FCPA or other anti-corruptions laws has helped mitigate corruption risk, with 70% saying it has done so to a moderate or significant extent, largely consistent with 2020.



**64% BELIEVE CORRUPTION IS A SIGNIFICANT OBSTACLE TO DOING BUSINESS**



**61% SAY DEALING WITH CORRUPTION RISK IS A TOP PRIORITY**



**56% SAY THEIR COMPANY WILL INCREASE ANTI-CORRUPTION EFFORTS IN THE NEXT 12 MONTHS (LOWER THAN REGIONAL AVERAGE)**

## PERU

### Political unrest in Peru drives perceptions of increased corruption risk.

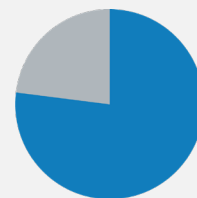
Peru has experienced two decades of economic growth. It has also made significant improvements to its local anti-corruption laws, in part to bring it in line with Organisation for Economic Cooperation and Development (OECD) commitments. It follows that Peru has among the highest percentage of respondents (76%) who are aware of the strengthening of local anti-corruption laws in recent years (second only to Chile, where 88% are aware).

But Peru's political climate appears to be undermining any progress. In the last four years, conditions have worsened dramatically, particularly given the attempted coup that resulted in President Pedro Castillo's impeachment and the resulting social unrest. At least five ex-presidents have now been investigated for corruption and the prevalence of corruption probes of high-level government officials has created the need to establish a "Special Team Against Corruption in Power." Consequently, Peru's survey results reveal a disturbing trend:

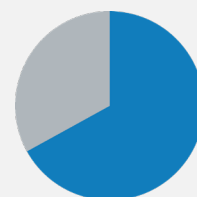
- ▶ Peru is one of the few countries where respondents in 2024 believe that an offender is less likely to be prosecuted than they did in 2020 (77% versus 85%)
- ▶ A striking 77% (up from 59% in 2020) of Peruvian respondents described corruption as a significant obstacle to doing business, putting Peru among the top three most challenged countries, alongside Guatemala and Honduras
- ▶ Peru shows a significant spike in respondents who say they have lost business due to corruption: from 12% in 2020 to 68% in 2024 (68%)

Companies' commitments to corporate compliance might also be affected. Despite the fact that local laws treat compliance programs as a mitigating factor in sanctions calculations, fewer companies in Peru are treating corruption risk as a top priority (from 73% in 2020 to 50% in 2024, lower than the regional average of 56%).

When asked if their company will increase efforts and resources to improve awareness of and prevent corruption in the next 12 months, only 64% of Peruvians say they would — down from 73% in 2020, though still slightly above the regional average of 60%. These attitudes might be shaped by the fact that, four years ago, *Lava Jato*-related investigations in Peru were still quite fresh in people's minds. In 2024, those investigations may have become a distant memory.



**77% BELIEVE CORRUPTION IS A SIGNIFICANT OBSTACLE TO DOING BUSINESS**



**68% HAVE LOST BUSINESS DUE TO CORRUPTION**



**50% SAY DEALING WITH CORRUPTION RISK IS A TOP PRIORITY**

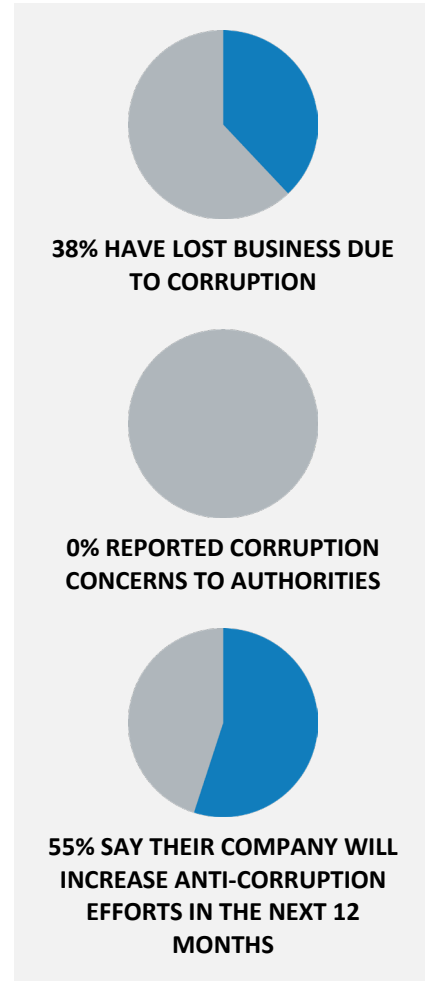
UNITED STATES

**Lukewarm FCPA enforcement might be affecting U.S. companies' attention to corporate compliance.**

When asked to what extent FCPA enforcement or other anti-corruption laws help mitigate corruption risk, the number of U.S. respondents who say, “to a significant or moderate extent” has declined from 75% in 2020 to 67% in 2024. Similarly, those who say their company will increase efforts and resources to improve awareness of and prevent corruption in the next 12 months also decreased, from 68% in 2020 to 55% in 2024. Thirty-eight percent of U.S. respondents say they lost business to competitors due to corruption, but no U.S. respondents say they reported their concerns to the authorities.

These slight changes could be reflective of lackluster FCPA enforcement in recent years, and an associated decline in the law’s deterrent effect. After a peak of 40 corporate enforcement actions in 2016, enforcement activity has been relatively low over the past four years, with only 14 enforcement actions in 2023, 12 in 2022, six in 2021, and 18 in 2020. At the same time, more U.S. respondents believe that offenders are likely to be prosecuted in the U.S. (84% in 2024 versus 74% in 2020), suggesting that the aggressive FCPA enforcement of prior years continues to influence respondents’ thinking.

On a positive note, the U.S. continues to be viewed as one of the three least corrupt countries for doing business, alongside Uruguay and Chile.

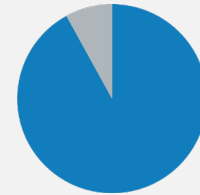


## VENEZUELA

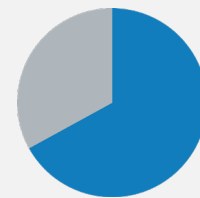
**Venezuela emerges as the most corrupt country surveyed.**

Unlike in 2020, Venezuelans this year actively participated in the survey, suggesting that instability in the country is no longer a factor keeping people from responding. Nonetheless, respondents with experience in Venezuela still see it as the most corrupt country in Latin America for doing business. Asked to rate countries where they have business experience, 92% (compared to 90% in 2020) say that Venezuela displays significant corruption.

One driver appears to be the lack of trust in Venezuela's judicial branch: 67% of Venezuelans cite this as the primary reason for not reporting corruption to authorities. Weak judicial systems can have a deep and systemic effect on the prevalence of corruption. It suggests that businesspeople and government officials will not be held accountable, which in turn enables corruption to flourish.



**92% SAY THERE IS SIGNIFICANT  
CORRUPTION IN THE COUNTRY**

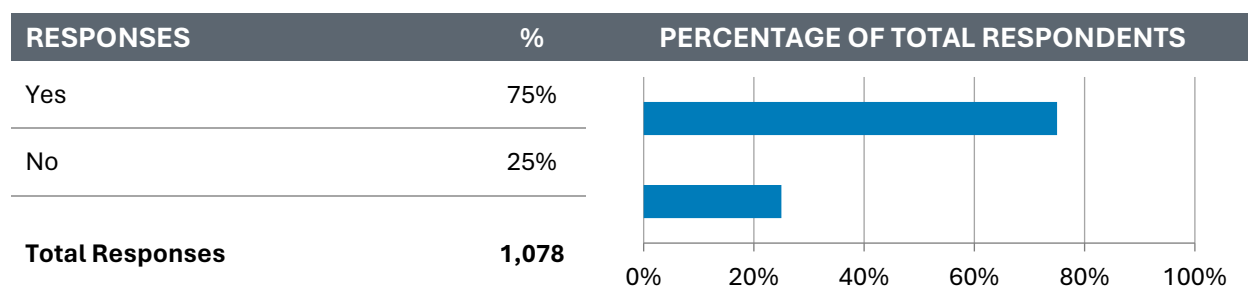


**67% CITE "LACK OF TRUST IN  
JUDICIAL BRANCH" AS REASON  
FOR NOT REPORTING  
CORRUPTION**

## PROSECUTION OF OFFENDERS

### Q1

In the country where you work, are you aware of any company, individual, or government official being prosecuted for making or receiving an improper payment, gift, or other benefit related to obtaining business?



Though perceptions of corruption levels remain high regionwide, awareness of prosecutions has improved: 75% of respondents in 2024 say they are aware of offenders being prosecuted, versus 64% in 2020 and 2016. Awareness increased in 75% of countries surveyed in 2024, compared to 58% in 2020. Only the U.S. and Uruguay remained stagnant, likely because awareness in these countries was already high.

### COUNTRY-SPECIFIC HIGHLIGHTS

- ▶ Awareness of prosecutions in Chile went up significantly, from 38% to 74%
- ▶ Brazil is one of only two countries, alongside Paraguay, where awareness decreased
- ▶ Sixty-one percent of Venezuelan respondents say they are aware of prosecutions there; this result is likely driven by FCPA and anti-money laundering (AML) prosecutions being publicized in the country. Since 2009, there have been nine corporate enforcement actions involving misconduct in Venezuela. U.S. authorities have charged 28 individuals in cases involving corrupt conduct in Venezuela, including 11 Venezuelan nationals.

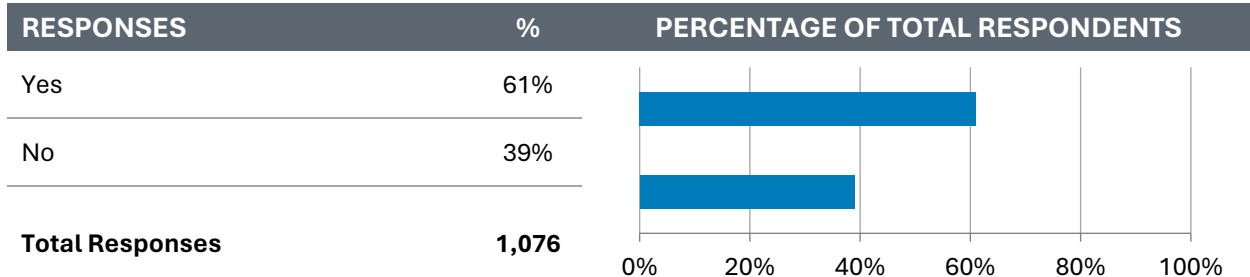
COUNTRY	2024	2020	% CHANGE
<b>ALL COUNTRIES</b>	<b>75%</b>	<b>64%</b>	<b>▲ 18%</b>
Argentina	83%	61%	▲ 36%
Bolivia	72%	59%	▲ 22%
Brazil	88%	93%	▼ 5%
Chile	74%	38%	▲ 96%
Colombia	75%	55%	▲ 38%
Costa Rica	78%	63%	▲ 34%
Dominican Republic	97%	64%	▲ 53%
Ecuador	84%	67%	▲ 24%



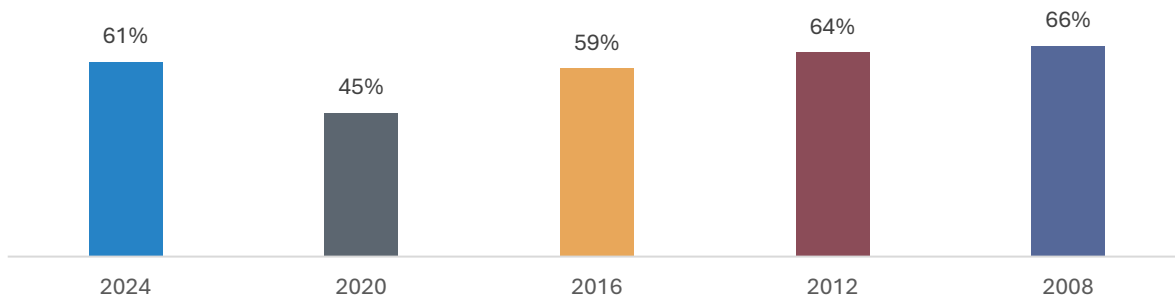
COUNTRY	2024	2020	% CHANGE
Guatemala	92%	73%	▲ 26%
Honduras	72%	SAMPLE SIZE TOO LOW	
Mexico	59%	49%	▲ 21%
Panama	86%	75%	▲ 15%
Paraguay	70%	76%	▼ 7%
Peru	86%	73%	▲ 19%
United States	61%	62%	▼ 2%
Uruguay	36%	36%	▲ 0%
Venezuela	61%	SAMPLE SIZE TOO LOW	

Q2

Do you believe an offender is likely to be prosecuted?



