

Articles + Publications | February 2, 2026

# Combating Bribery and Corruption Abroad: Troutman's Guide to the FCPA and Beyond

## WRITTEN BY

Peter E. Jeydel | Abigail A. Hazlett | Jay A. Dubow | Anthony J. Osticco | Isabela P. Herlihy

---

Bribery and corruption are illegal. What does that mean in practice? Various countries have enacted laws to combat corruption, including India's Prevention of Corruption Act, the UK Bribery Act of 2010, and the Canadian Corruption of Foreign Public Officials Act. In the U.S., the Foreign Corrupt Practices Act (FCPA) remains a critical and often challenging compliance requirement for U.S. and many non-U.S. companies that do business abroad. In 2025, the Trump administration issued an executive order and subsequent updated guidelines that changed the U.S. Department of Justice's (DOJ) historical approach to FCPA enforcement, creating uncertainty for how companies should consider FCPA risk.

Troutman Pepper Locke's White Collar Litigation + Investigations team has prepared a concise guide, *Combating Bribery and Corruption Abroad: What You Need to Know to Protect Your Business*, to help you navigate these complex regulations. Learn the FCPA's two main provisions covering anti-bribery and financial record-keeping and controls, understand which businesses the law applies to and common liability theories, discover current DOJ and SEC enforcement priorities, and implement practical compliance strategies including risk assessments, third-party vetting, and internal controls. Most importantly, know exactly what to do if you suspect a violation.

## RELATED INDUSTRIES + PRACTICES

- Foreign Corrupt Practices Act (FCPA)
- White Collar Litigation + Investigations