

ISLANDE – ICELAND

| Case/Country (date which first appears on matrix) | Date of alleged act(s) | Parties | Alleged Acts and Procedural Stage | Public Source(s) (d/m/yr) |
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| ISLANDE – ICELAND (implementing legislation entered into force on 30 December 1998) | | | | |
| Actavis (Serbia) (05/17) (See also under Etat-Unis) | 2007 - 2009 | Actavis (Icelandic Pharmaceutica l Company) Borojevic (a director of the Institute for Oncology and Radiology) Public officials in Serbia | <ul style="list-style-type: none"> •<u>Alleged acts</u>: Actavis has allegedly been involved in bribery of state officials in order to obtain preferential status when it comes to the sale of oncology products in Serbia, •<u>Procedural stage in US: 11/11</u>: Indictment disclosed to SEC. •<u>Procedural stage in Serbia: 08/11</u>: Officials at Actavis confirmed they were served in July and August 2011 with criminal indictments related to allegedly improper payments to physicians including Borojevic at his state-run institute, and said they had filed certain procedural objections. | Reuters 28/02/12 |
| Finmeccanica/ Sigurjon Asbjornsson (Sweden) 9/15 (See also under Italy (Finmeccanica) and the UK) | 2012 | Finmeccanica (Italian helicopter manufacturer) Agusta Westland (British subsidiary) Sigurjon Asbjornsson (Icelandic intermediary and AgustaWestla nd distributor) Unnamed Swedish intermediary SMA (Swedish Maritime Administration) (government agency) | <p><u>Alleged acts</u>: AgustaWestland corruptly obtained a EUR 90 million contract for the sale of seven helicopters to the Swedish Maritime Administration. An initial call for tender is rejected after a judicial challenge by Eurocopter. The Swedish officials then reportedly entered into a contract with AgustaWestland through Sigurjon Asbjornsson, an Icelandic intermediary and the Scandinavian AgustaWestland distributor. The deal was halted following another judicial challenge. A final call for tender resulted in only one bidder – AgustaWestland.</p> <ul style="list-style-type: none"> •<u>Procedural stage in the UK</u>: No info. •<u>Procedural stage in Italy</u>: No info. •<u>Procedural stage in Iceland</u>: No info. •<u>Procedural stage in Sweden: 5/15</u>: The Swedish Authority for Competition and anti-corruption prosecutors have launched a preliminary investigation. SMA offices have been searched and documents and IT material seized. | L'Espresso 22/5/15; AvioNews, 22/5/15; BusinessLine 19/6/15; The Local, 19/6/15 |

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| ENRC (Kazakhstan, DRC) | Undisclosed | Eurasian Natural Resources | • <u>Alleged acts</u> : ENRC is reportedly investigating allegations into potential instances of corruption in relation to | Legal Business 12/10/17;FT |