YEAR OVER YEAR ("yes" responses only)



In 2024, 61% of respondents say they believe an offender is likely to be prosecuted, up from 45% in 2020 — perhaps a result of growing awareness of prosecutions, as noted above. The dip in 2020, which saw the lowest confidence in offender prosecution of all our surveys dating back to 2008, was possibly the result of the end of the *Lava Jato* prosecutions and other investigations in the region’s larger economies. For example, the so-called *Notebook* scandal in Argentina seemed to begin with strong evidence off of which to build cases: driver Óscar Centeno worked for public officials under Cristina Fernández de Kirchner and Néstor Kirchner and produced notebooks allegedly detailing decades of bribes. But local prosecutions never gained momentum or concluded any relevant cases.

**PARTICIPANT COMMENT**

**“Lack of trust in the judiciary, in the police, in the prosecutor’s office, and in all control entities that are as or more corrupt than those who bribe.”**

PARTICIPANT FROM ECUADOR

In 2020, we also observed that respondents from multinational companies were more confident (53%) in offender prosecutions than those from local or regional companies (38%). In 2024, this gap has shrunk, with 66% of respondents from multinational corporations now expressing confidence in this area, compared to 57% from local and regional companies. Again, this may be a byproduct of

growing awareness and meaningful increases in prosecutions in certain countries (highlighted below).

Respondents in Brazil, Chile, Colombia, the Dominican Republic, Panama, Peru, and the U.S. all express significantly more or less confidence about offenders being prosecuted than in 2020.

**Countries that are more confident in offender prosecution include:**

- ▶ Chile: up to 79% from 43% in 2020
- ▶ Colombia: up to 52% from 27% in 2020
- ▶ Dominican Republic: up to 67% from 28% in 2020
- ▶ Panama: up to 53% from 27% in 2020
- ▶ United States: up to 84% from 74% in 2020

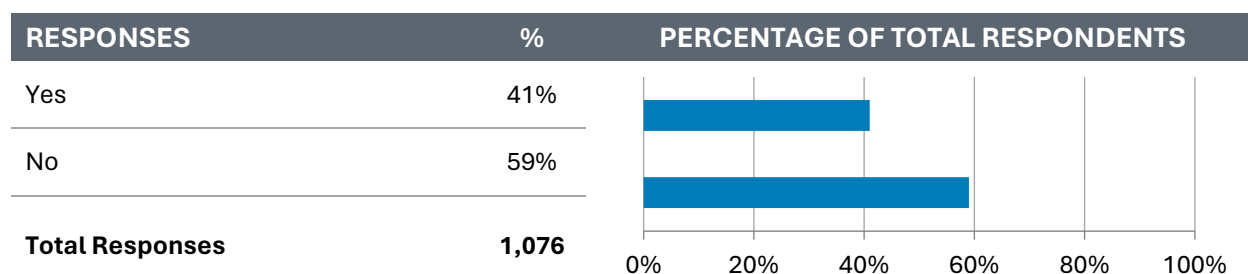
**Countries that are less confident in offender prosecution include:**

- ▶ Brazil saw the steepest decline, descending from 86% in 2020 to 71% in 2024; in 2020, it had the most positive responses of any country
- ▶ Peru: down from 85% in 2020 to 77% in 2024

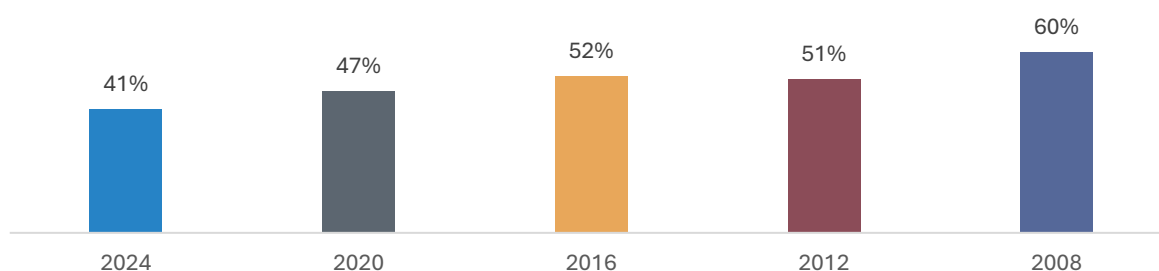
COUNTRY	2024	2020	% CHANGE
<b>ALL COUNTRIES</b>	<b>61%</b>	<b>45%</b>	<b>▲ 36%</b>
Argentina	40%	39%	▲ 3%
Bolivia	48%	37%	▲ 30%
Brazil	71%	86%	▼ 17%
Chile	79%	43%	▲ 83%
Colombia	51%	27%	▲ 87%
Costa Rica	70%	67%	▲ 5%
Dominican Republic	67%	28%	▲ 140%
Ecuador	51%	26%	▲ 93%
Guatemala	50%	61%	▼ 18%
Honduras	28%	SAMPLE SIZE TOO LOW	
Mexico	39%	34%	▲ 16%
Panama	53%	27%	▲ 98%
Paraguay	59%	44%	▲ 34%
Peru	77%	85%	▼ 9%
United States	84%	74%	▲ 13%
Uruguay	74%	75%	▼ 1%
Venezuela	37%	SAMPLE SIZE TOO LOW	

# CONSEQUENCES OF CORRUPTION

## Q3 Do you believe your company has lost business to competitors that have made illicit payments?



### YEAR OVER YEAR ("yes" responses only)



Despite the pervasive corruption perceived by this year’s respondents, 2024 saw a meaningful decline in those who believe their companies have lost business to competitors that have made illicit payments. Overall, this number has declined since our inaugural survey in 2008. This trend is likely a result of the improved corporate compliance environment throughout the region over the past 15 years (see Questions 13 and 14 below).

This trend continues when comparing company type. While respondents from local/regional companies still more frequently perceive that they have lost business to corrupt competitors (45%) than those from multinational companies (34%), both groups have seen steady improvement over time (54% versus 39% in 2020, and 59% versus 46% in both 2016 and 2012, respectively). The gap between multinationals and local/regional companies likely reflects the relative strength of the former’s compliance programs (see Questions 15-17 below).

### Countries that saw notable increases in respondents reporting business loss due to corruption:

- ▶ Argentina: up to 50% from 30% in 2020
- ▶ Colombia: up to 44% from 32% in 2020
- ▶ Guatemala: up to 67% from 42% in 2020

- ▶ Peru: up to 68% from 12% in 2020

**Countries that saw notable decreases in respondents reporting business loss due to corruption:**

- ▶ Brazil: down to 35% from 41% in 2020
- ▶ Dominican Republic: down to 53% from 68% in 2020
- ▶ Mexico: down to 31% from 43% in 2020
- ▶ Panama: down to 52% from 59% in 2020
- ▶ United States: down to 38% from 50% in 2020

**Countries where results remained relatively stagnant (5% or less change):**

- ▶ Bolivia
- ▶ Chile
- ▶ Costa Rica
- ▶ Ecuador

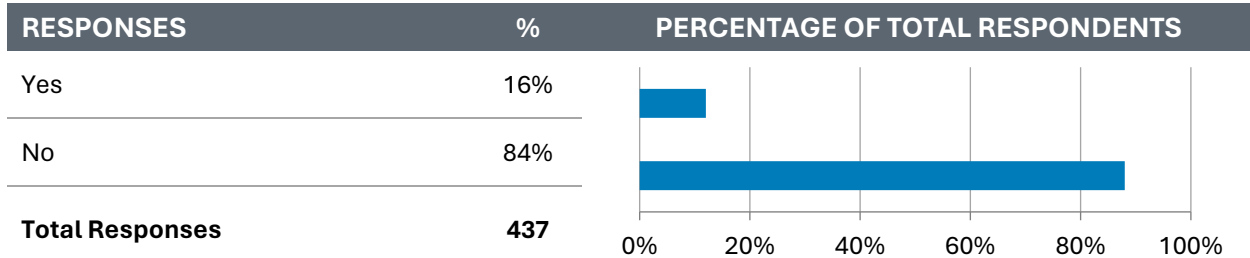
Over half of the countries surveyed saw 50% or more respondents saying that they have lost business due to corruption (in red below).

COUNTRY	2024
<b>ALL COUNTRIES</b>	<b>41%</b>
Argentina	50%
Bolivia	48%
Brazil	35%
Chile	21%
Colombia	44%
Costa Rica	39%
Dominican Republic	53%
Ecuador	56%
Guatemala	67%
Honduras	83%
Mexico	31%
Panama	52%
Paraguay	52%
Peru	68%
United States	38%
Uruguay	8%
Venezuela	61%



**Q4**

**When losing business to competitors, did you report your concerns to authorities?**



Despite some improvements in awareness of — and confidence in — offender prosecutions, reporting to authorities has remained extremely low since 2012, and only reached 16% this year (compared with 12% in 2020).

**Countries where respondents are most likely to report to authorities:**

- ▶ Costa Rica: 44%, up from 34% in 2020
- ▶ Dominican Republic: 32%, up from 22% in 2020
- ▶ Paraguay: 36%, up from 25% in 2020

Notably, no U.S. respondents reported concerns, even though 38% say they lost business to competitors. And in Colombia, 23% say they reported concerns, up from 0% in 2020.

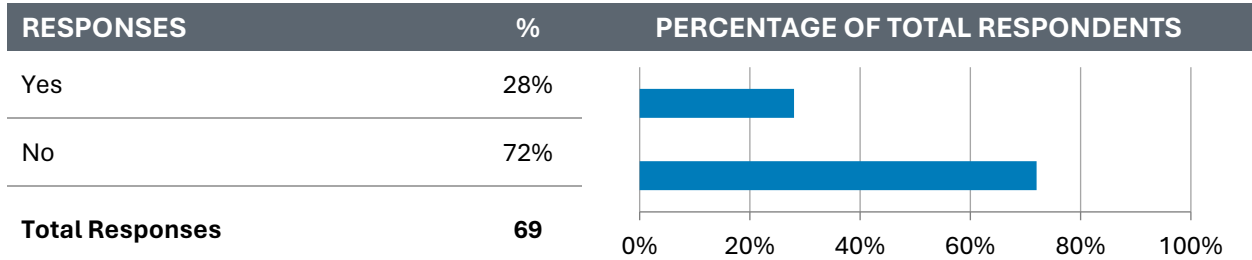
**PARTICIPANT COMMENT**

**“The system has little credibility because we have reported other things before and nothing happens.”**

PARTICIPANT FROM CHILE

**Q5**

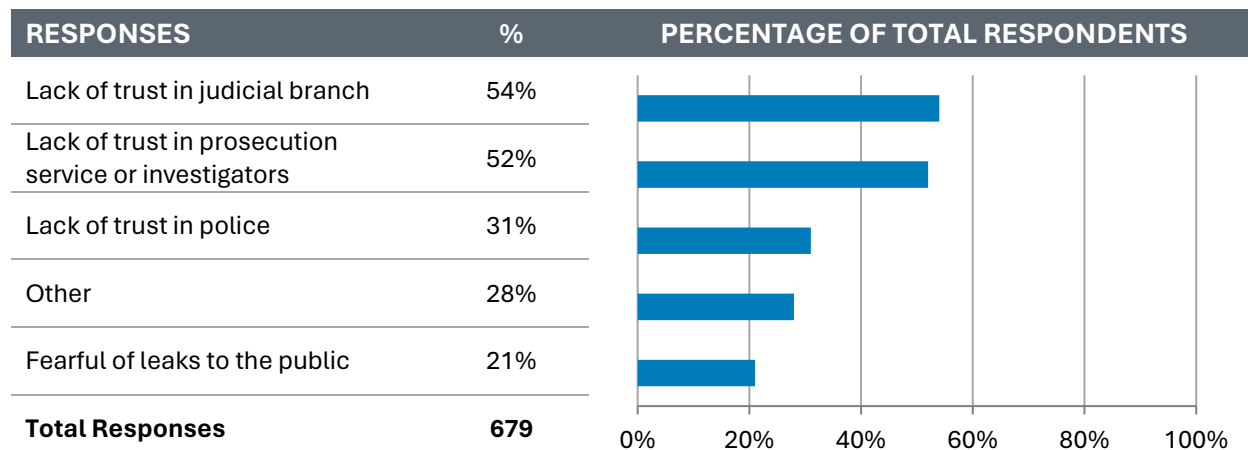
**After you reported your concerns, did authorities act?**



Of the 16% of respondents who did report their concerns to the authorities, less than a third say that the government investigated the matter, which is generally consistent with responses since 2016.

## Q6

## What were your primary reasons for not reporting to authorities?



As in 2020, the top reasons for not reporting to authorities were lack of trust in the judicial branch (54%, compared to 56% in 2020) and lack of trust in prosecution services or investigators (52%, same as 2020). Respondents who chose “other” cite a range of issues including the difficulty of proving corruption, “low faith in the system,” “waste of time/energy,” and “fear of being subject to robbery or other security issues from involving authorities.”

