

# **Selected China-Related Anti-Corruption/FCPA Representations**

中国相关的反腐败与 **FCPA** 的代表性  
案例

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## **Index 目录**

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<b>Internal Investigations 内部调查</b> .....	3
<b>Compliance Programs and Risk Assessments 合规项目和风险评估</b> .....	10
<b>Anti-Corruption Training 反腐败合规培训</b> .....	12
<b>Transactional Compliance / Due Diligence 交易合规 / 尽职调查</b> .....	14
<b>Compliance Counseling and Advice 合规咨询与建议</b> .....	15

## Internal Investigations 内部调查

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- **Internal investigation on behalf of a global conglomerate whose operations in China came under intense media and governmental scrutiny following public allegations of corruption and bid-rigging.**  
代表一家跨国企业就其中国业务因被公开指控涉嫌腐败与操纵投标行为而被媒体高度关注与政府严格审查开展内部调查。
- **On behalf of a multinational company, secured declination from the SEC in a matter involving payments and other things of value given to Chinese government officials and customers.**  
代表一家跨国公司对其涉嫌向中国政府官员及客户支付金钱与其他财物为其获取美国证交会不予起诉的决定。
- **Internal investigation for a US pharmaceutical company related to whistleblower allegations of corruption at its Chinese subsidiary.**  
代表一家美国医药公司针对涉嫌腐败的举报对其中国分公司开展内部调查。
- **Internal investigation on behalf of a European consulting firm after media reports alleged that the company's China general manager had made improper payments to a PRC government official.**  
代表一家欧洲咨询公司针对媒体关于该公司中国地区总经理涉嫌向中国政府官员进行不当支付的报道开展内部调查。
- **Internal investigation on behalf of a global electronic components company into allegations improper payments to state-owned aerospace customers in China and violations of US export control regulations.**  
代表一家全球电子零部件公司关于其向中国国有航空航天客户进行不当支付以及违反美国出口管制法规的指控开展内部调查。
- **Internal investigation for a global financial service company related to allegations of hiring relatives of senior government and Party officials.**  
代表一家跨国金融机构就其聘用高级党政官员的亲属的相关指控开展内部调查。
- **Internal investigation for a global pharmaceutical company after a sales representative in southern China was detained by Chinese enforcement authorities on allegations of paying bribes to doctors.**  
代表一家跨国医药公司因其某华南地区医药代表涉嫌行贿医生而被中国执法机构扣留开展内部调查。
- **Internal investigation on behalf of a global company after Chinese media reported that several of its employees engaged in corruption and bid-rigging with an intermediary affiliated with a senior Party official.**  
代表一家跨国企业针对中国媒体就其数名员工涉嫌腐败并伙同与某高级党政官员牵连的中间商操纵投标的报道开展内部调查。
- **Internal investigation for a multinational clean energy company related to allegations of improper payments to key government regulators.**  
代表一家跨国清洁能源企业就其涉嫌向重要政府监管人员进行不当支付的指控开展内部调查。