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| <p>(5/13) (See also under Luxembourg and Royaume Uni)</p> | | <p>Corporation (ENRC) ((in 2013, ENRC delisted from the London Stock Exchange and changed its name to Eurasian Resources Group. It was then purchased by a company newly incorporated in Luxembourg in 11/13. Kazakh government owns 40% share); Felix Vulis (ex- CEO of ENRC) Victor Hanna (former Head of ENRC Africa unit) Dan Gertler (mining entrepreneur based in Israel) SSGPO (ENRC offshot running iron ore business in Kazakhstan)</p> | <p>operations in Kazakhstan and DRC. ENRC acquired concessions in Congo via offshore vehicles controlled by Dan Gertler, an Israeli businessman close to President Joseph Kabila. Between September 2009 and December 2012 ENRC undertook deals worth more than \$2.9bn in the Congo according to company filings, many of them involving Gertler-related companies. On average, offshore companies paid just a sixth of the price of independent valuations in the case of the five deals scrutinised by the APP and then sold them on at rates of return averaging 512 per cent. This generated a return of \$1.63bn on assets purchased for \$275.5m. Mr Gertler denies the assets were undervalued and has defended his purchase prices as having taken place at a time of instability in the Congo when no one else wanted to buy. ENRC said that all acquisitions made since its initial public offering in 2007 had followed “appropriate regulatory and board best practice”.</p> <p>•<u>Procedural stage in UK</u>: ENRC in communication with SFO.</p> <p><u>4/13</u>: The SFO has begun criminal investigations into ENRC’s actions in Kazakhstan and Africa. The company is cooperating. The company had been conducting a high-profile internal investigation, which has led to a series of departures, including chairman Mehmet Dalman (who was leading the investigation) and its outside counsel Dechert.</p> <p><u>5/13</u>: The UK’s Serious Fraud Office is preparing to send investigators to the Congo as part of its criminal probe into ENRC. <u>2016</u>: The prosecutor carried out round of interviews with potential suspects in the investigation <u>07/16</u>: the SFO received a blockbuster funding from the Treasury to pursue its investigation. <u>09/16</u> Victor Hanna, former CEO ENRC Africa interviewed by SFO. <u>12/16</u>: the SFO is investigating Dan Gertler and four former ENRC executives. SFO requested banking and business records in relation to an investigation of 4 DRC-registered companies and 9 individuals including ex-CEO Felix Vulis, Hanna, two other ENRC executives, David Gertler and two of his associates. <u>2/17</u>: UK SFO petitioned a London judge to force ENRC to hand over documents subject to legal privilege. <u>5/17</u>: Court rejects ENRC privilege</p> | <p>9/5/2017; Bloomberg 6/2/17; Bloomberg, 5/12/16; IB Times 5/12/16; Bloomberg 04/07/16; FT 03/07/16; FT 22/11/13; FT 9/5/13 ; FT 3/5/13 ; DomainB 4/26/13 ; Guardian 4/25/13 ; Economist 18/05/13 Telegraph 11/12/11</p> |

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| | | | <p>claims concerning most documents sought by SFO – except for a presentation given by Dechert law firm to Board about investigation. ENRC has appealed the decision.</p> <p><u>10/17</u>: ENRC granted right to appeal privilege ruling.</p> <ul style="list-style-type: none"> •<u>Procedural stage in Kazakhstan</u>: No info. •<u>Procedural stage DRC</u>: No info. •<u>Procedural stage in Israel</u>: No info. | |
| <p>Katanga Mining (DRC) (10/17) (See also under Canada, Royaume-Uni and Suisse)</p> | 2013-2016 | <p>Katanga Mining (Canada-based subsidiary of Glencore – listed on the Toronto Stock Exchange)</p> <p>Glencore PLC (Swiss-UK copper-mining company - parent company of Katanga Mining)</p> <p>Kamoto Copper Company (subsidiary company of Katanga mining)</p> <p>Dan Gertler (mining entrepreneur based in Israel)</p> <p>Fleurette Group (Cayman islands-based company owned by Dan Gertler)</p> <p>Africa Horizons Investment Company (business unit</p> | <ul style="list-style-type: none"> • <u>Alleged acts</u>: Katanga Mining allegedly paid over USD 100 million in royalties and bonus payments to Africa Horizons company, a business unit of Fleurette Group controlled by Dan Gertler, an Israeli diamond tycoon with close ties to DRC President Joseph Kabila, who has been accused of paying bribes to Congolese officials. The payments were allegedly made to advance Katanga’s mining interests. Katanga Mining’s payments were expected to be made to Gecamines – a DRC state-owned mining company, but instead were sent to Africa Horizons company. <p>The shift in payments was not reported in Katanga Mining’s and Glencore’s company filings despite this being a known risk of corruption. Glencore has acknowledged the shift in payments and said it has done it at the request of Gecamines. <u>11/17</u>: Following “Paradise Papers” leak, reported that Glencore’s 2009 loan for USD 45 million to a company tied to Dan Gertler was conditioned on Gertler’s obtention of DRC approvals for Katanga Mining.</p> <p><u>Procedural stage in US: 01/18 the U.S. Treasury issued sanctions against Dan Gertler and 19 companies linked to him under the 2016 Global Magnitsky Human Rights Accountability Act. Dan Gertler’s assets within U.S. jurisdiction were frozen for human right violations and corruption in RDC The order also prohibits U.S. persons from engaging in transactions with Gertler.</u></p> <p>Three MLA requests were sent to the Swiss Federal Office of Justice to access bank accounts of companies related to "Dan Gertler and others". In his request for assistance to Switzerland, the US Attorney wrote that he obtained evidence</p> | <p>The Guardian 28/01/18</p> <p>Tdg 01/18</p> <p>US Department of the Treasury, 12/18</p> <p>Lemonde 19/12/17;</p> <p>Forward 24/12/17;</p> <p>The Times 22/12/17;</p> <p>Financial Times 21/12/17;</p> <p>Bloomberg 20/11/17;</p> <p>Financial Post 20/11/17;</p> <p>Independent 6/11/17;</p> <p>Fox Business 28/07/17</p> <p>Miningreview 06/03/17</p> <p>Bloomberg 03/03/17</p> <p>Globalwitness 03/03/17</p> <p>Mining.com 16/11/16</p> |

