



Business Information  
In A Global Context

*“Very useful and informative. Good insight into trends particularly the regulators perspective. This helped to put other presentations into perspective”.*

Dianne Thomas, VP International Compliance, NBC Universal  
European Anti-Corruption, Frankfurt, January 2009

9<sup>th</sup> European Forum on

# ANTI-CORRUPTION

*Reducing the Risks of Improper Payments in an Era of Heightened Domestic and International Enforcement*

20–21 October 2010 | Crowne Plaza Hotel, Paris-République, France

Up to  
20.75 CPD

## ENFORCEMENT UPDATE & IN-HOUSE INSIGHTS FROM:

Cour de Justice de la République (France)  
U.S. Department of Justice (USA)  
Cour d’Appel in Paris (France)  
Republic and Canton of Geneva (Switzerland)  
Organisation for Economic Co-operation and Development (OECD)  
International Chamber of Commerce (ICC) (Belgium)  
LegalEdhec Research Center, EDHEC Business School (France)  
The Mouvement des Entreprises de France (MEDEF)  
Trace International (USA)  
Baker Hughes Africa Region Office (France)  
Schering-Plough Pharmaceuticals (Italy)  
Siemens AG (Germany)  
Transparency International (France)  
Thales Group (France)  
EADS (France)  
Alstom (France)  
GE (France)  
Orange-France Telecom Group (France)  
Cisco International Limited (UK)  
Technip (France)

## GET THE LATEST INSIGHTS ON:

- Recent anti-corruption enforcement cases in France and their impact on corporate compliance
- Preparing for increased and relentless FCPA enforcement in Europe
- The nuts and bolts of the extraterritorial reach and enforcement of the UK Bribery Act
- Multi-jurisdictional prosecutions and settlements: pros and cons of plea bargaining in France
- Turning your anti-corruption compliance obligations into a corporate asset
- Knowing your company’s third parties and understanding where the company’s liability starts and ends

## PRACTICAL AND INTERACTIVE CONFERENCE WORKSHOPS

Tuesday 19 October 2010

**A** Fundamentals of Anti-Corruption Compliance: Intersection and Interaction between the Foreign Corrupt Practices Act (FCPA) and the UK Anti-Bribery Act

Friday 22 October 2010

**B** Ensuring Compliance of Commercial Intermediaries and Joint Venture Partners to Minimise Third Party Liability Risk

– see inside for full details

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# ARE YOU PREPARED FOR RELENTLESS ENFORCEMENT AGAINST CORRUPT PRACTICES?

12

While the U.S. Government continues to enforce the Foreign Corrupt Practices Act (“FCPA”) vigorously and globally, European regulators and prosecutors are cracking down on corruption more than ever before. In France, recent cases involving French companies such as Total SA, Thales, the Frigates of Taiwan and individuals in France confirm the trend. In the UK, the new Bribery Act provides a new and comprehensive set of bribery offences which will enable courts and prosecutors to respond more effectively to bribery at home or abroad. Finally, the growing international cooperation among agencies to enforce various anti-corruption laws shows that there is nowhere to hide for non-compliant companies. Your company’s best defence is to implement and monitor an adequate compliance programme to detect, prevent and proactively remediate potential violations.

C5’s European Forum on Anti-Corruption has again assembled an exceptional panel of leading international corporate ethics and compliance executives, lawyers, investigators, forensic experts and top government officials from the U.S. and Europe, who will provide the latest practices to help you minimise your company’s risk in an era of heightened scrutiny and enforcement. Take this opportunity to hear from this unparalleled panel of experts in the field and network with peers and colleagues who share similar concerns. This year’s agenda will include the latest information on:

- **Changes** you need to make to your **compliance policy** as a result of recent high profile cases against individuals and companies
- Conducting **risk assessments to identify red flags** and your company’s risk exposures
- Working with **compliance monitors** harmoniously and avoiding an adversarial relationship
- **Protecting advice** given by in-house lawyers to employees in relation to compliance issues
- Pros and cons of **plea bargaining** in France

- Drafting and implementing **robust anti-corruption compliance programmes** to meet U.S. and European regulatory standards
- Overcoming the **data protection challenges** associated with document requests in FCPA enquiries
- What to look for in a target’s anti-corruption compliance
- How internal compliance departments contribute to the **company’s strategy and performance**
- Exploring effective anti-corruption clauses that leading companies incorporate into all **contracts with agents and intermediaries**



You will also have the opportunity to add practical value to your experience when you attend the optional interactive workshops:

Tuesday 19 October 2010

**Fundamentals of Anti-Corruption Compliance: Intersection and Interaction between the Foreign Corrupt Practices Act (FCPA) and the UK Anti-Bribery Act**

Friday 22 October 2010

**Ensuring Compliance of Commercial Intermediaries and Joint Venture Partners to Minimise Third Party Liability Risk**

Participants will also receive a comprehensive set of written materials prepared by the speakers specifically for the conference. These are invaluable reference materials which you will use again and again, long after the conference is over.