- **Internal investigation for a US company alleging kickbacks from suppliers resulting in product quality issues.**  
代表一家美国公司因涉嫌支付供应商回扣导致出现产品质量问题开展内部调查。
- **Internal investigation for a US automotive company related to allegations of improper payments to government officials in China.**  
代表一家美国汽车企业就其涉嫌向中国官员的不正当支付开展内部调查。
- **Internal investigation for a global life sciences company after media reports alleged kickbacks to healthcare professionals.**  
代表一家跨国生物科技公司针对媒体对其支付医护人员回扣进行报道开展内部调查。
- **Internal investigation for a US industrial conglomerate related to potential violations of the FCPA and company conflict of interest policies in China.**  
代表一家美国工业集团对其中国的营运涉嫌违反美国《反海外腐败法》及公司利益冲突政策开展内部调查。
- **Internal investigation on behalf of a US medical device company into allegations that its broker made improper payments to customs officials in China.**  
代表一家美国医疗器械公司针对其代理人向中国海关官员进行不当支付的指控开展内部调查。
- **Internal investigation for a global consumer goods company related to allegations of improper payments by a third party to customs officials in southern China.**  
代表一家跨国消费品公司就其涉嫌通过第三方向华南地区海关官员进行不正当支付而开展内部调查。
- **Internal investigation on behalf of a global pharmaceutical company into allegations of misuse of a post-marketing study.**  
代表一家跨国医药公司就其关于滥用上市后研究的相关指控开展内部调查。
- **Internal investigation for a transportation company related to allegations of improper payments to customs officials in eastern China.**  
代表一家全球性公司针对其涉嫌向华东地区海关官员的不正当支付指控开展内部调查。
- **Internal investigation on behalf a US manufacturing company into allegations of hiring a connected third party to assist with obtaining preferential tax treatment.**  
代表一家美国制造企业就其雇佣某关联第三方以协助获得税收优惠待遇的指控开展内部调查。
- **Internal investigation on behalf of a US entertainment conglomerate relating to the use of a third party in dealings with a Chinese state-owned media company.**  
代表一家美国娱乐集团就其通过第三方与中国国有传媒企业进行往来而开展内部调查。
- **Internal investigation on behalf of a multinational pharmaceutical company into allegations raised by a whistleblower regarding impropriety involving a senior manager's interactions with healthcare providers.**  
代表一家跨国医药企业针对企业高层管理人员与医护人员之间的不正当往来的举报开展内部调查。
- **Internal investigation on behalf of a global consumer products company after allegations emerged that bribes were paid to government officials to overlook significant safety violations at a factory in China.**

代表一家跨国消费品公司针对行贿政府官员以忽视其在华的一家工厂所存在的重大安全违规情况相关的指控而开展内部调查。

- **Internal investigation on behalf of a US medical device company into allegations that its distributor made improper payments to hospital officials in eastern China.**

代表一家美国医疗器械公司针对其经销商向中国华东地区公立医院官员进行不当支付的指控开展内部调查。

- **Internal investigation on behalf of a global company after Chinese investigators sought information about the company's connections with third parties affiliated with senior Chinese officials.**

代表一家跨国公司针对中国调查部门要求提供该公司与某些与中国政府高级官员有关联第三方之间关系相关信息开展内部调查。

- **Internal investigation for a multinational medical device company after an anonymous whistleblower made allegations about improper sales practices at the company's Chinese subsidiary.**

代表一家跨国医疗设备公司针对其中国分公司的业务存在不正当销售行为的匿名举报开展内部调查。

- **Internal investigation on behalf of a global technology company into allegations of improper payments to officials at state-owned entities, accepting kickbacks from vendors, and embezzlement.**

代表一家跨国高科技企业针对其涉嫌对国有企业官员进行不正当支付、接受供应商回扣，及侵占公款的指控开展内部调查。

- **Internal investigation on behalf of a global health company into reports of improper payments by its distributor to a key customer.**

代表一家跨国保健企业针对其经销商向重要客户进行不正当支付的报告开展内部调查。

- **Internal investigation on behalf of a global transportation company related to press reports in China alleging improprieties in government procurement.**

代表一家跨国运输公司针对有关中国媒体声称其在政府采购过程中存在的的行为而开展内部调查。

- **Internal investigation on behalf of a US medical device company into allegations that its distributor made improper payments to healthcare professional in China and relabeled company products.**

代表一家美国医疗器械公司针对其经销商向中国华东地区公立医院官员进行不当支付的指控开展内部调查。

- **Internal investigation for a multinational engineering and consulting company into allegations by the World Bank of improper conduct as part of a Bank-funded project in central China.**

代表一家跨国工程及咨询公司针对世界银行就其涉嫌华中地区的一银行资助项目中存在不当行为的指控而开展内部调查。

- **Internal investigation on behalf of a global technology company into allegations that a senior manager in China took kickbacks from distributors and engaged in channel stuffing.**