#### Lack of trust in the judicial branch was most prominent in:

- ▶ Bolivia: 82%, same as in 2020
- ▶ Colombia: 67%, up from 43% in 2020
- ▶ Ecuador: 72%, up from 69% in 2020
- ▶ Guatemala: 86%, up from 50% in 2020
- ▶ Venezuela: 67%, no responses in 2020

#### Lack of trust in prosecution services or investigators was most prominent in:

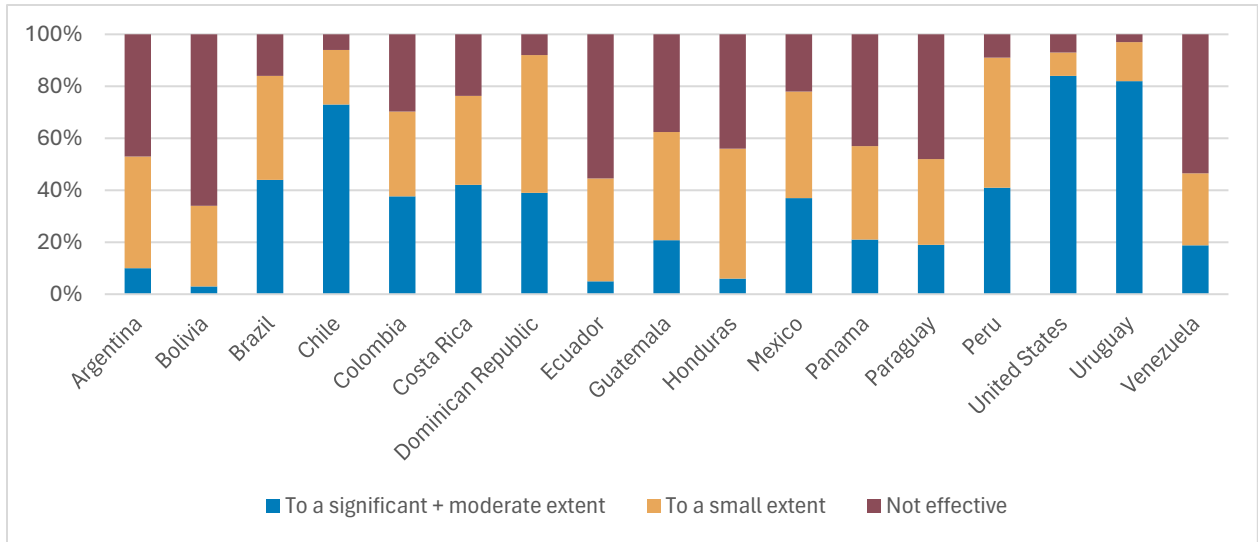
- ▶ Guatemala: 86%, up from 50% in 2020
- ▶ Mexico: 57%, up from 47% in 2020
- ▶ Panama: 63%, up from 48% in 2020
- ▶ Paraguay: 78%, up from 44% in 2020
- ▶ Uruguay: 57%, no responses in 2020
- ▶ Venezuela: 57%, no responses in 2020

U.S. respondents chose “other” more than their Latin American counterparts, with most citing a lack of confidence in the evidence at their disposal; for example, “no specific information to report,” “not 100% certain or have proof of the illicit payments,” and “no definitive proof.” This suggests a confidence in the ability of U.S. authorities to respond to actionable information and a perceived credibility in the U.S. investigative process.

Brazilian respondents were most concerned about leaks to the public (34%), which is likely driven by widespread public reports of leaks by Judge Sergio Moro amid *Lava Jato*.

# EFFECTIVENESS OF ANTI-CORRUPTION LAWS

## Q7 To what extent do you think anti-corruption laws are effective in the country where you work?



Anti-corruption laws are perceived as more effective now than they were four years ago. Forty percent of respondents nationwide say such measures are effective in the country where they work to either a moderate (30%) or significant (10%) extent — up 10 percentage points from 2020. Only 26% believe they are not effective at all, down from 37% in 2020.

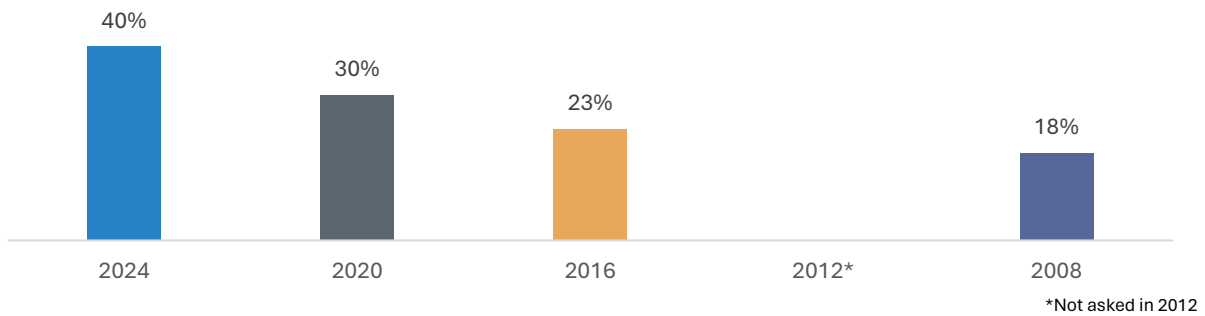
This also represents a steady upward trend over prior years:

**PARTICIPANT COMMENT**

**“Anti-corruption laws are only applied as political revenge between antagonistic groups vying for power.”**

PARTICIPANT FROM MEXICO

### YEAR OVER YEAR (“to a significant + moderate extent” responses only)





This could relate to the more established nature of stronger laws that were adopted over the past 10 years, including those creating corporate criminal and administrative liability for bribery and corruption in Argentina, Brazil, Chile, Colombia, Costa Rica, Mexico, and Peru (as discussed in our 2020 report).

At the same time, these improvements do not necessarily correlate to more reporting of corruption to authorities (as evinced above in Questions 4 and 6), revealing that a lack of faith in institutions is still a significant obstacle to addressing corruption.

#### **Countries where laws are perceived as least effective:**

- ▶ Bolivia: 66% say laws are not effective
- ▶ Ecuador: 56%
- ▶ Venezuela: 54%

#### **Countries where laws are perceived as most effective:**

- ▶ United States: 84% say laws are at least moderately effective
- ▶ Uruguay: 82%
- ▶ Chile: 73%

In only two of seven countries that have strengthened their laws (Colombia and Chile), do we see a positive change in perceptions of effectiveness, and only Chile seems to have a credible regime in place. Nevertheless, respondents from countries that have strengthened their laws still on average perceive their anti-corruption laws as more effective than those that have not.

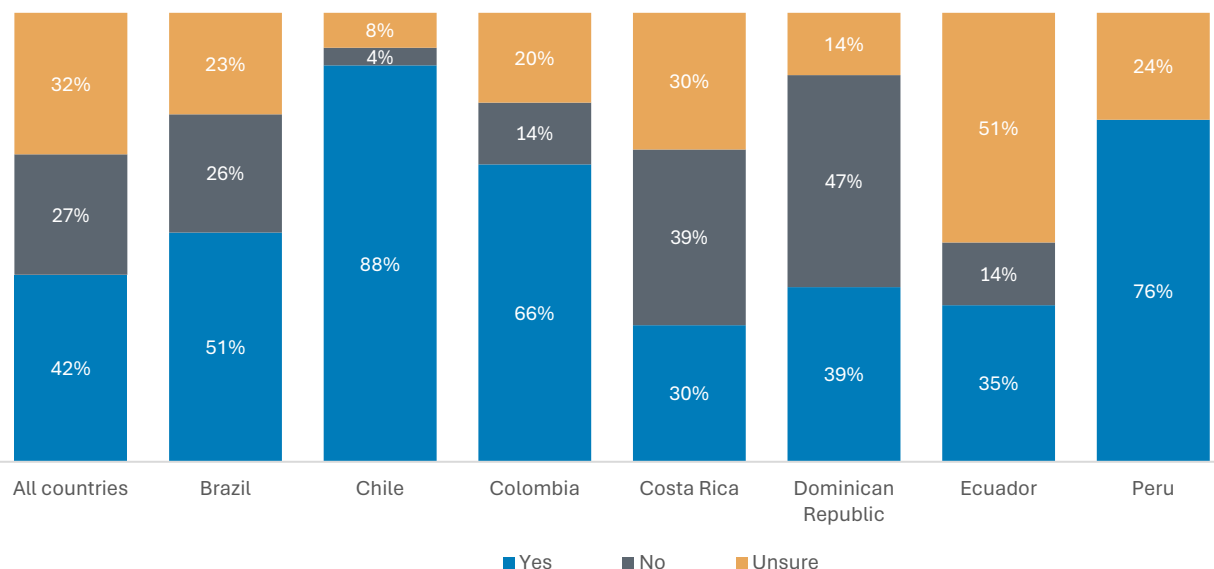
(Note: In what follows, we define “not effective” as those who perceive laws as not effective or effective only to a small extent and “effective” as those who perceive laws as effective to a moderate or significant extent.)

- ▶ Argentina: More respondents think laws are not effective (90% compared to 85% in 2020)
- ▶ Brazil: More respondents think laws are not effective (56% compared to 44% in 2020)
- ▶ **Chile: More respondents think laws are effective (73% compared to 57% in 2020)**
- ▶ **Colombia: More respondents think laws are effective, but that percentage is still low (37% compared to 23% in 2020)**
- ▶ Costa Rica: Fewer respondents think laws are effective (48% compared to 56% in 2020)
- ▶ Mexico: Fewer respondents think laws are not effective, but still a considerable level (63% compared to 76% 2020)
- ▶ Peru: More respondents think laws are not effective (59% compared to 45% in 2020)

As in years past, a higher percentage of respondents from local/regional companies (66%) than from multinationals (52%) believe anti-corruption laws are ineffective in the countries where they work. This result could be because local/regional companies are more reliant than multinationals on local laws to protect market integrity and therefore might feel the inadequacy of local laws more acutely.

Q8

Have anti-corruption laws in your country changed in the last four years?



Over the last four years, certain countries have modified their anti-corruption laws to strengthen prohibitions or refine compliance expectations. Note that more widespread changes occurred to anti-corruption laws throughout the region in the 2010s, summarized in our 2020 survey. The following changes occurred more recently:

- ▶ **Brazil:** In July 2022, the Brazilian government published Federal Decree No. 11,129/22, regulating the Brazilian Clean Company Act by changing fine calculations, increasing fine reduction based on compliance programs, and requiring monitoring as a component of leniency agreements.
- ▶ **Chile:** In August 2023, Chile enacted its Economic Crimes Law, expanding the catalogue of crimes for which companies can be liable, relieving a company of liability in the event it can show it has an effective compliance program in place, and contemplating imposition of monitors in cases where corporate criminal liability is established.
- ▶ **Colombia:** In August 2021, Colombia expanded the categories of companies required to adopt “Transparency and Business Ethics Programs,” creating widespread requirements for companies in numerous industries to have compliance program elements in place.
- ▶ **Costa Rica:** In September 2023, the country reformed its laws to address recommendations from OECD’s Working Group on Bribery.

**PARTICIPANT COMMENT**

**“The new laws may be better. The problem is that they do not apply them or they apply them at convenience.”**

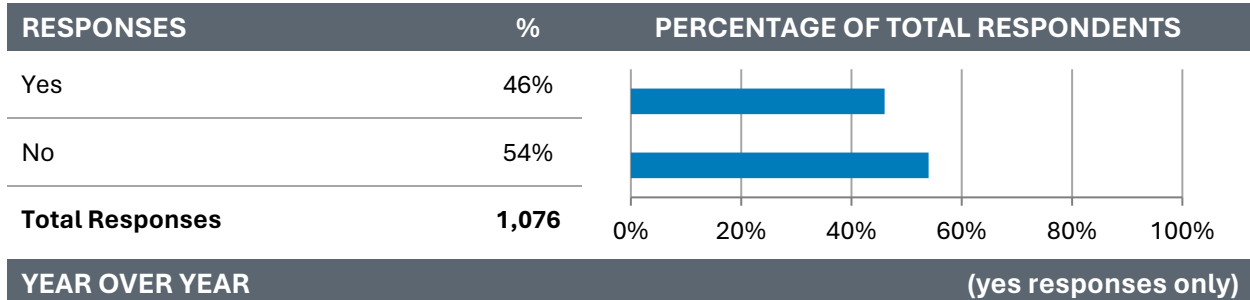
PARTICIPANT FROM ECUADOR

- ▶ **Ecuador:** In February 2021, the country reformed the anti-corruption provisions of its criminal code to introduce new crimes like private sector corruption, obstruction of justice, and overpricing in public contracting; modify penalties; and make anti-corruption compliance programs a mitigating measure for penalty calculations.
- ▶ **Peru:** In May 2023, the country modified its corporate criminal liability law by expanding the catalogue of crimes for which liability can be attributed to companies to include offenses like parallel accounting and failure to report suspicious transactions or operations, and by updating penalty criteria calculations and clarifying jurisdiction over foreign companies.

It appears that respondents are generally aware of changes in Brazil, Chile, Colombia, and Peru. This might not be a surprise as these updates, especially in the latter three countries, were widely publicized. In Colombia, companies from many sectors have directly experienced the legal obligation to adopt and implement compliance programs in line with specific requirements under local law.