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| | | of Fleurette Group)Gecamines (DRC state-owned mining company) | <p>during his investigation showing that Dan Gertler's transactions in RDC "involved bribe payments. - to senior foreign government officials in exchange for obtaining and maintaining mineral rights and government concessions and preferential treatment in the DRC. These payments were made both in cash and in kind, including luxury goods and extravagant personal travel. " According to US investigators, several transactions have passed through Switzerland.</p> <ul style="list-style-type: none"> • <u>Procedural stage in Israel:</u> No info. • <u>Procedural stage in Canada:</u> Ontario Securities Commission initiated investigation on the violation by Katanga Mining of disclosure obligations of business transactions with its investors. No investigation on bribery has been initiated. • <u>Procedural stage in UK:</u> a MLA request was sent to the Swiss authorities. • <u>Procedural stage in Switzerland:</u> The NGO Public Eye filed a criminal request denouncing Glencore with the Public Prosecutor's Office of the Swiss Confederation, asking him to open a case against Glencore for its activities in the Democratic Republic of Congo (DRC). The Swiss prosecutors will then have to decide whether it considers the denunciation admissible.01/18: Three MLA requests were sent by the US to the Swiss Federal Office of Justice to access bank accounts of companies related to "Dan Gertler and others". Two the companies o owned byDan Gertler, objected to the transmission of bank account information and raised an appeal. The Court ruled that the crimes are serious and that there is a sufficiently clear link between the US investigations and the requested information. The Swiss Federal Office ordered the "collection of bank records of various companies". • <u>Procedural stage in DRC:</u> No info. | |
| Odebrecht/Highway Project (Peru) (2/16) (See also under | 2006 | Odebrecht (construction company) Marcelo Odebrecht | <ul style="list-style-type: none"> • <u>Alleged facts:</u> Brazilian police suggested that Peru's president Ollanta Humala Tasso might have received bribes of USD 3 Million (R\$4.8m) from Odebrecht in return for the Peruvian government's giving the green light | Reuters 12/01/18 Folha de Sao Paulo |

