

July 2010 / Special Alert

A legal update from Dechert's White Collar and Securities Litigation Group

Update on UK Bribery Act

In our April 2010 update, we reported on the enactment of the UK's new bribery legislation, the Bribery Act 2010. To access that report, please [click here](#).

Importantly, the Ministry of Justice announced on 20 July 2010 that the Act will come into force in April 2011 and that, prior to that:

- The Government will launch a short consultation exercise this September on the guidance about procedures which commercial organisations can put in place to prevent bribery (which procedures will be critical if businesses are to have any defence to the strict liability offence of failing to prevent bribery under section 7 of the Act).
- Following that consultation, the guidance about procedures will be published early in 2011 to allow businesses an adequate familiarisation period before the Act commences.

We anticipate sending out a further update when the consultation exercise commences in September as this will be the one opportunity for those wishing to contribute to the guidelines to express their views and possibly shape their form.

Further Information

For more information and detailed advice on the Bribery Act and UK law generally, please contact Andrew Hearn (+44 20 7184 7466; andrew.hearn@dechert.com), who is a partner in Dechert's White Collar and Securities Litigation team based in Dechert's London office.

For information and advice on the US Foreign Corrupt Practices Act and US law generally, please contact Robert Jossen (+1 212 698 3639; robert.jossen@dechert.com) and Benjamin Rosenberg (+1 212 698 3606; benjamin.rosenberg@dechert.com) from Dechert's New York office, or any other of our White Collar and Securities Litigation partners in the United States.

Practice group contacts

If you have questions regarding the information in this legal update, please contact one of the attorneys listed or the Dechert attorney with whom you regularly work. Visit us at www.dechert.com/securities.

If you would like to receive any of our other *DechertOnPoints*, please [click here](#).

Catherine Botticelli

Washington, D.C.
+1 202 261 3368
catherine.botticelli@dechert.com

Michael J. Gilbert

New York
+1 212 698 3886
michael.gilbert@dechert.com

Thomas H. Lee II

Philadelphia
+1 215 994 2994
thomas.lee@dechert.com

Stephen D. Brown

Philadelphia
+1 215 994 2240
stephen.brown@dechert.com

Robert C. Heim

Philadelphia
+1 215 994 2570
robert.heim@dechert.com

Andrew J. Levander

New York
+1 212 698 3683
andrew.levander@dechert.com

G. Eric Brunstad, Jr.

Hartford
+1 860 524 3960
eric.brunstad@dechert.com

Frederick G. Herold

Silicon Valley
+1 650 813 4930
frederick.herold@dechert.com

Daniel C. Malone

New York
+1 212 698 3861
daniel.malone@dechert.com

Robert A. Cohen

New York
+1 212 698 3501
robert.cohen@dechert.com

David S. Hoffner

New York
+1 212 649 8781
david.hoffner@dechert.com

Kathleen Massey

New York
+1 212 698 3686
kathleen.massey@dechert.com

David C. Chu

Hong Kong
+852 3518 4778
david.chu@dechert.com

Nicolle L. Jacoby

New York
+1 212 698 3820
nicolle.jacoby@dechert.com

Edward A. McDonald

New York
+1 212 698 3672
edward.mcdonald@dechert.com

William K. Dodds

New York
+1 212 698 3557
william.dodds@dechert.com

Robert J. Jossen

New York
+1 212 698 3639
robert.jossen@dechert.com

Gary J. Mennitt

New York
+1 212 698 3831
gary.mennitt@dechert.com

Michael S. Doluisio

Philadelphia
+1 215 994 2325
michael.doluisio@dechert.com

Michael L. Kichline

Philadelphia
+1 215 994 2439
michael.kichline@dechert.com

Kevin J. O'Brien

New York
+1 212 698 3697
kevin.obrien@dechert.com

Joseph F. Donley

New York
+1 212 649 8724
joseph.donley@dechert.com

David A. Kotler

Princeton
+1 609 955 3226
david.kotler@dechert.com

Charles I. Poret

New York
+1 212 698 3532
charles.poret@dechert.com

Steven A. Engel

Washington, D.C.
+1 202 261 3403
steven.engel@dechert.com

Cheryl A. Krause

Philadelphia
+1 215 994 2139
cheryl.krause@dechert.com

Benjamin E. Rosenberg

New York
+1 212 698 3606
benjamin.rosenberg@dechert.com

Steven B. Feirson

Philadelphia
+1 215 994 2489
steven.feirson@dechert.com

Matthew L. Larrabee

San Francisco
+1 415 262 4579
matthew.larrabee@dechert.com

Neil A. Steiner

New York
+1 212 698 3822
neil.steiner@dechert.com

Claude M. Tusk
New York
+1 212 698 3612
claude.tusk@dechert.com

Adam J. Wasserman
New York
+1 212 698 3580
adam.wasserman@dechert.com

Dechert
LLP

www.dechert.com

Dechert internationally is a combination of limited liability partnerships and other entities registered in different jurisdictions. Dechert has nearly 900 qualified lawyers and 700 staff members in its offices in Belgium, China, France, Germany, Hong Kong, Ireland, Luxembourg, Russia, the UK, and the US.

Dechert LLP is a limited liability partnership registered in England & Wales (Registered No. OC306029) and is regulated by the Solicitors Regulation Authority. The registered address is 160 Queen Victoria Street, London EC4V 4QQ, UK.

A list of names of the members of Dechert LLP (who are referred to as "partners") is available for inspection at the above address. The partners are solicitors or registered foreign lawyers. The use of the term "partners" should not be construed as indicating that the members of Dechert LLP are carrying on business in partnership for the purpose of the Partnership Act 1890.

Dechert (Paris) LLP is a limited liability partnership registered in England and Wales (Registered No. OC332363), governed by the Solicitors Regulation Authority, and registered with the French Bar pursuant to Directive 98/5/CE. A list of the names of the members of Dechert (Paris) LLP (who are solicitors or registered foreign lawyers) is available for inspection at our Paris office at 32 rue de Monceau, 75008 Paris, France, and at our registered office at 160 Queen Victoria Street, London, EC4V 4QQ, UK.

Dechert LLP is in association with Hwang & Co in Hong Kong.

This document is a basic summary of legal issues. It should not be relied upon as an authoritative statement of the law. You should obtain detailed legal advice before taking action. This publication, provided by Dechert LLP as a general informational service, may be considered attorney advertising in some jurisdictions. Prior results do not guarantee a similar outcome.

Dechert is an Irish partnership regulated by the Law Society of Ireland.

© 2010 Dechert LLP. Reproduction of items from this document is permitted provided you clearly acknowledge Dechert LLP as the source.

EUROPE Brussels • Dublin • London • Luxembourg • Moscow • Munich • Paris
U.S. Austin • Boston • Charlotte • Hartford • New York • Orange County • Philadelphia • Princeton • San Francisco • Silicon Valley • Washington, D.C. • **ASIA** Beijing • Hong Kong