**Q9**

**Is corruption a significant obstacle to doing business for your company?**



Corruption continues to be a significant obstacle to doing business; since 2012, roughly half of respondents believe this is the case. The spike in 2020 can be correlated to the drop that year in belief that an offender is likely to be prosecuted. As discussed above in Question 2, the decrease that year could be due to the fallout from *Lava Jato* and other highly publicized scandals, where major corruption events had occurred but the response by local authorities were commonly seen as inadequate.

**Countries where corruption is perceived as the most significant obstacle include:**

- ▶ Guatemala: 79% say it is a significant obstacle
- ▶ Honduras: 78%
- ▶ Peru: 77%
- ▶ Ecuador: 70%

**Countries where corruption is perceived to be the least significant obstacle:**

- ▶ United States: 13% say it is a significant obstacle
- ▶ Uruguay: 15%
- ▶ Chile: 22%, up from 14% in 2020

**PARTICIPANT COMMENT**

**“The company does not suffer much from commercial corruption, only state corruption, which our company is not able to do much to overcome.”**

PARTICIPANT FROM BRAZIL

**Significant increases in corruption as an obstacle were perceived in:**

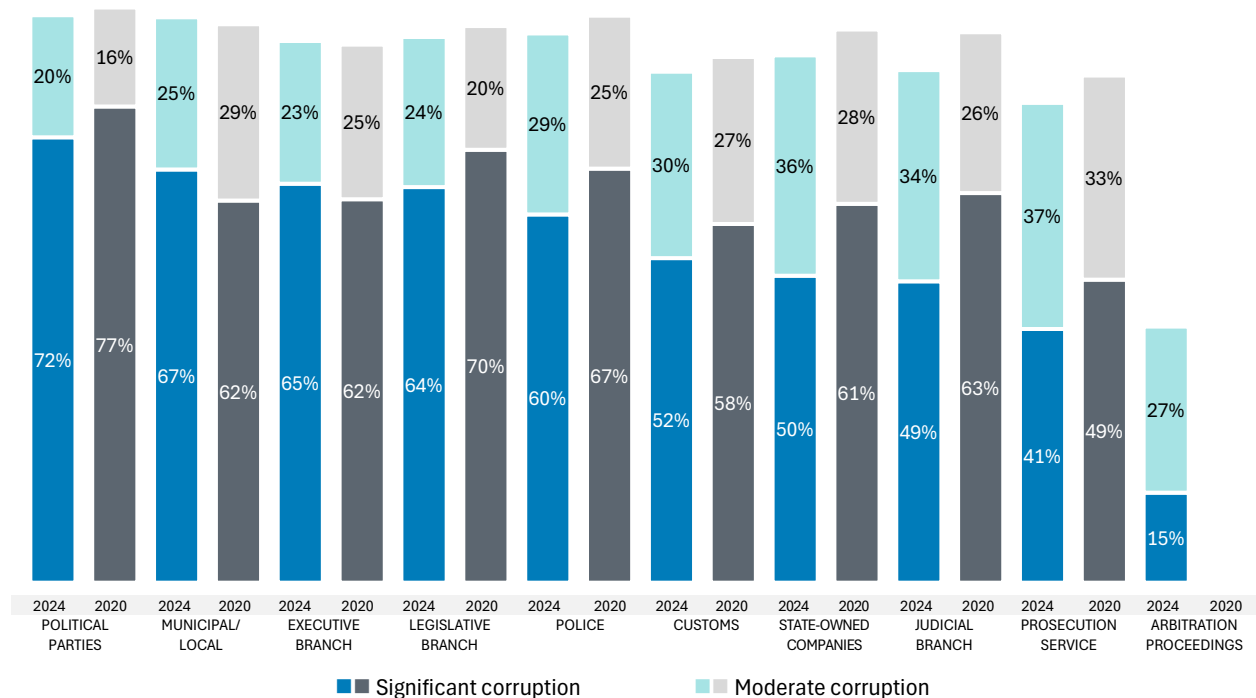
- ▶ Colombia: up to 50% from 23% in 2020
- ▶ Costa Rica: up to 52% from 30% in 2020
- ▶ Guatemala: up to 79% from 55% in 2020
- ▶ Peru: up to 77% from 59% in 2020

When differences between multinational and local/regional company respondents are considered, this year's survey continues a trend first seen in our 2020 survey. Unlike in 2012 and 2016, where local/regional company respondents saw corruption as a significant obstacle at a greater rate than respondents from multinational companies, in 2020 — and even more so in 2024 — respondents from both company types perceive corruption as a significant obstacle at roughly the same rate (48% of local/regional company respondents versus 43% of multinational company respondents). Local/regional companies perceive risk at low rates now, possibly as a result of improved compliance programs regionwide (discussed below in Question 14).



# CORRUPTION LEVELS

**Q10** To the extent corruption exists in the country where you work, rank the level of corruption in the following areas.



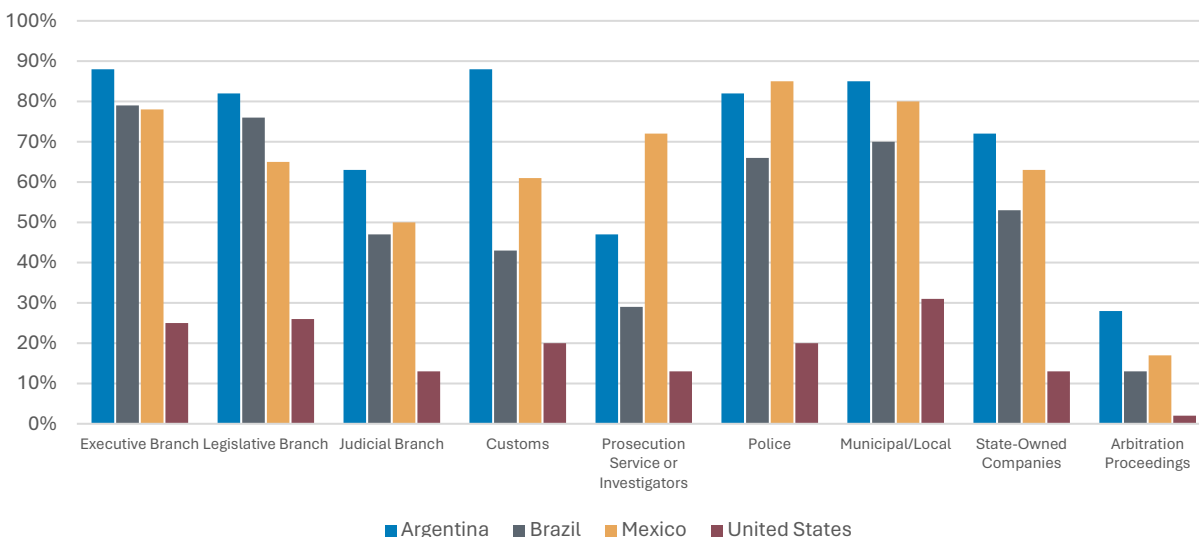
Regionwide, corruption is seen as highest in political parties (72% perceive significant corruption, relatively consistent with 2020), local authorities/municipalities (67%), and the executive branch (65%).

Perceptions of significant corruption in municipal/local governments went up five percentage points since 2020. Despite progress at the federal level in many countries — mainly with regards to implementing transparency initiatives and controls — companies still face endemic risks at the local level, including in countries like Mexico, Brazil, and Colombia. This risk often involves requests for smaller payments for permitting and regulatory issues which can be particularly challenging under the FCPA, which has no materiality threshold. While the FCPA does offer a facilitating payments exception, companies rarely use it given its multiple legal and practical limitations.

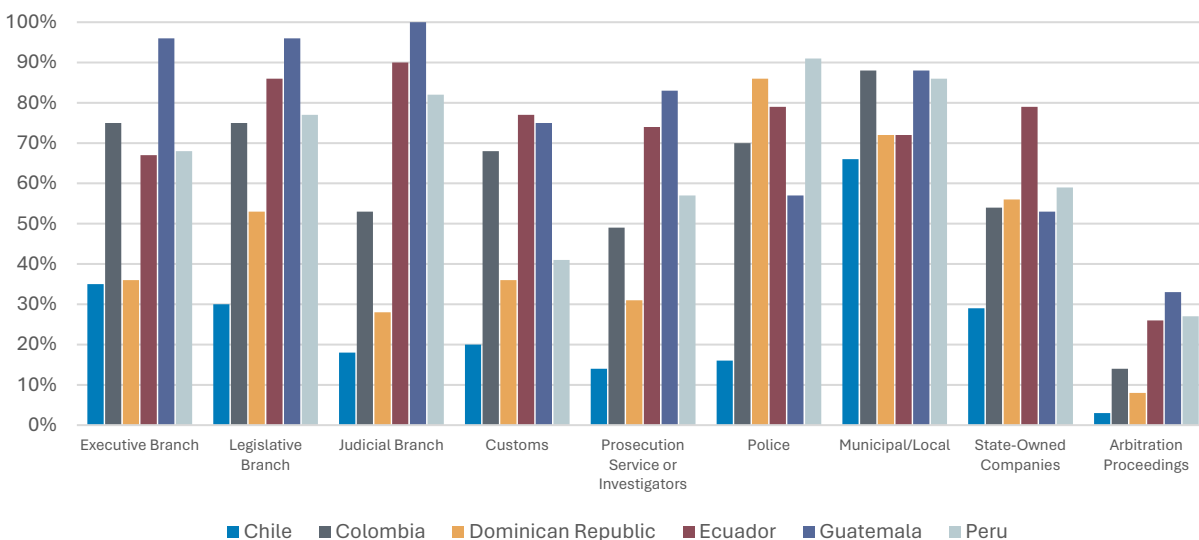
Perceived corruption in the executive branch (65%), the legislative branch (64%), and the police (60%) all remain consistent with our 2020 and 2016 surveys. Corruption risk manifests in these areas in various ways, be it influencing a country’s most senior officials to win government business, lobbying legislators for policy modifications, or seeking to avoid police harassment on highways and at checkpoints.

About half of respondents view customs (52%), state-owned companies (50%), and the judicial branch (49%) as significantly corrupt, while prosecution services and investigators are viewed as slightly less corrupt (41%). Arbitration proceedings are seen as the least tainted government area, with only 15% citing significant corruption, perhaps given the involvement of market and private sector actors in such proceedings.

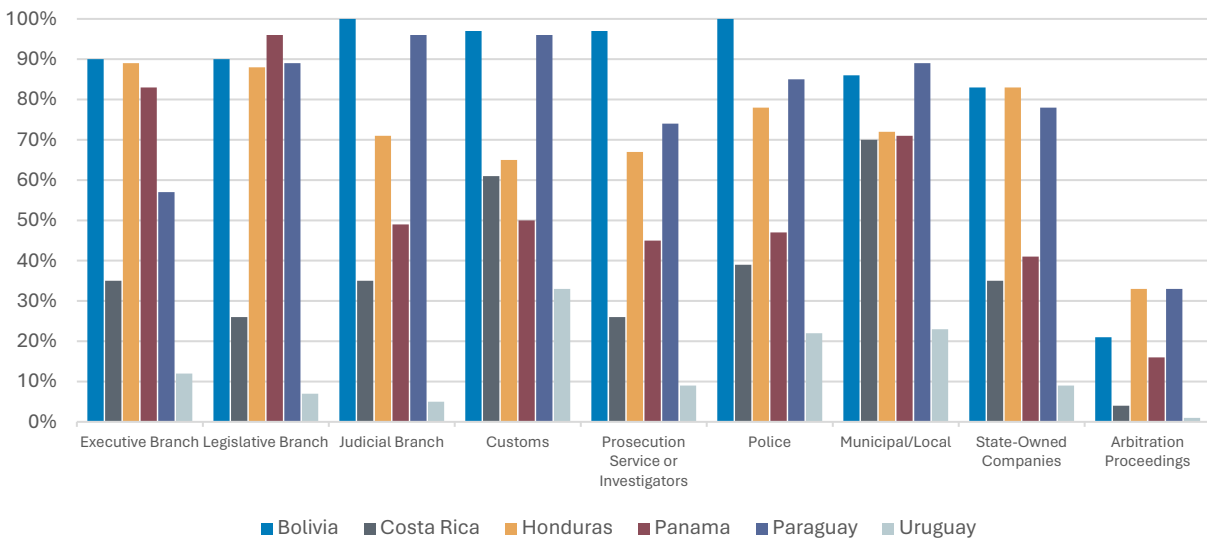
**Significant corruption perceived in government entities by larger countries (over US\$500 billion GDP)**