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| Brésil et Italie) | | <p>(CEO)</p> <p>Odebrecht Peru (subsidiary)</p> <p>Former Regional President, César Álvarez</p> <p>Fernando Migliaccio (businessman who controls la Alta Mar Constructora Internacional Constructora Internacional del Sur y Klienfeld Servicios)</p> <p>Yossi (Josef) Maiman, Peruvian-Israeli businessman and close friend of Toledo</p> <p>Peru's former president Ollanta Humala Tasso</p> <p>Peru's former president Alejandro Toledo</p> <p>Edwin Luyo, official who served on the government's bidding commission</p> <p>Jorge Cuba Deputy transportation minister</p> <p>Graña y Montero (engineering conglomerate listed on</p> | <p>to investments by Odebrecht in the country, including a transcontinental highway project (Interoceánica Sur highway). Payments would have been made by the intermediation of Fernando Migliaccio and his company la Alta Mar Constructora Internacional Constructora Internacional del Sur y Klienfeld Servicios. In February 2017, Odebecht's executive director for Peru, Jorge Barata, testified in the ongoing Peruvian investigation that Graña y Montero, along with two other companies in consortium with Odebrecht - ICCGSA and JJC Contratistas Generales - knew that Odebrecht was paying bribes to secure the highway contracts. The three companies formed a consortium which won the bid in 2005 for Sections II and III of the Interoceánica Sur highway.</p> <p><u>05/17</u>: Jorge Acurio, former governor of the Cusco region, allegedly coordinated the payment of \$3 million in bribes from Odebrecht to favor the company in a public works contract.</p> <p><u>Procedural stage in Brazil: 6/15</u> Marcelo Odebrecht was jailed and on trial for corruption and money laundering in relation to the operation Lava Jato, charges he denies. <u>2/16</u>: evidence presented to a Brazilian court by Brazil Federal police analysts in the context of the Petrobras bribery case in which Odebrecht is allegedly involved. An arrest warrant has been issued for Migliaccio who is currently located in the US. <u>3/16</u>: Federal court sentenced M. Odebrecht to 19 years in prison on charges of money laundering, corruption and taking part in a criminal association in the Operation Lava Jato. According to a federal court filings in Brazil, the Brazilian police have uncovered evidence that Peruvian President Ollanta Humala may have received US\$3 million in kickbacks from Odebrecht. <u>12/16</u>: Odebrecht entered into a plea agreement with US, Brazilian and Swiss authorities and agreed to cooperate with Peruvian authorities and pay an initial USD 8.9 million (approximately the amount of money gained from the bribe). (<i>TdT 12/17</i>): The Brazilian Federal Prosecution Service entered into a settlement with Odebrecht and 77 of its employees. Under this settlement, relating to acts of corruption and money laundering committed in Brazil and in 11 other countries, the employees have agreed to serve criminal penalties and the company has agreed to</p> | <p>20/12/17</p> <p>TdT 12/17 (Brazil)</p> <p>Times of Israel 03/04/17;</p> <p>Reuters 17/05/17;</p> <p>Wall Street Journal 17/04/17;</p> <p>Crhoy.com 06/03/2017;</p> <p>Peruvian Times 28/02/17;</p> <p>Reuters 16/02/17;</p> <p>LA times 09/02/17</p> <p>Peru Reports 23/01/17</p> <p>Reuters (17/01/17)</p> <p>BBC 06/02/2017 Reuters 13/01/2017</p> <p>Portugal Digital 05/01/2017</p> <p>Fcpablog 11/03/16</p> <p>Buenos Aires Herald 10/03/16</p> <p>La Republica 23/02/16</p> <p>FT 24/02/16;</p> <p>Reuters 23/02/16;</p> <p>Veja 22/02/16</p> <p>O globo 20/09/15</p> <p>Latincorrespo</p> |

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| | | NYSE) Ingenieros Civiles y Contratistas Generales S.A. JJC Contratistas Generales Jorge Acurio, former governor of the Cusco region Jose Francisco Zaragoza Amiel (acted as an intermediary between Odebrecht and Acurio) | pay fines and restitution to Brazilian state entities damaged. The settlement with Brazilian authorities is sustained on reasons of public interest, amongst which is the need to stimulate the company to negotiate and settle directly with foreign jurisdictions which might be interested in having access to the evidence of bribery provided by the company, aiming to promote the expansion of bribery investigations in Brazil and abroad, as stated in Clause 2 of the leniency agreement. The company has reported that it has reached pre-settlements with Peruvian authorities, under which it will directly provide them any evidence of bribery. Additionally, Brazil has offered spontaneous information to Peru on facts related to that country and has already fulfilled to two requests from Peruvian authorities to share evidence. Other requests are being handled. <u>12/17: Marcelo Odebrecht is released from prison and allowed to serve his sentenced under house arrest.</u> • <u>Procedural stage in Peru: 7/15:</u> Peruvian prosecutors are looking into the allegations and plan to visit Brazil to gather evidence of bribery related to the transcontinental highway project. César Álvarez was incarcerated and accused of fixing contracts and demanding an early down-payment. <u>2/16:</u> Peru's attorney general's office said that because of Presidential immunity prosecutors would not be able to investigate Humala until after his term ends in late July 2016. <u>11/16:</u> Peruvian authorities began investigating Odebrecht's activity. <u>01/17:</u> As part of its deal with Peruvian authorities, Odebrecht agreed to provide information relevant to the investigation. <u>02/17:</u> Toledo was charged with influence peddling and money laundering and accused of having received \$20 million from Odebrecht in exchange for favoring the company in bidding to build the Interoceanic Highway connecting Brazil to Peru's ports. Peruvian prosecutors have requested Toledo's arrest and extradition from France due to evidence demonstrating that he accepted millions of dollars (approximately USD 20 million) in bribes from Odebrecht. Authorities have arrested Edwin Luyo, an official who served on the government's bidding commission, and issued an arrest warrant for deputy transportation minister Jorge Cuba. | ndent 21/07/15; lbtimes 19/06/15 |

