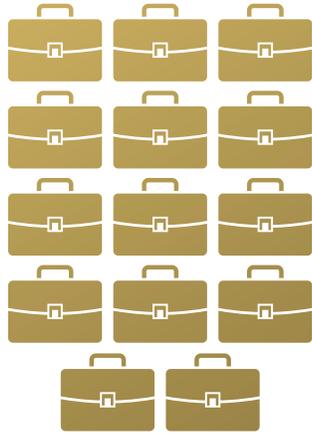


FCPA 2019 YEAR IN NUMBERS

ENFORCEMENT CASES AND SETTLEMENT AMOUNTS

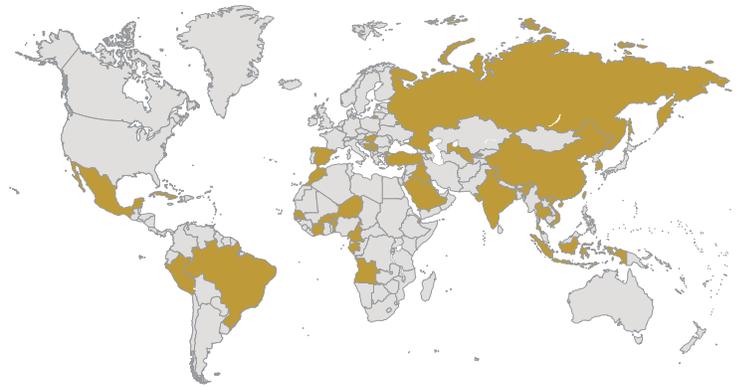


14 Cases
AND
\$2.65B
in Settlement Amounts

INDUSTRIES MOST AFFECTED



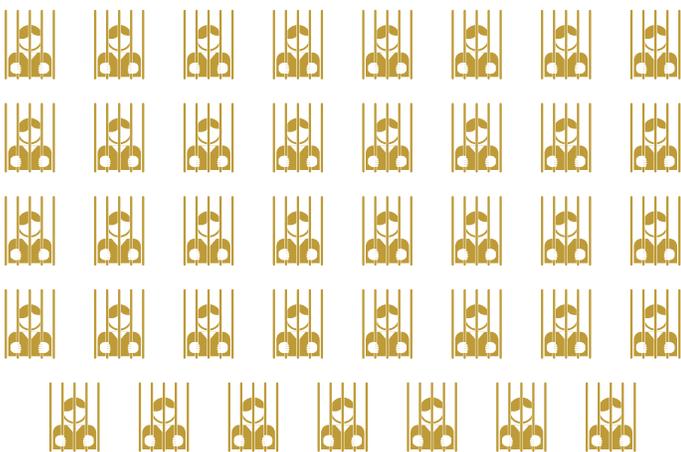
WHERE IMPROPER CONDUCT OCCURRED



Ranked by Number of Cases

- | | | | |
|--------------|--------------------------|-------------|---------------------|
| China | Barbados | Iran | Senegal |
| Brazil | Benin | Iraq | Serbia & Montenegro |
| India | Bosnia and Herzegovina | Ivory Coast | South Korea |
| Venezuela | Burkina Faso | Kazakhstan | Spain |
| Saudi Arabia | Cameroon | Kuwait | Syria |
| Mexico | Cuba | Libya | Thailand |
| Russia | Democratic Rep. of Congo | Malaysia | Uganda |
| Turkey | Djibouti | Morocco | Uzbekistan |
| Algeria | Gabon | Mozambique | Vietnam |
| Azerbaijan | Hungary | Niger | |
| Angola | Indonesia | Peru | |

ANNOUNCED FCPA AND FCPA-RELATED ACTIONS AGAINST INDIVIDUALS



39 Individuals
Charged or Indicted in 2019



Cuneyt A. Akay | Shareholder
1144 15th Street | Suite 3300
Denver, CO 80202 | 303.572.6500