**Significant corruption perceived in government entities by mid-size countries (US\$100-500 Billion GDP)**

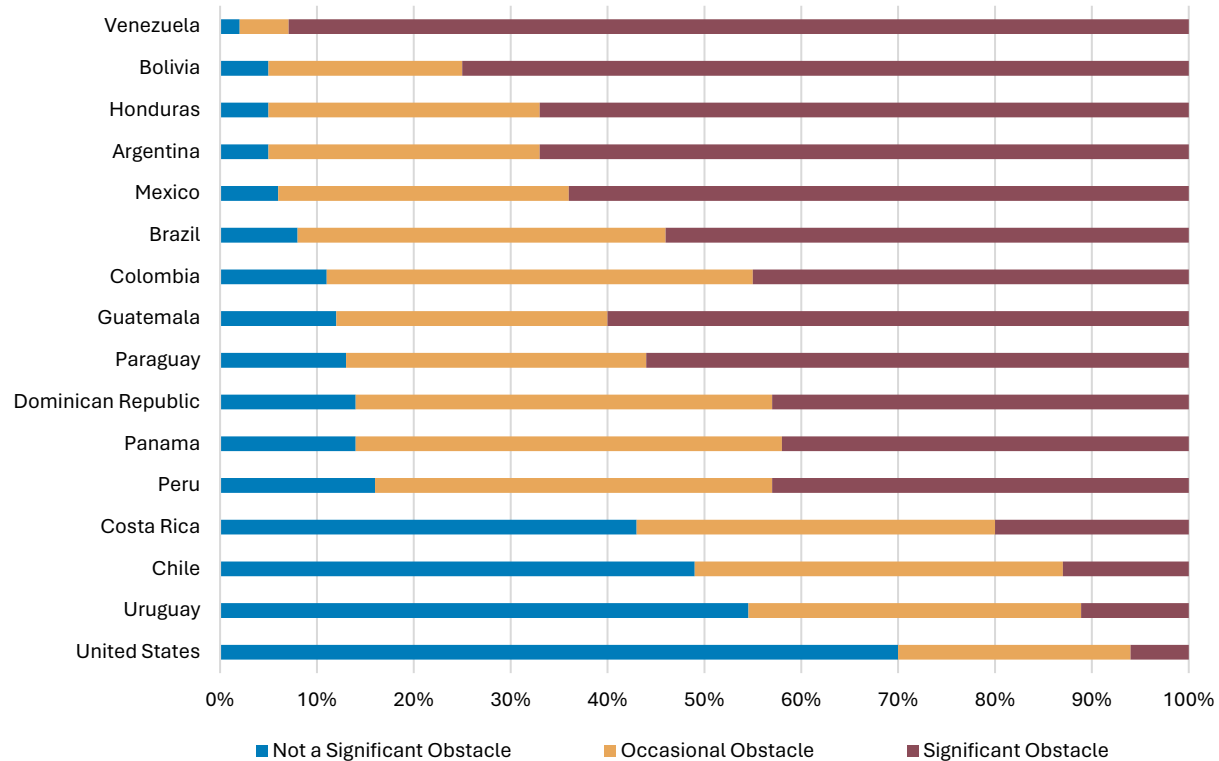


**Significant corruption perceived in government entities by smaller countries (less than US\$100 billion GDP)**



**Q11**

**How would you rate corruption in the countries where you have business experience?**



**Most corrupt countries**

Venezuela, Bolivia, Honduras, and Argentina continue to be seen as the highest risk countries. Of particular note:

- ▶ In Argentina, 67% of respondents say the country has significant corruption, compared to slightly under 60% in both 2016 and 2020
- ▶ In Bolivia, 75% of respondents say the country has significant corruption, compared to around 60% in 2016 and 2020

**Least corrupt countries**

As in 2016 and 2020, the United States, Chile, and Uruguay continue to be ranked the least corrupt countries. Of particular note:

- ▶ In Chile and Uruguay, about half of respondents state that corruption is not a significant obstacle
- ▶ In the United States, 70% say as much, slightly down from 75% in 2020 and 2016

- ▶ Notably, Costa Rica is close behind, with 43% stating corruption is not a significant obstacle, and only 20% saying that it is significant

Corruption in two other major economies (per the GDP classification above), Brazil and Mexico, has remained consistent, with slightly more than half of respondents citing significant corruption in Brazil and 64% saying as much for Mexico.

The views of corruption risk in Colombia, meanwhile, have steadily increased over the years. In 2012 and 2016, less than a quarter of respondents with experience in Colombia stated that there was significant corruption there. In 2020, that figure increased to 31% and, in 2024, has risen to 45%, placing Colombia for the first time on par with risk levels perceived in countries like Brazil, Paraguay and Peru.

For several mid-sized countries (per the GDP classification above), there has been an increase in perceptions of significant corruption when compared to the previous decade:

- ▶ Guatemala: 60% in 2024, about 50% in 2020 and 2016, and below 50% in 2012
- ▶ Panama: 42% in 2024, about 35% in 2020 and 2016, and less than 20% in 2012
- ▶ Paraguay: 56% in 2024, and about 50% in 2020 and 2016 (no data was collected in 2012)
- ▶ Peru: 43% in 2024, about 40% in 2020 and 2016, and less than 20% in 2012

**Q12**

Rank the activities you think may prove effective in reducing overall corruption in the countries where you have business experience.

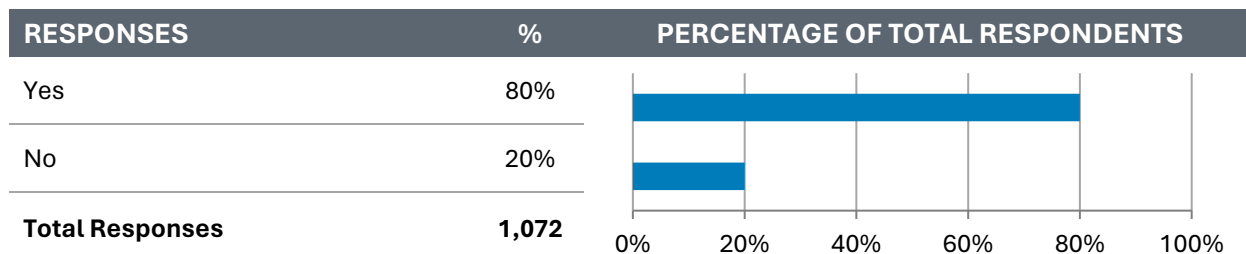
Activities that Are Most Effective in Reducing Overall Corruption	Rank	
	2024	2020
Effective government investigation and prosecution	▲ 1	2
Enhanced accountability and transparency in the public sector	▼ 2	1
Independent impartial judiciary	3	3
Corporate responsibility and accountability	4	4
Effective protections for whistleblowers	5	5
Public discussion, participation, and social policing	6	6

As in 2012, 2016, and 2020, this year’s top responses are “enhanced accountability and transparency in public sector” and “effective government investigation and prosecution.” As in 2020, “independent impartial judiciary” ranks third. Once again, “corporate responsibility and accountability” and “public discussion” are seen as less important.

Respondents continue on average to rank “whistleblower protections” second to last. Our observation in 2020 still appears to hold true: “This result is surprising, given that whistleblower protections in the context of corporate internal compliance programs are now seen as a standard element, and whistleblowers frequently contribute to the discovery of government corruption scandals.”

**Q13**

**Has your company’s management taken steps to protect the company from corruption risk?**



Responses are the same as in 2020, with 80% saying their companies’ management has taken steps to protect from corruption risk. This high percentage could still be an effect of the modification of laws in key jurisdictions whereby credit is given for compliance programs, as discussed in Question 7 above.

In 2024, as in 2020, about three quarters of respondents from private companies and 92% from publicly traded companies say management has taken steps to protect against corruption risk. When comparing respondents from local/regional companies with those from multinational companies, the responses are again almost identical to those in 2020, with 72% from local/regional companies saying yes and 91% from multinational companies saying yes. The disparity between the two categories of companies likely stems from the fact that multinationals, particularly those that are publicly traded, are often legally obligated to have such controls in place—for example, under the FCPA, publicly traded companies in the United States must comply with the law’s accounting provisions that require adequate internal controls and accurate books and records.

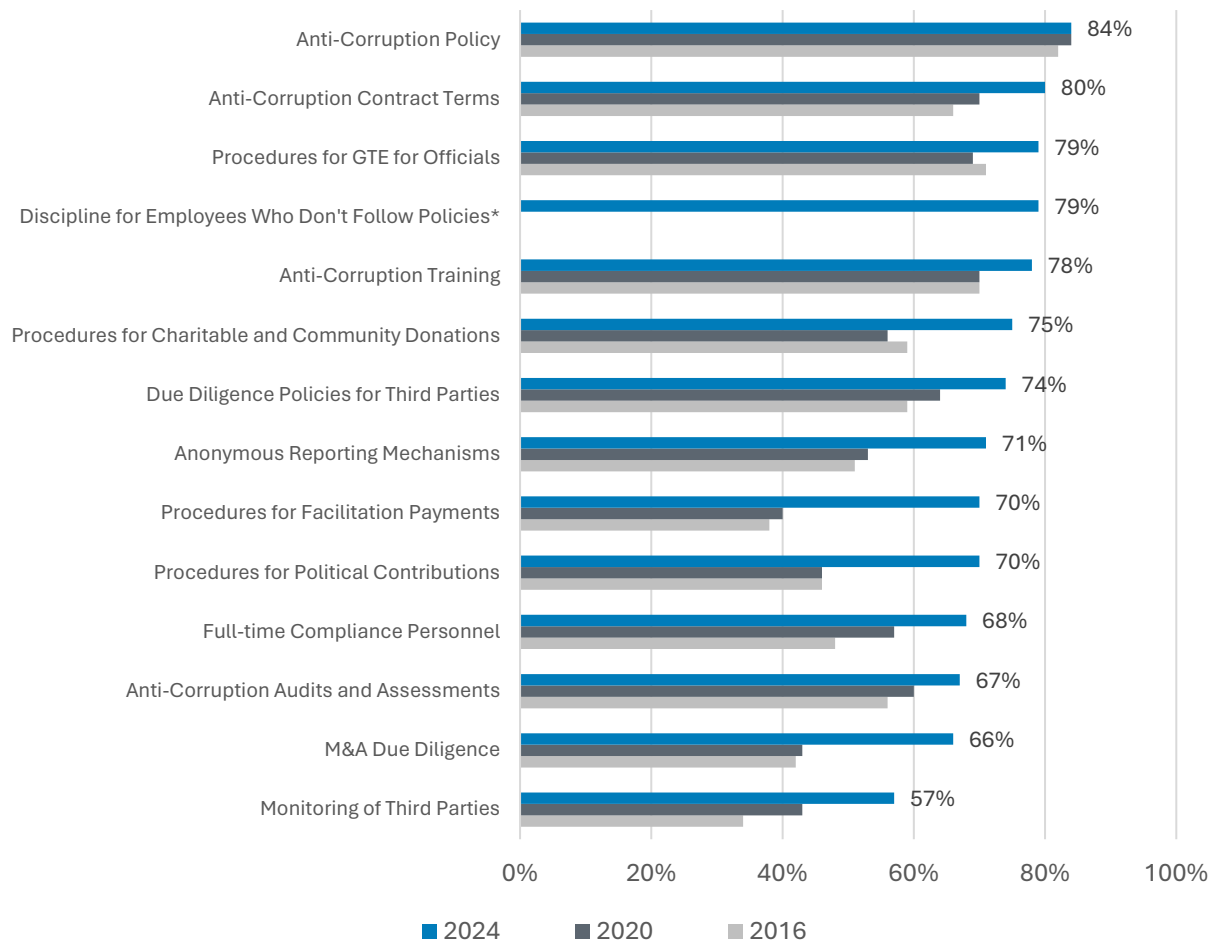
**PARTICIPANT COMMENT**

**“Efforts have already been made, and the current situation only requires maintenance of the implementations already carried out.”**

PARTICIPANT FROM BRAZIL

# COUNTRY-SPECIFIC COMPLIANCE PRACTICES

**Q14** Please indicate the level at which your company has implemented the following steps.



\*Not asked in 2016 and 2020

Anti-corruption policies, contract terms, training, and procedures for gifts, travel, and entertainment (in that order) still appear to be the most common compliance elements in the region, with close to 80% or more of respondents saying they work at companies with programs containing these features. This result is consistent with prior survey responses in both rank and percentage levels. Seventy-nine percent also say their companies discipline employees who do not follow policies — the first time we asked about this compliance element.

**PARTICIPANT COMMENT**

**“We already have a robust program set up.”**

PARTICIPANT FROM COLOMBIA



Perhaps more importantly, for the first time a second category of compliance elements has emerged as common in the region. Procedures for charitable and community donations, political contributions, and facilitating payments, as well as third party due diligence policies, anonymous reporting mechanisms, full-time compliance personnel, anti-corruption audits and assessments, and M&A due diligence are now being implemented by 65-75% of companies regionwide, versus 40-64% in 2020.