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| | | | <p><u>02/17</u>: The Peruvian Ombudsman called for prosecutors to investigate Graña y Montero, ICCGA Contratistas Generales and JJC Contratistas Generales due to their involvement in the projects for which Odebrecht paid bribes.</p> <p><u>03/17</u>: The Prosecutor's office is asked to open an investigation into former Peruvian president Alan García and Peruvian authorities also seek the extradition of former Peruvian president Alejandro Toledo from the United States.</p> <p><u>04/17</u>: Yossi Maiman is arrested due to his alleged involvement in the scandal.</p> <p><u>05/17</u>: Acurio and Zaragoza were arrested. Simultaneous raids were conducted in six buildings in Lima and five in Cusco.</p> <p><u>01/18</u>: Peruvian prosecutors raided the Lima offices of Grana y Montero. As part of the same operation, Peruvian authorities targeted 42 properties and arrested a former advisor to the transport ministry.</p> <p>•<u>Procedural stage in Switzerland</u>: 2/16: The Swiss police detained Fernando Migliaccio da Silva, a former executive of Odebrecht who is suspected by Brazilian prosecutors of making alleged underhand international payments for the group. A Brazilian judge has issued an order for his arrest but prosecutors said his detention in Switzerland was not at the request of Brazilian authorities.</p> <p>•<u>Procedural stage in the US</u>: 12/16: Odebrecht signed a USD1.94 billion leniency deal with U.S. Swiss and Brazilian prosecutors to settle bribery allegations in 12 countries.</p> <p>•<u>04/17</u>: The DOJ said in a court filing that the U.S. share of Odebrecht's "global" criminal penalty for its December FCPA resolution will be USD\$93 million and not USD\$260 million. The DOJ cited its analysis of Odebrecht's "ability to pay" as a reason for the reduction in the U.S. criminal penalty.</p> | |
| Och-Ziff Capital Management Group LLC/Fleurette Group (Democratic Republic of the | Undisclosed | Och-Ziff Capital Management Group LLC Daniel Och (CEO of Och-Ziff) | <p>• <u>Alleged acts</u>: Och-Ziff's allegedly secured mining deals in DRC with the intermediation of the Israeli billionaire Dan Gertler who allegedly used his close ties to Joseph Kabila.</p> <p>• <u>Procedural stage in the US</u>: 08/15: investigation ongoing. <u>10/16</u>: Och-Ziff</p> | Law 360 21/8/17 SEC 26/1/17 FT 26/1/17 Jewishnews 5/10/16 |