Be where your industry and peers will be on the 20-21 October 2010.

Seats at this unique event are sure to go quickly. Don’t delay, register today by calling +44 (0) 20 7878 6888, by faxing your registration form to +44 (0) 20 7878 6896 or by registering online at [www.C5-Online.com/AntiCorruption](http://www.C5-Online.com/AntiCorruption)

*“Very useful – great opportunity to be up to date with today’s challenges in the field”.*

Olivier Basset, Compliance Manager, GDF Suez, Anti-Corruption Boot Camp, Paris, September 2008

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For more information about this program or our global portfolio, please contact:

Jonathan Price on +44 (0)20 7878 6907  
or email [j.price@C5-Online.com](mailto:j.price@C5-Online.com)

## WHO SHOULD ATTEND?

- Ethics & Compliance Officers
- Vice Presidents and Directors of:
  - Corporate Responsibility
  - International Contracts
  - Corporate Compliance
  - Legal Affairs
  - Internal Audit
  - Governance & Sustainable Investment
  - Business Conduct
- General Counsel
- Private practice lawyers specialising in:
  - Corporate Governance
  - International Regulation & Compliance
  - White Collar Crime
  - Investigations
- Accounting & Consulting Firms
  - Investigations & Forensic
  - Transactions

“Very good conference. Probably the best for European coverage I have attended.  
The level of detail is exactly right”.

Julie Fenton, Compliance Manager, Rolls Royce Plc, European Anti-Corruption, Frankfurt, January 2008

PRE-CONFERENCE WORKSHOP | TUESDAY 19 OCTOBER 2010  
1:00 p.m. to 4:30 p.m. (Registration Opens at 12:30 p.m.)

## A Fundamentals of Anti-Corruption Compliance: Intersection and Interaction between the Foreign Corrupt Practices Act (FCPA) and the UK Anti-Bribery Act

*Philip Urofsky*

Partner, Shearman & Sterling LLP (USA)

*Richard Kelly*

Partner, Shearman & Sterling LLP (UK)

*This highly rated pre-conference workshop is designed to provide you with a comprehensive introduction to FCPA and cover all the bases: the anti-corruption and anti-bribery elements of the statute, internal controls and accounting requirements, and intersections with Sarbanes-Oxley and SEC reporting requirements. This year, the workshop will include a detailed overview of the main provisions of the new UK Bribery Act with a focus on how both Acts contrast and compare. This interactive and practical working session will discuss core issues related to the statute, focus on the “nuts & bolts” of both Acts and provide you with a foundation for dealing with compliance day-to-day issues, including:*

- Who is covered by the FCPA?
  - what constitutes a “instrumentality”
  - what constitutes a “government owned entity”
- The 4 new bribery offences: “offering or giving bribes”, “soliciting or receiving bribes”, “bribing a foreign public official (FPO)”, “failure to prevent bribery by commercial organisation”
- Scope and application of general bribery offences/foreign public officer (FPO) offence
  - what/who is covered?
  - Acts/omissions taking place in the UK
  - Acts/omissions outside the UK but by persons with a “close connection” to the UK

- Scope and application of corporate offence
  - UK corporations and partnerships
  - foreign corporations carrying on business in the UK
  - extraterritorial reach: persons performing services for or on behalf of commercial organisation
- Corruption risk generators and potential pitfalls you should be aware of
- Permissible and impermissible payments
  - anything “of value”
  - facilitating payments: limits on “grease”
  - political contributions
  - charitable contributions
- What constitutes activity deemed to “obtain or retain business”?
- Reasonable and bona fide expenses under the statute
- “Adequate procedures”
  - what are they?
  - Are they sufficient to defend companies?
- What triggers government anti-bribery investigations?
- Books and records requirements under the FCPA and the UK Bribery Act
- The intersection of Sarbanes-Oxley and FCPA
- Internal controls of inaccuracies and public disclosure under the FCPA and the UK Bribery Act
- Fundamentals of an FCPA compliance programme
  - what do you need to add into your FCPA compliance programme to make it compliant with the UK Bribery Act?