In particular, the growing efforts to address third party risk are notable. Regionwide, 74% of companies are adopting due diligence practices for third parties, compared to 64% in 2020. This suggests that requesting due diligence questionnaires, compliance certifications, and other forms of cooperation from consultants, agents, brokers, vendors, and other third parties to establish their ownership, reputation, and qualifications is now more commonplace, making these efforts easier. To the extent local third parties push back on such inquiries, companies now seem better positioned to stand their ground in requesting cooperation on these compliance procedures.

Other areas of substantive improvement include the implementation of anonymous reporting mechanisms (71% versus 53% in 2020), M&A due diligence (66% versus 43% in 2020) and procedures for facilitating payments (70% versus 40% in 2020). These shifts suggest that companies are working harder to protect themselves more comprehensively from bribery risks, perhaps as a result of a current lack of effective local enforcement regimes, highlighted in earlier questions.

The one exception to this positive trend appears to be monitoring of third parties: more companies are conducting such monitoring than in 2020 (57% versus 43%), but the practice lags when compared to others. Monitoring is a common weak spot in corporate compliance programs. Adding to the risk, U.S. enforcement officials have recently promoted monitoring strategies, including use of real-time data analytics, as a critical component of an effective compliance program.

## COUNTRY-SPECIFIC COMPLIANCE PROGRAM ENVIRONMENTS

When responses to Question 14 are reviewed on a country-by-country basis, some countries exhibit mature compliance environments, with companies having implemented many aspects of a best practices compliance program (Most Developed); some countries feature basic compliance elements but with room for further development (Developing); and some demonstrate nascent compliance environments (Least Developed) (see full data in Appendix 1).

Most Developed	Developing	Least Developed
Brazil Chile Colombia Guatemala* Mexico Panama* Peru Uruguay USA	Argentina* Bolivia* Costa Rica* Honduras	Dominican Republic Ecuador Paraguay Venezuela

\*Denotes the countries that have shifted categories since 2020.

Note that we did not include Nicaragua and El Salvador in this ranking given the small number of total responses from the country.

Since 2020, Guatemala has shifted from a compliance status of Developing to Most Developed, and Panama jumped from Least Developed to Most Developed, resulting in more than half of countries in the region having a Most Developed compliance climate. This category of countries commonly feature companies with sophisticated program elements like third-party due diligence, audits and assessments, and anonymous reporting mechanisms. We note that many of these countries also have developed local anti-corruption compliance communities of practitioners who regularly gather and communicate on benchmarking and best practices.

Argentina and Costa Rica both dropped since 2020 from Most Developed to Developing status. Bolivia joins the Developing category after being among the Least Developed environments in 2020.

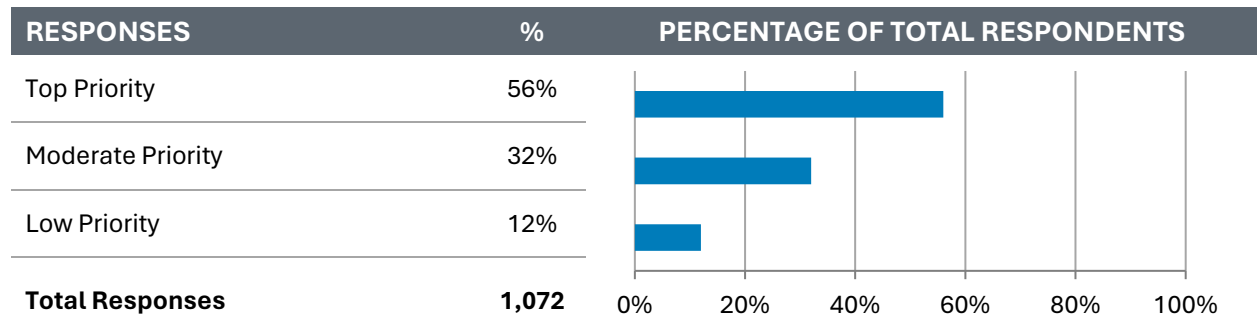
There are four countries in the Least Developed category this year, but they still show somewhat significant percentages (over 50%) adopting critical compliance elements. We noted in the 2020 survey report that a significant improvement across the region in adoption of compliance programs had occurred in the 2016-2020 period. The data this year suggests those improvements have now taken hold in a sustained way.

Country	Anti-corruption Training	Anti-corruption Policy	Due Diligence for Third Parties	Anti-corruption Contract Terms
<b>Argentina</b>	78%	80%	65%	72%
<b>Bolivia</b>	78%	83%	70%	87%
<b>Brazil</b>	85%	89%	71%	87%
<b>Chile</b>	75%	78%	73%	79%
<b>Colombia</b>	81%	90%	86%	86%
<b>Costa Rica</b>	88%	82%	71%	82%
<b>Dominican Republic</b>	47%	63%	73%	73%
<b>Ecuador</b>	54%	69%	62%	69%
<b>Guatemala</b>	75%	95%	60%	75%
<b>Honduras</b>	64%	71%	57%	54%

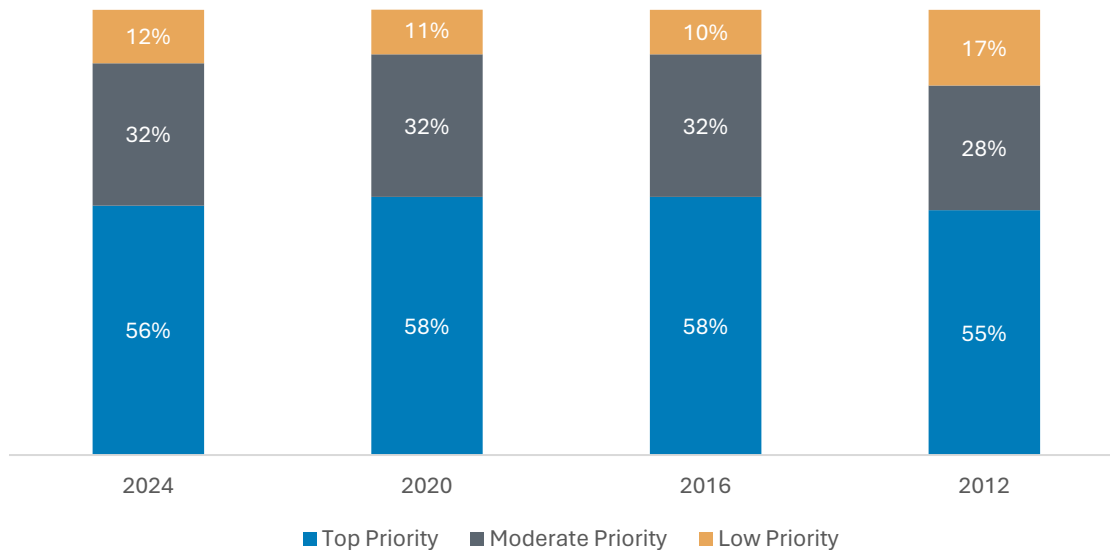
Country	Anti-corruption Training	Anti-corruption Policy	Due Diligence for Third Parties	Anti-corruption Contract Terms
<b>Mexico</b>	86%	95%	77%	84%
<b>Panama</b>	77%	86%	81%	78%
<b>Paraguay</b>	45%	45%	60%	55%
<b>Peru</b>	89%	89%	72%	94%
<b>United States</b>	96%	100%	96%	96%
<b>Uruguay</b>	72%	82%	80%	75%
<b>Venezuela</b>	58%	64%	60%	66%

# CORRUPTION AND COMPLIANCE OUTLOOK

## Q15 Where does dealing with corruption risk rank within the priorities of your company?



### YEAR OVER YEAR



Since we launched the survey in 2008, respondents have identified corruption as a significant obstacle in Latin America, as reflected in responses to Question 10. It is therefore no surprise that 56% of respondents regionwide say that dealing with corruption risk is a top priority — and that this year’s responses are generally consistent with prior surveys.

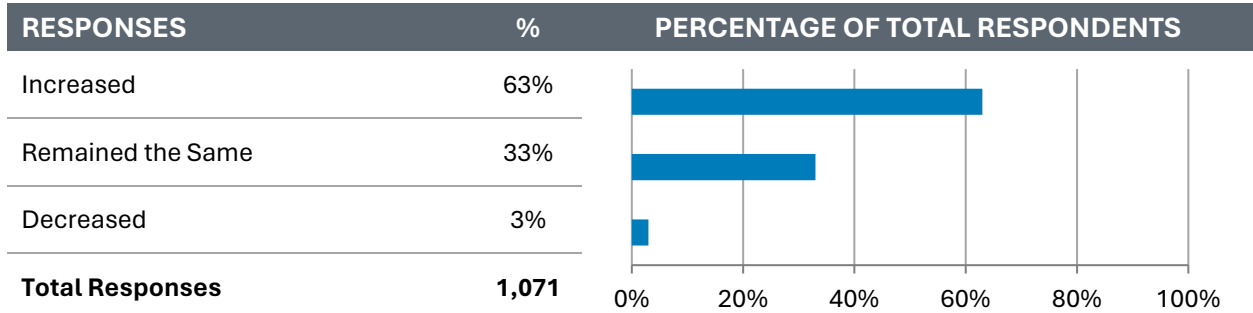
There also remains a gap in perceptions between multinational and local/regional company respondents. Almost three quarters (72%) of multinational company respondents describe dealing with corruption as a top priority, compared to only 43% of their local/regional company counterparts. That gap has slightly widened since 2016 and 2020, where about 65% of multinational respondents and 48% of local/regional company respondents said the same. Perhaps local/regional companies

assign lower levels of priority to corruption given that they perceive enforcement risk to be less acute. They might also experience less pressure from external private sector stakeholders, be it lenders, external auditors, or joint venture partners, to prioritize anti-corruption efforts.

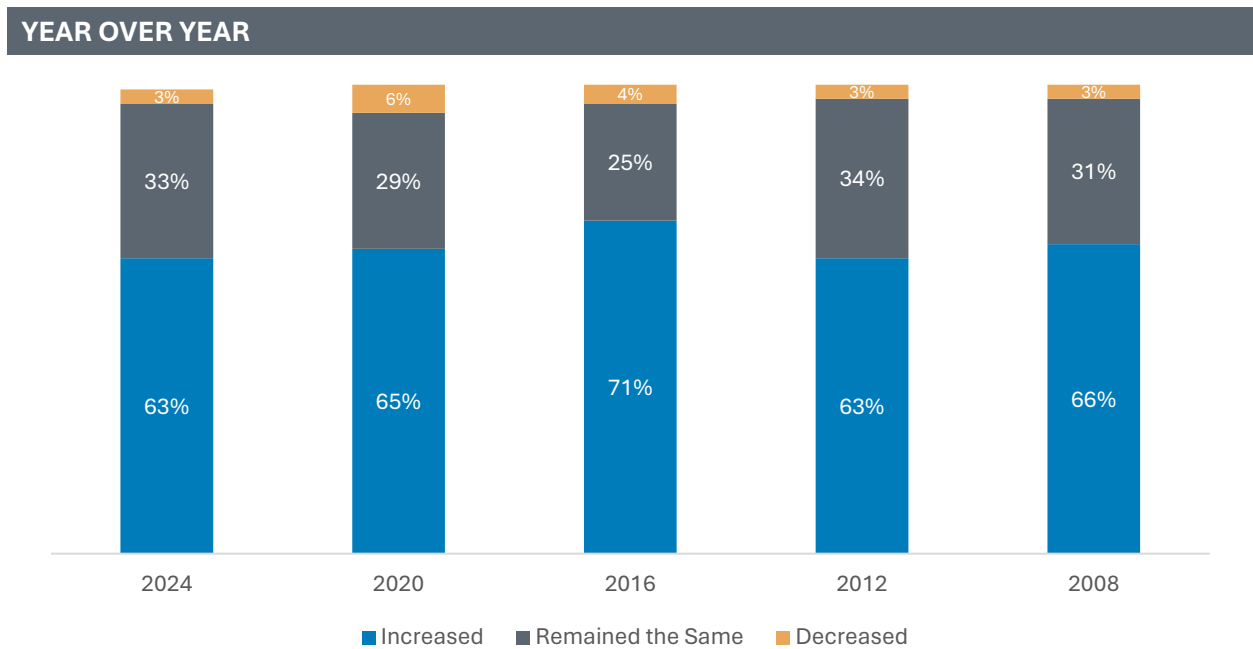
On a country-specific basis, responses to this question are mostly consistent with our 2020 survey. Some notable exceptions include:

- ▶ Colombia: down from 77% in 2020 to 64% in 2024 (stating “top priority”)
- ▶ Mexico: down from 74% in 2020 to 61% in 2024
- ▶ Paraguay: down significantly from 68% in 2020 to 37% in 2024
- ▶ Peru: down significantly from 73% in 2020 to 50% in 2024
- ▶ Dominican Republic: up from 36% in 2020 to 44% in 2024

**Q16** Has the importance of preventing corruption increased/decreased/ remained the same for your company over the last five years?