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| Congo (09/15) (See also under États-Unis) | | <p>Michael Cohen (hedge fund manager based in London –head of OchZiff’s European investing)</p> <p>Vanja Baros, investment executive</p> <p>OZ Africa Management GP LLC (OZ Africa - wholly- owned subsidiary)</p> <p>Dan Gertler (Israeli billionaire)</p> <p>Fleurette Group, Dan Gertler’s holding company</p> <p>Joseph Kabila, (president of the DRC)</p> | <p>agreed to pay \$412 million to resolve civil and criminal allegations of bribery in Congo, Libya, Chad and Niger. Och entered into a DPA with the DOJ and agreed to pay \$213 million. OZ Africa pleaded guilty to conspiracy to violate the FCPA in the Democratic Republic of Congo Sentencing has been scheduled for March 2017. The SEC filed a cease and desist order against Och-Ziff Capital Management Group LLC and OZ Management LP, whereby Och-Ziff agreed to pay approximately \$199 million in disgorgement, including prejudgment interest. Daniel Och, the CEO, agreed to pay \$2.2 million to settle SEC charges that he caused record-keeping violations in two Och-Ziff transactions in the Democratic Republic of the Congo in which bribes were paid and recorded as investments or loans on the firm’s books. He didn’t admit or deny the SEC’s findings when agreeing to pay the \$1.9 million in disgorgement and nearly \$274,000 in interest. The U.S. Securities and Exchange Commission (SEC) said: “These bribes were paid with the specific knowledge of a senior OchZiff employee who was the head of OchZiff Europe.” Michael Cohen headed OchZiff’s European investing at the time. Cohen would be under investigation. <u>1/17</u>: SEC charged two additional Executives - Michel Cohen and Vanja Baros. <u>8/17</u>: Cohen and Baros have filed a petition asking for the case to be dismissed on the grounds of time bar.</p> <ul style="list-style-type: none"> •<u>Procedural stage in Israel</u>: No info. •<u>Procedural stage in RDC</u>: No info. | <p>DOJ 29/09/16</p> <p>WSJ 5/08/15</p> |
| Shapir (Romania) (3/14) | 2012 | <p>Shapir Structure Ltd</p> <p>Avraham Morgenstern (Shapir’s representative)</p> <p>Larton Consultants (off-shore company hold by Shapir Structures Ltd)</p> <p>Elan Schwartz- berg (Romanian intermediary)</p> <p>Melici</p> | <ul style="list-style-type: none"> • <u>Alleged acts</u>: Shapir allegedly obtained a market of 10 million euros for the construction of social housing in Constanta (Romania) in exchange of a bribe of 175 000 euros given by its representative Avraham Morgenstern to the mayor of Constanta, Radu Mazare. Bribes were allegedly paid by Larton Consultants, and transferred to Melici Management Inc. which ultimately transferred the amount Razu Mazare and his brother’s accounts at Israel Discount Bank. • <u>Procedural stage in Israel</u>: Israel’s state attorney’s office opens investigation into Shapir Engineering over allegations that its subsidiary, Shapir Structures Romania, paid bribes to Romanian officials. • <u>Procedural stage in Romania</u>: Police | <p>Mediafax 11/08/17</p> <p>GIR 21/02/17;</p> <p>Adevarul News (1/5/15);</p> <p>Romania- Insider (10/4/14);</p> <p>Replica 13/01/12;</p> <p>Mediafax 10/04/13;</p> |

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| | | Management Inc. (real beneficiary Elan Schwartzenberg) Radu Mazare, (Mayor of the Romanian city - Constanta) | detained Mazare and Morgenstern on 8/4/14 and released them 9/4/14 after charging them with bribery. <u>Specifically</u> , Radu Mazare has been charged with taking a bribe in return for awarding a company the tender to build 900 low-cost apartments for socially deprived residents. 5/15: High Court agrees to a continuance of Mazare’s detainment. Decision appealed to Supreme Court. 8/17: Morgenstern is sentenced to 8 years imprisonment for tax evasion by the Court of Appeal – it is not clear if the sentence included the bribery allegations. | |
| Steinmetz (Romania) (12/15) | 2006 | Beny Steinmetz, Shimon Sheves and Tal Silberstein (Israeli businessmen) Remus Truica Prince Paul-Phillip Hohenzollern Government officials of Romania | <ul style="list-style-type: none"> •<u>Alleged acts:</u> Israeli businessmen Beny Steinmetz, Shimon Sheves and Tal Silberstein are allegedly involved in bribes for government land covering 170,000-sq.m. in the north of Bucharest. They allegedly aimed to acquire the whole property claimed by Hohenzollern, also known as Paul Lambrino, who hired Truica in 2006 to help him, and he, in turn, allegedly recruited the Israeli businessmen, by providing money or goods to officials/institutions holding these properties to influence their decisions by inciting, aiding and abetting to commit abuse of office by these persons. It is alleged that the group managed to return several properties to Hohenzollern. In exchange for their services, Truica and his associates were compensated between 50% to 80% of the assets’ value. •<u>Procedural stage in Israel:</u> 01/17: Israeli Police arrest Steinmetz on suspicion of bribing a foreign official and place him on house arrest. He is released two weeks with no charges laid. •<u>Procedural stage in Romania:</u> 12/15: Romania’s National Anticorruption Directorate arrested Mr Truica and called Prince Paul for questioning. Romanian prosecutors accused the Israeli billionaire Beny Steinmetz and several other Israelis of conducting illicit real estate deals that cost the state nearly \$150 million. | Reuters 04/01/17; Globe 13/12/15; Times of Israel 11/12/15. |
| Teva Pharmaceutical Industries Ltd. (Russia, Ukraine, Argentina and Mexico) (3/13) | 2007-2012 | Teva Pharmaceutical Industries Ltd. (US listed Israeli company) | <ul style="list-style-type: none"> •<u>Alleged acts:</u> The company is alleged to have made bribe payments to secure pharmaceutical contracts in Latin America. The probe has expanded into eastern Europe and Russia. <u>Procedural stage in the US:</u> 11/12: The DOJ has joined the SEC in investigating the allegations. The company is cooperating with the US authorities in the investigation. | Times of Israel 15/01/18 TdT 12/17 (Argentina) TdT 6/17 (Mexico) |