### WEDNESDAY 20 OCTOBER 2010

8:00 Registration and Coffee

8:45 Opening Remarks and Welcome from Co-chairs

*Dominique Lamoureux*

Vice President, Ethics and Corporate Responsibility  
Thales Group (France)

*Carolyn Lindsey*

Director, Member Services  
Trace International (USA)

9:00 Opening Keynote Address: FCPA Enforcement Priorities at the U.S. Department of Justice

*Greg D. Andres*

Deputy Assistant Attorney General, Criminal Division  
U.S. Department of Justice Washington, DC

9:45

### Anti-Corruption Compliance and Enforcement in France in Light of Recent Cases

*Yves Charpenel*

Avocat Général à la Cour de Justice de la République  
(France)

*Stéphane Bonifassi*

Partner  
Lebray & Associés (France)

- The government enforcement priorities after the GRECO evaluation report
- Lessons the business community should learn from the recent explosion of anti-corruption enforcement cases involving Total, Thales, Karachigate etc.
- Government agencies involved in investigations and prosecutions – what is the scope and extent of their powers?
- Anticipated effect of the “reforms” of the French Code of Criminal Procedure in the context of international investigations for corruption allegations

10:45 Morning Refreshments

11:15 **The UK Bribery Act: Status of Implementation and Key Enforcement Priorities**

*John Rupp*

Partner

Covington & Burling (UK)

*Matthew Cowie*

Former Senior Prosecutor, Serious Fraud Office

Counsel, Skadden, Arps, Slate, Meagher & Flom LLP (UK)

- The extraterritorial reach of the UK Bribery Act – who is covered and who is not?
  - UK-based persons and natural persons with a “close connection” to the UK
  - foreign companies with business in the UK
  - what is the status of non-UK companies that do not do business in the UK?
- New offences: What do “offering or giving bribes” and “soliciting bribes” mean in a local and international context?
- How does the UK Bribery Act define foreign public official? Government entities, state-owned entities, natural persons: what are the criteria?
- Corporate offence for failure to prevent bribery: Elements of a potential criminal liability
- Defining the concept of “adequate procedures” – how to measure the adequacy of companies procedures
- The new UK Government’s priorities in enforcing the Act domestically and abroad
  - what agencies are involved
  - companies’ defence and mitigating factors
- Who within an organisation wears the hat of the “Senior Officer”?
- Current status of anti-corruption investigations in the UK

12:30 Networking Luncheon

1:45 **Minimising Risks Arising From Offering or Accepting Gifts, Corporate Hospitality, Entertainment, Travelling, Sponsorship and Marketing on a National and Global Level**

*Jean Monville*

Chairman of the Guidelines and International Deontology Committee, MEDEF (France)

- Best practices in avoiding the risk of receiving, promising or giving improper payments hidden within marketing or sponsorship initiatives
- How the new guidance in relation to corporate hospitality will impact the preparation of global policies
- What is the definition of a “gift” across cultural backgrounds?
- Avoiding common pitfalls associated with gifts, hospitality, sponsoring, donations and marketing
- Defining the limits when hosting, entertaining and lodging foreign officials

- Distinction between legitimate and corrupt corporate hospitality
- Managing and controlling gifts received at company level within the framework of an internal gifts and entertainment policy: case-by-case analysis vs. standardised approach
- Drawing a clear line between a gift and a bribe in the light of recent cases
- Fostering clients’ relationships through sponsorship or marketing initiatives while staying compliant

2:30

**Managing Document Collection, Review and Disclosure in Anti-Corruption Investigations While Addressing Data Protection Issues**

*Susanne Gropp-Stadler*

Head of Compliance Legal

Siemens AG (Germany)

*Rafik E. Abboud*

Chief Executive Officer

H7b1 Legal Technologies – Europe

*David S. Lovello*

Partner

Step toe & Johnson LLP (UK)

- Understanding what is typically requested in an FCPA investigations: data preservation, collection, processing, review, production, reporting
- Discussing key corporate obligations, challenges and best practices on data protection
- Establishing and preserving privileges
- FCPA versus UK Anti-Bribery: differences in scope of review / production
- Overcoming common challenges including data accessibility, cost mitigation and other compliance challenges
- Benefits of a proactive preparation in order to mitigate costs of potential investigations
- Exploring the possibility to proactively cooperate with data protection authorities
- Lessons learned from corporations which have gone through FCPA investigations