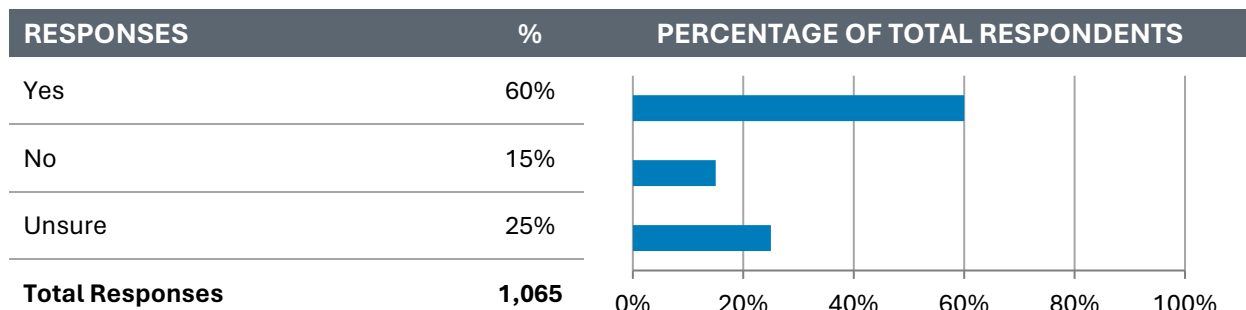
Similar to Question 15, responses to this question have generally remained consistent, reflecting a growing appreciation of corruption risk regionwide:



This consistency is also the case when analyzing responses by company type. Nearly three-quarters of multinational company respondents in 2024 and 2020 say the importance of preventing corruption has increased, compared to 55% of local/regional companies. Similarly, in both 2020 and 2024, about 72% of respondents from publicly traded companies say importance has increased, compared to 60% of respondents from non-publicly traded companies. The heightened focus from multinational and publicly traded company respondents should come as little surprise given that these organizations are often operating in numerous high-risk jurisdictions and generally seek to roll out global compliance programs on a consistent basis.

**Q17**

**In the next 12 months, do you believe your company will increase efforts and resources to improve awareness of and prevent corruption?**



Sixty percent of respondents regionwide say their company would increase efforts and resources to improve awareness of and prevent corruption, roughly flat from 2020 (we did not ask this question prior to 2020).

Responses are consistent with 2020 when company type is considered: about 68% of multinational and 55% of local/regional company respondents believe their companies will increase efforts. Again, the disparity is likely a result of multinational organizations’ increased risk and global compliance programs.

**PARTICIPANT COMMENT**

**“What is implemented works and there are no [additional] resources to invest in the next 12 months.”**

PARTICIPANT FROM BRAZIL

**Countries where companies are expected to increase efforts and resources to address corruption:**

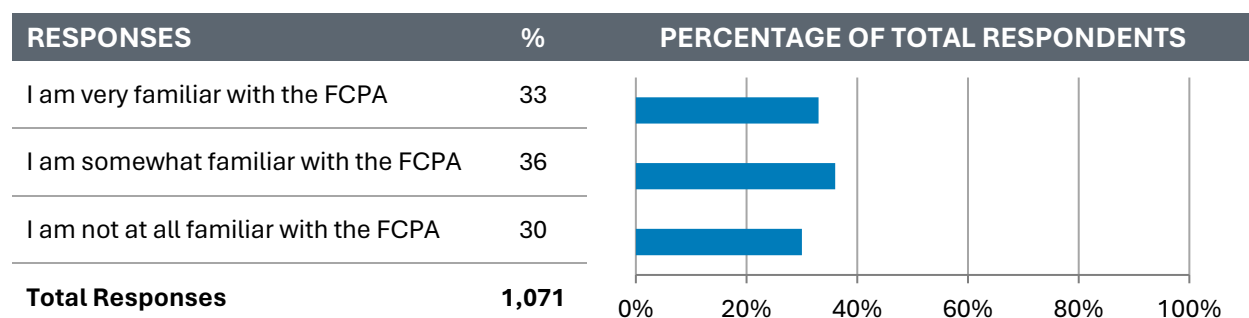
- ▶ Argentina: up from 40% in 2020 to 55% in 2024
- ▶ Chile: up from 70% in 2020 to 88% in 2024
- ▶ Ecuador: up from 44% in 2020 to 56% in 2024
- ▶ Panama: up from 53% in 2020 to 61% in 2024

**Countries where fewer companies are expected to increase efforts and resources to address corruption:**

- ▶ Guatemala: down from 78% in 2020 to 67% in 2024
- ▶ Mexico: down from 72% in 2020 to 56% in 2024
- ▶ Colombia: down from 73% in 2020 to 69% in 2024
- ▶ Peru: down from 73% in 2020 to 64% in 2024
- ▶ United States: down from 68% in 2024 to 55% in 2020
- ▶ Uruguay: down from 57% in 2020 to 44% in 2024

## AWARENESS OF ANTI-CORRUPTION LAWS

### Q18 Have you heard of the U.S. Foreign Corrupt Practices Act (FCPA)?



When compared to 2020, about the same breakdown in knowledge of the FCPA exists, with 69% saying they are somewhat or very familiar with the FCPA. The consistency of these results is perhaps reflective of the fact that FCPA enforcement in Latin America has continued to be a priority of the U.S. Department of Justice (DOJ) and Securities and Exchange Commission (SEC). More than half of FCPA corporate resolutions in 2022 and a third in 2023 involved improper conduct in Latin America. About 70% of FCPA fines and penalties collected in 2022 were attributed to settlements involving misconduct in the region.

Surprisingly, only 66% of respondents who work for affiliates of U.S. multinational companies say they are “very familiar” with the FCPA, while another 25% state they are “somewhat familiar.” And only 61% of respondents who work for companies that are publicly listed in the U.S. say they are “very familiar” with the FCPA, a response rate that has slightly decreased from 2020 (64%). A striking 14% of respondents from U.S. publicly traded companies say they are not familiar with the FCPA.

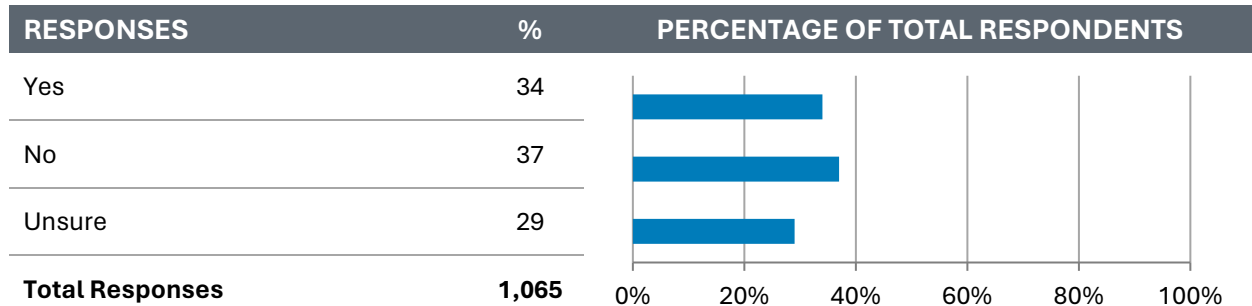
These results suggest a need for more training in Latin America on the FCPA with businesspeople who are (or could be) directly subject to the law. Employees of U.S. companies, for instance, can be subject to the FCPA no matter their nationality.

In contrast, respondents who work for affiliates of non-U.S. multinational companies have a notable level of knowledge about the FCPA, even though the jurisdictional link is not as clear. A third claim to be “very familiar” and another 42% claim to be “somewhat familiar.” This suggests that merely participating in the global economy via work at a multinational provides exposure to the FCPA and its compliance and enforcement elements.

Even respondents from local/regional companies appear to have, on average, some basic exposure to the FCPA. An impressive 62% say they are “very familiar” or “somewhat familiar” with the FCPA, up from 50% in 2020.



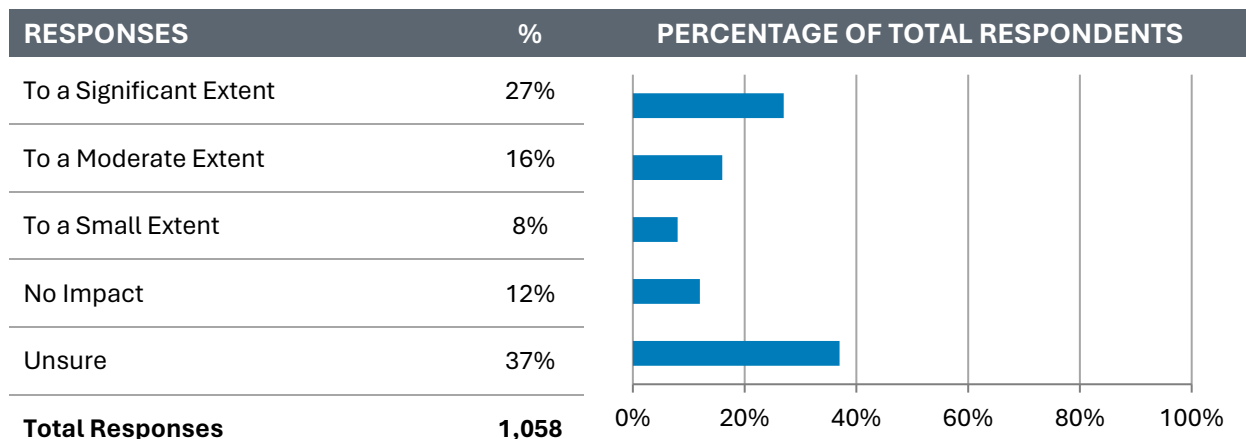
**Q19** Is your company subject to the FCPA?



Of the respondents whose companies are clearly subject to the FCPA — because their companies are publicly listed in the U.S. or are affiliates of U.S. multinational companies — 19% believe they are not subject to the law or are not sure. This represents a decrease from 2008, 2012, and 2020, suggesting that companies subject to the FCPA continue to do a better job of informing their employees about the law and its prohibitions and requirements. Still, the fact that one in five respondents in this category continue to lack FCPA awareness suggests there is more opportunity for education.

**Q20**

**To what extent has enforcement of the FCPA or other anti-corruption laws helped to mitigate the risk of corruption in or on behalf of your company?**



In a surprising development, and with the exception of Mexico, countries that have strengthened their laws have all seen a decrease since 2020 in those who say enforcement of the FCPA or other laws helped mitigate corruption risk:

- ▶ Argentina: 72% in 2020 down to 38% in 2024
- ▶ Brazil: 74% in 2020 down to 50% in 2024
- ▶ Chile: 59% in 2020 down to 47% in 2024
- ▶ Colombia: 55% in 2020 down to 54% in 2024
- ▶ Costa Rica: 52% in 2020 down to 39% in 2024
- ▶ Mexico: 68% in 2020 up to 70% in 2024
- ▶ Peru: 63% in 2020 down to 41% in 2024

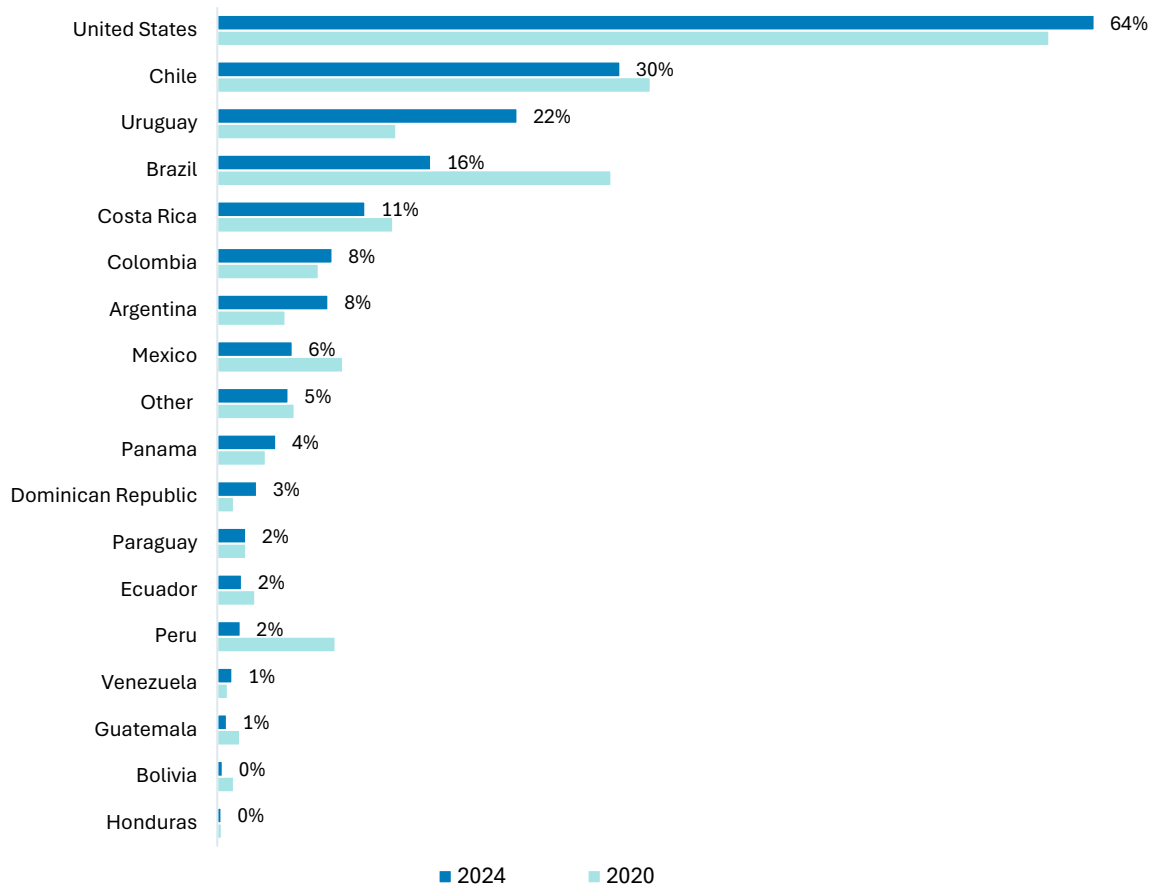
**PARTICIPANT COMMENT**

**“Anti-corruption laws are very important to implement in order to generate a safe business climate and equal conditions.”**

PARTICIPANT FROM PANAMA

**Q21**

**In your opinion, which of the following countries will lead the way in the next three years in enforcing their anti-corruption laws?**



Unsurprisingly, the United States remains on top when it comes to enforcing anti-corruption laws over the next three years, selected by 64% of respondents. Chile is again in second (30%), though this year Uruguay (22%) overtakes Brazil (16%) for third place. This result is yet another sign of Brazil’s lack of effective enforcement activity. Notably, less respondents selected Mexico this year than in 2020 (6% versus 9%).