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| (see also under Etats Unis) | | | <p>02/15: Teva’s internal investigation unearthed probably violations on three continents. <u>6/15</u>: Former Teva employee (former fraud examiner and director of finance for Latin America) brought a lawsuit against Teva claiming she was fired for aiding the US investigation. Lawsuit claims that employee was aware of history of corruption and FCPA violations in Latin America. <u>12/16</u>: Teva settled with the DOJ and SEC, agreeing to a USD 283 DPA with the DOJ and USD 236 of disgorgement to the SEC. The agreement does not cover the allegations in Argentina and Romania. <u>1/18</u>: Teva reaches a settlement deal with Israeli prosecutors. The value of the settlement is reported to be fines of NIS 75m (\$22.1m). The settlement expressly took into account “the company’s financial plight”, a subsequent compliance programme, and the fact that a settlement had already been agreed in the US. It covers payments to Russian, Ukranian and Mexican government officials. All criminal charges against the company have been closed.</p> <ul style="list-style-type: none"> •<u>Procedural stage in Israel: 2/17</u>: Israeli National Fraud Investigation Unit has reportedly opened an investigation into Teva following the settlement in the US. •<u>Procedural stage in Mexico: 05/14</u>: Mexico has cooperated with the United States of America in providing information through mutual legal assistance requests.(TdT 6/17) •<u>Procedural stage in Argentina: (TdT12/17)</u>: The limited information available indicates that at least 8 medical doctors have accepted bribes in order to pick and prescribe a specific product of TEVA Pharmaceutical Industries LTD. Bribery among private persons is not a crime in Argentina and medical profession is not considered a public duty or function. The argentine case was not part of the settlement between the company and the Department of Justice, and is believed to be originated from an internal audit. With such information it is not possible to open a preliminary investigation or to issue any indictment. | <p>Times of Israel, 8/2/17 El Faro 26/12/2016; Clarín 26/12/2016; Mirada Profesional 27/12/2016</p> <p>Times of Israel, 26/12/16</p> <p>Haaretz, 7/2/17</p> <p>Reuters, 7/2/17</p> <p>TPL, 27/12/16</p> <p>WSJ 30/6/15;</p> <p>Law 360 11/02/15;</p> <p>Compliance-week 01/11/13;</p> <p>Main Justice 2/11/12</p> |
| Teva Pharmaceutical (Romania) (10/15) | 2012-2015 | Teva Pharmaceutical (US listed Israeli company) | <ul style="list-style-type: none"> •<u>Alleged acts</u>: Teva Pharmaceutical allegedly paid bribes to various officials, including officials at the oncology sub-programme of Romania’s National Health Programme, as well as a public health | <p>Ceepharma 4/08/15;</p> <p>Romania-insider</p> |