3:30

Afternoon Refreshments

4:00

**Managing Different Approaches to the Legal Professional Privilege (LPP) During Internal Investigations**

*Isabelle M. Hautot*

GC International Expertise & Group Litigation

Orange-France Telecom Group (France)

*Jean-Claude Najjar*

General Counsel France

Senior Counsel & Chief Compliance Officer

Capital EMEA, GE (France)

- Current status of the protection of legal professional privilege (LPP) in Europe
  - identifying which countries recognise the protection to in house counsels and those that don’t
  - understanding the scope and extent of the protection granted

- To what extent do privilege issues shape an investigation?
- What is protected by LPP investigations conducted within the European community?
- Recent developments in the *Akzo Nobel* case and its implications on the role of in-house lawyers in internal investigations
  - should in-house lawyers attend meetings or respond to request for information within the framework of an investigation?
- Consequences of correspondence with in-house counsel and other company personnel
- How to protect advice given by in-house lawyers to employees in relation to compliance issues
- Examining the privilege attached to documents uncovered in investigations and correspondence with third parties

5:00 Conference Adjourns for the Day

Networking Reception  
Hosted by:

**H7b1**  
Litigation Technology Services - Europe

THURSDAY 21 OCTOBER 2010

8:30 Registration and Coffee

8:45 Opening Remarks from Co-chairs

9:00 Multi-Jurisdictional Prosecutions and Settlements:  
Exploring the Practice of Negotiated Guilty Pleas  
in Some European Countries

*Yves Charpenel*

Avocat Général à la Cour de Justice de la République  
(France)

*Catherine Pierce*

Board Member of Transparency International  
(France)

*François Franchi*

Conseiller à la Cour d'Appel de Paris

*Jean-Bernard Schmid*

Deputy Prosecutor General  
Investigating Magistrate, Republic and Canton  
of Geneva (Switzerland)

*Christophe Ayela*

Partner  
Mayer Brown (France)

- Examining the arguments for and against a negotiated guilty plea in France in a context where compliance practices are increasingly global
- To what extent is plea bargaining being phased in Europe through the compliance system with European competition law in light of the EU Commission *DRAM* Settlement?
- Examining the scope of the changes to the French Criminal Procedure Law if plea bargaining were to be considered

- specific prosecuting policies/procedures that may conflict with the concept

- Understanding the position of investigating judges
- Real benefits and drawbacks for European companies
- Lessons learned from Germany in the Siemens settlement and from current practices in Switzerland
- Who do you bargain with? – who takes the leading role among the agencies involved?
- How strong and sustainable are plea bargains? Ensuring that they are not easily challenged the courts
- Consequences in France of settlements done by French companies or individuals outside France
  - will the company pay twice for the same conduct?

10:15 Morning Refreshments

10:45 Selecting and Working with External  
Compliance Monitors in the Best Interests  
of the Company

*F. Joseph Warin*

Partner, Gibson, Dunn & Crutcher (USA)

- Rules and practices governing the appointment of the compliance monitor in a European context
  - can the German model be implemented in France and across Europe?
- Do companies have options regarding the appointment of a compliance monitor?
- How do companies participate in defining the scope of the compliance monitors?
- How to work with a compliance monitor to avoid an adversarial relationship
- Ensuring that the compliance monitor understands the company's business, practices and culture
- Ensuring that the compliance monitor's reporting complies with data protection laws
- How to defend and protect the company's interests when working with monitors
- How the compliance monitor should interact with the company's outside counsel

11:30 Developing and Implementing a Value-Based  
Anti-Corruption Compliance Programme that  
Reduces the Risk of Bribery or Corruption

*Sylvie Kandé de Beaupuy*

Group Compliance Officer  
Technip (France)

*Jean-Daniel Lainé*

SVP Ethics & Compliance  
Alstom (France)

*Lyn Cameron*

Director, Ethics & Investigations (Global)  
Governance, Risk and Controls  
Cisco International Limited (UK)

- Resources, tools and techniques leading companies are using to implement and maintain global anti-corruption compliance programmes