**PARTICIPANT COMMENT**

**“The United States is always a reference on anti-corruption issues in the Americas. The regulatory and implementation mechanisms function in the USA.”**

PARTICIPANT FROM COSTA RICA

## APPENDIX 1: MEASUREMENT OF COMPLIANCE MATURITY IN VARIOUS MARKETS

Most Developed	Developing	Least Developed
Brazil Chile Colombia Guatemala* Mexico Panama* Peru Uruguay USA	Argentina* Bolivia* Costa Rica* Honduras	Dominican Republic Ecuador Paraguay Venezuela

\*Denotes the countries that have shifted categories since 2020.

Note that we did not include Nicaragua and El Salvador in this ranking given the small number of total responses from the country.

Most Developed (Scores generally above 75% benchmark)	
<p><b>BRAZIL</b></p> <ul style="list-style-type: none"> <li>▶ 85% conduct anti-corruption training</li> <li>▶ 89% have an anti-corruption policy</li> <li>▶ 87% apply anti-corruption contract terms</li> <li>▶ 87% have procedures for gifts, travel, and entertainment for officials</li> <li>▶ 80% have procedures for charitable and community donations</li> <li>▶ 80% have procedures for political contributions</li> <li>▶ 76% have procedures for facilitation payments</li> <li>▶ 83% implemented anonymous reporting mechanisms</li> <li>▶ 77% have full-time compliance personnel</li> <li>▶ 80% monitor third parties</li> <li>▶ 80% discipline their employees who don't follow policies</li> </ul>	<p><b>CHILE</b></p> <ul style="list-style-type: none"> <li>▶ 75% conduct anti-corruption training</li> <li>▶ 78% have an anti-corruption policy</li> <li>▶ 79% apply anti-corruption contract terms</li> <li>▶ 75% have procedures for charitable and community donations</li> <li>▶ 78% conduct anti-corruption audits and assessments</li> <li>▶ 82% implemented anonymous reporting mechanisms</li> <li>▶ 78% have full-time compliance personnel</li> <li>▶ 81% monitor third parties</li> <li>▶ 81% discipline their employees who don't follow policies</li> </ul>
<p><b>COLOMBIA</b></p> <ul style="list-style-type: none"> <li>▶ 81% conduct anti-corruption training</li> <li>▶ 90% have an anti-corruption policy</li> </ul>	<p><b>GUATEMALA</b></p> <ul style="list-style-type: none"> <li>▶ 75% conduct anti-corruption training</li> <li>▶ 95% have an anti-corruption policy</li> </ul>

Most Developed (Scores generally above 75% benchmark)	
<ul style="list-style-type: none"> <li>▶ 86% have due diligence policies for third parties</li> <li>▶ 86% apply anti-corruption contract terms</li> <li>▶ 82% have procedures for gifts, travel, and entertainment for officials</li> <li>▶ 88% monitor third parties</li> <li>▶ 88% discipline their employees who don't follow policies</li> </ul>	<ul style="list-style-type: none"> <li>▶ 75% apply anti-corruption contract terms</li> <li>▶ 85% have procedures for gifts, travel, and entertainment for officials</li> <li>▶ 79% have procedures for charitable and community donations</li> <li>▶ 85% have procedures for political contributions</li> <li>▶ 75% have procedures for facilitation payments</li> <li>▶ 80% implemented anonymous reporting mechanisms</li> <li>▶ 84% monitor third parties</li> <li>▶ 84% discipline their employees who don't follow policies</li> </ul>
<p><b>MEXICO</b></p> <ul style="list-style-type: none"> <li>▶ 86% conduct anti-corruption training</li> <li>▶ 95% have an anti-corruption policy</li> <li>▶ 77% have due diligence policies for third parties</li> <li>▶ 84% apply anti-corruption contract terms</li> <li>▶ 93% have procedures for gifts, travel, and entertainment for officials</li> <li>▶ 86% have procedures for charitable and community donations</li> <li>▶ 86% have procedures for political contributions</li> <li>▶ 86% have procedures for facilitation payments</li> <li>▶ 86% conduct M&amp;A due diligence</li> <li>▶ 86% implemented anonymous reporting mechanisms</li> <li>▶ 77% have full-time compliance personnel</li> <li>▶ 89% monitor third parties</li> <li>▶ 89% discipline their employees who don't follow policies</li> </ul>	<p><b>PANAMA</b></p> <ul style="list-style-type: none"> <li>▶ 77% conduct anti-corruption training</li> <li>▶ 86% have an anti-corruption policy</li> <li>▶ 81% have due diligence policies for third parties</li> <li>▶ 78% apply anti-corruption contract terms</li> <li>▶ 84% have procedures for charitable and community donations</li> <li>▶ 81% monitor third parties</li> <li>▶ 81% discipline their employees who don't follow policies</li> </ul>
<p><b>PERU</b></p> <ul style="list-style-type: none"> <li>▶ 89% conduct anti-corruption training</li> <li>▶ 89% have an anti-corruption policy</li> </ul>	<p><b>URUGUAY</b></p> <ul style="list-style-type: none"> <li>▶ 82% have an anti-corruption policy</li> </ul>

Most Developed (Scores generally above 75% benchmark)	
<ul style="list-style-type: none"> <li>▶ 94% apply anti-corruption contract terms</li> <li>▶ 83% have procedures for gifts, travel, and entertainment for officials</li> <li>▶ 83% have procedures for charitable and community donations</li> <li>▶ 83% conduct anti-corruption audits and assessments</li> <li>▶ 89% monitor third parties</li> <li>▶ 89% discipline their employees who don't follow policies</li> </ul>	<ul style="list-style-type: none"> <li>▶ 80% have due diligence policies for third parties</li> <li>▶ 75% apply anti-corruption contract terms</li> <li>▶ 80% have procedures for gifts, travel, and entertainment for officials</li> <li>▶ 75% have procedures for charitable and community donations</li> <li>▶ 76% implemented anonymous reporting mechanisms</li> <li>▶ 76% monitor third parties</li> <li>▶ 76% discipline their employees who don't follow policies</li> </ul>
<p><b>UNITED STATES</b></p> <ul style="list-style-type: none"> <li>▶ 96% conduct anti-corruption training</li> <li>▶ 100% have an anti-corruption policy</li> <li>▶ 96% have due diligence policies for third parties</li> <li>▶ 96% apply anti-corruption contract terms</li> <li>▶ 100% have procedures for gifts, travel, and entertainment for officials</li> <li>▶ 94% have procedures for charitable and community donations</li> <li>▶ 88% have procedures for political contributions</li> <li>▶ 92% have procedures for facilitation payments</li> <li>▶ 94% conduct M&amp;A due diligence</li> <li>▶ 84% conduct anti-corruption audits and assessments</li> <li>▶ 94% implemented anonymous reporting mechanisms</li> <li>▶ 92% have full-time compliance personnel</li> <li>▶ 92% monitor third parties</li> <li>▶ 92% discipline their employees who don't follow policies</li> </ul>	

Developing (Scores generally consistent with 75% benchmark)	
<p><b>ARGENTINA</b></p> <ul style="list-style-type: none"> <li>▶ 78% conduct anti-corruption training</li> <li>▶ 80% have an anti-corruption policy</li> <li>▶ 76% implemented anonymous reporting mechanisms</li> <li>▶ 85% monitor third parties</li> <li>▶ 85% discipline their employees who don't follow policies</li> </ul>	<p><b>BOLIVIA</b></p> <ul style="list-style-type: none"> <li>▶ 78% conduct anti-corruption training</li> <li>▶ 83% have an anti-corruption policy</li> <li>▶ 87% apply anti-corruption contract terms.</li> <li>▶ 78% monitor third parties</li> <li>▶ 78% discipline their employees who don't follow policies</li> </ul>

Developing (Scores generally consistent with 75% benchmark)	
<p><b>COSTA RICA</b></p> <ul style="list-style-type: none"> <li>▶ 88% conduct anti-corruption training.</li> <li>▶ 82% have an anti-corruption policy</li> <li>▶ 82% apply anti-corruption contract terms</li> <li>▶ 76% implemented anonymous reporting mechanisms</li> </ul>	<p><b>HONDURAS</b></p> <ul style="list-style-type: none"> <li>▶ 77% conduct M&amp;A due diligence</li> <li>▶ 86% monitor third parties</li> <li>▶ 86% discipline their employees who don't follow policies</li> </ul>

Least Developed (Scores generally below 75% benchmark)	
<p><b>DOMINICAN REPUBLIC</b></p> <ul style="list-style-type: none"> <li>▶ Companies' results are below 75% benchmark in all surveyed categories</li> </ul>	<p><b>ECUADOR</b></p> <ul style="list-style-type: none"> <li>▶ Companies' results are below 75% benchmark in all surveyed categories</li> </ul>
<p><b>PARAGUAY</b></p> <ul style="list-style-type: none"> <li>▶ Companies' results are below 75% benchmark in all surveyed categories</li> </ul>	<p><b>VENEZUELA</b></p> <ul style="list-style-type: none"> <li>▶ Companies' results are below 75% benchmark in all surveyed categories</li> </ul>

## APPENDIX 2: METHODOLOGY AND DEMOGRAPHICS

From October 30 through November 20, 2023, Miller & Chevalier joined with 14 Latin American partner firms representing 18 countries to distribute a survey via email to individuals working at a broad cross section of U.S. and Latin American companies. The survey, available in English, Spanish, and Portuguese, was completed by 1,070 respondents.

Participating law firms were [Albagli Zaliansnik Abogados](#) (Chile), [Alta QIL+4 Abogados](#) (Guatemala), [Estudio Beccar Varela](#) (Argentina), [BLP Legal](#) (Costa Rica and El Salvador), [Brigard & Urrutia Abogados](#) (Colombia), [Bustamante Fabara](#) (Ecuador), [CPB Abogados](#) (Peru), [Demarest Advogados](#) (Brazil), [Ferrere Abogados](#) (Bolivia, Paraguay and Uruguay), [García & Bodán](#) (Honduras and Nicaragua), [Headrick Rizik Álvarez & Fernández](#) (Dominican Republic), [Leña Abogados](#) (Venezuela), [LOVILL](#) (Panama), [Miller & Chevalier](#) (United States), and [Von Wobeser y Sierra](#) (Mexico).

More than 30 industries were represented in the survey, with the highest proportion of participants working in utilities (13%), financial services or fintech (6%), information technology or software (5%), consumer products (5%), banking (5%), construction (5%) or energy (5%).

Leading titles and roles participating in the survey included Compliance Officer (14%), Office/Management Leader (10%), and Finance Professional (8%).

Fifty-seven percent of the participating companies were local or regionally based while 19% were affiliates of non-U.S. multinational companies, 14% were headquarters of a multinational company and the remaining 11% were affiliates of U.S. multinational companies. Thirty-one percent were publicly listed in headquarter countries, and 20% were publicly listed in the U.S.

Participation by country included:

Country	Count
Brazil	239
Panama	96
Uruguay	95
Colombia	80
Chile	77
Argentina	72
United States	56
Mexico	54
Venezuela	54
Ecuador	43
Dominican Republic	36
Bolivia	29
Paraguay	27



Country	Count
Guatemala	24
Costa Rica	23
Peru	22
Other	20
Honduras	18
Nicaragua	3
El Salvador	2
<b>Total</b>	<b>1,070</b>