| Case/Country (date which first appears on matrix) | Date of alleged act(s) | Parties | Alleged Acts and Procedural Stage | Public Source(s) (d/m/yr) |
|--|------------------------------|---|--|---|
| ISRAEL (implementing legislation entered into force on 21 July 2008) | | | | |
| (See also under États-Unis) | | Teva Pharmaceutica Is Romania (subsidiary) officials at the oncology sub- programme of Romania's National Health Programme, as well as a public health department inspector | department inspector in exchange for them prescribing the company's cancer drugs. <ul style="list-style-type: none"> •<u>Procedural stage in Israel</u>: No info. •<u>Procedural stage in US</u>: No info. •<u>Procedural stage in Romania</u>: <u>07/15</u>: DNA opened an investigation. | 30/07/15 |
| ZED+ (Russia) (03/17) (See also under Etats-Unis and Espagne) | Undisclosed | Grupo ZED+ (Spanish telecommunic ation company operating in the US) Grupo Tema (Russian subsidiary) Mikhail Fridman, Russian– Israeli oligarch co-founder and shareholder of Alfa-Group Vladimir Kolokoltsev, Minister of Internal Affairs of the Russian Federation. | <ul style="list-style-type: none"> •<u>Alleged acts</u>: ZED+ allegedly paid 30 millions of dollars in suspected bribes through its subsidiary in Russia, Grupo Tema, to the Minister of Interior of Russia. A Russian–Israeli oligarch Mikhail Fridman is alleged to also be involved in the bribery scheme. •<u>Procedural stage in Spain</u>: 2013-2014: investigation initiated after the disappearance of \$30 million from the Russian branch of Grupo Zed. The Central Unit for Economic and Fiscal Delinquency (Unidad Central de Delincuencia Económica y Fiscal, UCDEF) of the National Police Corps of Spain believes that the money had been withdrawn with the purpose to bribe top-ranked governmental officials in Russia. <u>01/16</u>: the local police arrested the director of ZED+ on 16 January 2017 •<u>Procedural stage in the United States</u>: investigation ongoing. The U.S. Department of Homeland Security, the SEC, CIA and FBI investigators have reportedly interviewed senior ZED+ management in New York •Procedural stage in Israel: No info. •Procedural stage in Russia: No info. | EI Confidential 30/12/2016 NLTimes 16/01/2017 Crime Russia 10/02/2017 |

ITALIE – ITALY

| Case/Country (date which first appears on matrix) | Date of alleged act(s) | Parties | Alleged Acts and Procedural Stage | Public Source(s) (d/m/yr) |
|--|------------------------------|---------|-----------------------------------|---------------------------------|
| ITALIE – ITALY (implementing legislation entered into force on 26 October 2000) | | | | |

| Case/Country (date which first appears on matrix) | Date of alleged act(s) | Parties | Alleged Acts and Procedural Stage | Public Source(s) (d/m/yr) |
|---|--------------------------------------|--|--|---|
| ITALIE – ITALY (implementing legislation entered into force on 26 October 2000) | | | | |
| *NEW* Cpl Concordia (Tunisia) (01/18) | Undisclosed – Before 2013 | Cpl Concordia (Italian gas and power engineering cooperative, headquartered in Modena) Francesco Simone (Director of Cpl Concordia) Massimo Continati (Administrative Director of Cpl Concordia) Giorgio Montali (external consultant of Cpl Concordia) Head of Tunis customs office Giuseppe Ferrandino (Mayor of Ischia) Silvano Arcamone (Head of Ischia municipal technical office) | <ul style="list-style-type: none"> • Alleged acts: Cpl Concordia allegedly created black funds in Tunisia through bribing the head of Tunis customs office and transferring cash into a local bank. These funds were ultimately used to bribe Giuseppe Ferrandino, mayor of Ischia, in exchange for the award of contracts regarding the gas supplies of Ischia. • Procedural stage in Italy: the Prosecutor Office of Naples started investigating in 2013. 03/15 Giuseppe Ferrandino and other nine persons are arrested in the course of the investigation. 04/15 Ferrandino is sent to home detention. For jurisdiction reasons the Tribunale del Riesame of Naples split the proceedings and decides that accused Cpl Concordia directors and employees will be tried in Modena, while Ferrandino and Arcamone will be tried in Naples. 01/18 Ferrandino and Arcamone are acquitted of passive bribery charges by the Tribunal of Naples. • Procedural stage in Tunisia: No info. | Il Fatto Quotidiano 16/01/2018 La Repubblica 23/04/2015 La Repubblica 30/03/2015 |
| Airbus (Austria) (09/17) (See also under Allemagne, Espagne, France, Pays-Bas and Royaume Uni) | 2003 | Airbus Group (European multinational aerospace and defence corporation, listed on Euronext, Bolsa de Madrid) | <ul style="list-style-type: none"> • Alleged Acts: Airbus is accused of paying EUR 183m in bribes to various public officials in the sale of 18 Eurofighter combat aircraft to Austria in 2003. Airbus is alleged to have mis-led Austria, inflated the price of the fighter planes, and hidden the bribes in the offset agreements arranged at the same time. A separate London-based company, Vector, which is now defunct, was set up to channel these payments. Negotiations were led by Airbus's defence business on behalf | Bloomberg 9/02/18 Handelsblatt 18/12/17 Mediapart, 25/10/17; Der Spiegel 06/10/2017; Mediapart 06/10/17; Handelsblatt |