- What type of compliance programme does a company need?
- Overcoming common challenges multinational organisations face when creating, implementing and monitoring a compliance programme
- Determining whether or not to tailor the compliance programme to every country a multinational operates in
  - coordinating FCPA compliance with local anti-bribery laws and the new UK Bribery Act
  - dealing with different levels of compliance required by different countries
- Which department is responsible for the development and implementation of the compliance programme: legal, compliance or internal audit?
- Reasons for choosing a particular organisation – as opposed to another – to run a compliance programme
- Exploring organisational models that work: integrated vs. non integrated approaches
  - where are the risks of overlapping? How to address those risks
  - key considerations when adopting a structure that manages coordination among the functions independence of functions, non ambiguous reporting lines, getting the senior management to set the tone
  - pros and cons of creating a special unit to deal with corruption
- How companies under investigations or convicted for FCPA violations implement and monitor a compliance programme
- Overcoming challenges of cultural sensibility likely to impact on the implementation of the compliance programme
- Training
  - ensuring the efficacy of training programmes through the proper selection of staff, strategy, location, and timing
  - how to develop a training curriculum that reflects your industry and company's risk area
- Ensuring practical compliance through effective monitoring: constant vigilance vs. risk prioritisation and effective training
- Auditing compliance and field testing
- Keeping your programme up-to-date following regulatory and business practice change
- Making the best use of outside counsel and advisors in designing and implementing your programme

1:00 **Networking Luncheon**

2:15 **Phase 3 of Monitoring the Implementation of the OECD Convention in 2010**

*Nicola Bonucci*  
 Legal Counsel, Organisation for Economic Co-operation and Development (France)

2:45 **Promoting Anti-Corruption Compliance Awareness – Turning your Anti-corruption Compliance Obligations into a Corporate Asset**

*Dr. Christophe Roquilly*  
 Professor and Director of LegalEdhec Research Center EDHEC Business School (France)

*Dominique Lamoureux*  
 Vice President, Ethics and Corporate Responsibility  
 Thales Group (France)

- Reinforcing the FCPA/anti-corruption compliance message and getting the management buy-in
- How to deliver value-added compliance in a difficult economic climate
- Measuring and reporting the effectiveness of the compliance programme in financial terms: what metrics and tools can be used to demonstrate value?
- Pros and cons of linking successful compliance to zero prosecution for anti-corruption violations and subsequent fines
- Influencing the creation of a culture of compliance awareness for a better control of related risks
- How do companies proactively address corruption risks today – what is changing?
  - individual versus collective approaches
  - advantages of sector-related and project-relates initiatives
- How internal compliance departments contribute to the company's strategy and performance
- Managing resources efficiently to minimise unnecessary work and subsequent follow-ups

3:45 **Refreshment Break**

4:00 **Conducting Pre-Transactional Anti-Corruption Due Diligence to Expose Corruption Risks in M&As**

*Jean-Luc Gustave*  
 Director  
 World-Check France

*Poju Adedeji*  
 Africa Region Legal & Compliance Director  
 Baker Hughes Africa Region Office (France)

*Edoardo Lazzerini*  
 Compliance & Business Practices Director  
 Schering-Plough Pharmaceuticals (Italy)

- What an acquirer should look for in a target's anti-corruption compliance programme to avoid successor liability and to minimise deal risk
  - internal policies, systems, processes and controls
  - historical risk issues in compliance and how they were effectively dealt with
- Core due diligence steps to assess the controls environment and specific business risks
- Setting an internal M&A action plan and assigning responsibilities to a designated team
- How to make the most of your external counsel in the M&A process
- Assessing corruption risk profile of a potential transaction
- Tools and best practices for pricing the risks
- What practical steps do you need to follow in higher risk transactions?

- Steps to take when the acquirer is unable to perform satisfactory pre acquisition due diligence due to foreign laws restrictions
- What to do when a history of corruption is discovered pre and post acquisition: assessing disclosure and privilege issues in a transaction
- Advantages and disadvantages of seeking pre-transactional review and approval from appropriate authorities

4:45

- Ramifications and risks of poor pre-transactional anti-corruption due diligence in M&A
- Examples of successful due diligence and operations that went wrong

Conference Ends

## POST-CONFERENCE WORKSHOP | FRIDAY 22 OCTOBER 2010

9:00 a.m. to 12:30 p.m. (Registration Opens at 8:30 a.m.)

### B Ensuring Compliance of Commercial Intermediaries and Joint Venture Partners to Minimise Third Party Liability Risk

*Anne Longchamp*

Group International Compliance Officer  
EADS (France)

*Philippe Montigny*

President, ETHIC Intelligence (France)

*Francois Vincke*

Chairman, ICC Anti-Corruption Commission  
International Chamber of Commerce (Belgium)

*When considering a prospective business relationship, conducting effective anti-corruption due diligence is an absolute imperative. Failure to uncover corruption problems or mitigate corruption risks can result in reputational damage and, with increasing frequency, substantial criminal and regulatory exposure. This interactive and practical workshop will provide a detailed look at conducting third party due diligence. Workshop participants will learn how to overcome the legal, factual and cultural issues companies often confront when auditing overseas, and how to respond appropriately to issues identified during the due diligence process. You'll gain critical insights on:*

- How to design and implement due diligence for a prospective foreign third party including partners, agents, consultants, customs brokers, marketing and sales representatives, and other types of business associates
- How certification of 3rd party anti-corruption policies can reduce legal, financial and reputational risk
- Understand where the liability for companies starts and ends in their relationships with 3rd parties
- Understanding a foreign representative's reputation and confirming integrity, competence and experience

- Who, within the company is in charge of that control (Compliance officer, In-house lawyer, purchasing)?
- Assessing risks based on region and understanding local business practices
- Due diligence process information gathering under FCPA and the UK Bribery Act
  - conducting interviews
  - outside resources
- Identifying known conflicts including past and present relationships with government officials
- Determining the appropriate level of anti-corruption due diligence based on review of facts and circumstances
- Due diligence on suppliers or 2nd tier suppliers to a 3rd party (chain of 3rd party) – how far should you go?
- Obligations to provide regular reporting on the intermediary activities with proof of services provided and invoices to support his commissions
- How to prevent, cover or avoid any risk
- Addressing and resolving “red/orange flags” detected
- How concerned should you be with local law?
- Due diligence practices for long term sales and marketing relationships versus short term relationships to address a specific need
- Generating anti-corruption due diligence report
  - scope of investigation
  - summary of findings, analysis and recommendations
- Structuring a successful relationship with third party representatives

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# 9<sup>th</sup> European Forum on ANTI-CORRUPTION



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## DELEGATE DETAILS

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## ADMINISTRATIVE DETAILS

Date: 20-21 October 2010

Time: 8:45 - 4:45

Venue: Crowne Plaza Hotel Paris-République

Address: 10 Place de la Republique, Paris, 75011 France

Telephone: +33-1-43144350 Fax: +33-1-47003234

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An allocation of bedrooms is being held for delegates at a negotiated rate until 16 September 2010. To book your accommodation please call Venue Search on tel: +44 (0) 20 8541 5656 or e-mail [beds@venuesearch.co.uk](mailto:beds@venuesearch.co.uk). Please note, lower rates maybe available when booking via the internet or direct with the hotel, but different cancellation policies will apply.

## DOCUMENTATION IS PROVIDED BY CD

The documentation provided at the event will be available on CD only. If you are not able to attend, you can purchase a CD of the presentations provided to delegates on the day of the event. Please send us this completed booking form together with payment of €595 per copy requested. For further information please call +44 (0) 207 878 6888 or email [enquiries@C5-Online.com](mailto:enquiries@C5-Online.com).

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14.45 hours (conference only) plus 3 hours per master class towards Continuing Professional Developments hours (Solicitors Regulation Authority). Please contact C5 for further information on claiming your CPD points.

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Payment policy is due in full upon registering. Your entry to the event will not be guaranteed until payment has been received. All discounts will be applied to the Main Conference Only fee (excluding add-ons), cannot be combined with any other offer, and must be paid in full at time of order. Group discounts available to individuals employed by the same organisation.

## TERMS AND CONDITIONS

You must notify us by email at least 48 hours in advance if you wish to send a substitute participant. Delegates may not "share" a pass between multiple attendees without prior authorization. If you are unable to find a substitute, please notify C5 in writing no later than 10 days prior to the conference date and a credit voucher will be issued to you for the full amount paid, redeemable against any other C5 conference. If you prefer, you may request a refund of fees paid less a 25% service charge. No credits or refunds will be given for cancellations received after 10 days prior to the conference date. C5 reserves the right to cancel any conference for any reason and will not be responsible for airfare, hotel or any other costs incurred by attendees. No liability is assumed by C5 for changes in program date, content, speakers or venue.

## INCORRECT MAILING INFORMATION

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