代表一家全球科技公司针对其中国高级经理收取经销商回扣和从事囤货的指控展开内部调查。

- **Internal investigation on behalf of a global life sciences company into allegations raised by a whistleblower related to improprieties related to use of a third-party meeting organizer.**  
代表一家跨国生物科技公司针对指控其不当使用第三方会务公司的举报开展内部调查。
- **Internal investigation for a global industrial equipment company involving sales to end-users through Chinese-based resellers, including advising the company on the restructuring of its Chinese sales channels in the wake of the investigation.**  
代表一家跨国工业设备企业对其通过中国承销商向终端用户的销售开展内部调查，并在调查结束后协助该企业对其中国销售渠道进行重组。
- **Assisting a global technology company with a disclosure to US authorities of allegations that its partner in China made improper payments to state-owned customers.**  
协助一家全球科技公司向美国政府披露其在中国的合作伙伴向国有企业客户进行不当支付的指控。
- **Investigation on behalf of a medical device company into allegations made to the SEC that improper payments were made to healthcare officials in China.**  
代表一家医疗器械公司因美国证交会收悉其向中国卫生部门官员进行不正当支付的相关指控而开展调查。
- **Assisted a multinational company whose local employee was detained by Chinese criminal enforcement authorities on bribery and corruption charges.**  
协助一家跨国公司处理其员工因受贿赂和腐败的指控而被中国司法机关拘留的事宜。
- **Internal investigation on behalf of a European company into whistleblower allegations of facilitating payments.**  
协助一家欧洲公司就疏通费的举报事宜开展内部调查。
- **Internal investigation on behalf of a global electronics company into allegations of expense report fraud and improper payments to state-owned customers in southern China.**  
代表一家全球电子公司针对其费用报告欺诈及向中国华南地区的国有企业客户进行不当支付的指控开展内部调查。
- **Assisted a global company accused by a municipal branch of the Administration of Industry and Commerce of violating PRC commercial bribery laws.**  
协助一家跨国公司处理其被某市工商局指控违反中国反商业贿赂法规的事宜。
- **Internal investigation on behalf of a consumer products company after Chinese media alleged improper payments to a now-imprisoned government official.**  
代表一家消费品公司针对中国媒体指控其向现已入狱的某政府官员进行不正当支付报道而开展内部调查。
- **Internal investigation on behalf of a trade association related to allegations of kickbacks in exchange for certifications.**  
代表一家行业协会针对其收受回扣换取认证的指控开展内部调查。
- **Internal investigation on behalf of a personal care products company related to allegations of bribing a government official in central China.**  
代表一家个人用品公司针对其华中地区贿赂某政府官员的指控开展内部调查。



- **Internal investigation on behalf of a European pharmaceutical company into allegations of fake meetings.**  
代表一家欧洲医药公司针对其虚假会议的指控而开展内部调查。
- **Targeted internal investigation on behalf of a global consulting firm into allegations of a conflict of interest involving a senior member of management in China.**  
代表一家全球咨询公司就涉及其在中国的一名高管利益冲突的指控开展针对性内部调查。
- **Advised a multinational company related to the termination of certain China-based employees for violations of the company's gifts and entertainment policies, including one employee who threatened to become a whistleblower.**  
协助一家跨国公司就其解聘违反公司礼品娱乐管理政策的部分中国地区员工（包括一名威胁进行举报的员工）事宜提供咨询。
- **Internal investigation on behalf of a global company after an affiliate of one of its dealers was named in the Chinese media as being convicted of making improper payments to a government official in northeastern China.**  
代表一家跨国公司针对其某经销商关联方因被中国媒体点名指控向中国东北地区的一名政府官员进行不正当支付而开展内部调查。
- **Internal investigation on behalf of a leading pharmaceutical company related to allegations of falsifying meetings and receipts used to pay kickbacks to state-owned pharmacies and pharmacists in exchange for increase sales.**  
代表一家行业领先地位的医药公司针对其伪造会议及收据方式向国有药房和药剂师支付回扣获取销售增长的指控而开展内部调查。
- **Internal investigation on behalf of a global technology company into allegations that employees in China engaged in fake transactions with state-owned customers.**  
代表一家全球科技公司针对其中国员工参与与国有企业客户虚假交易的指控开展内部调查。
- **Internal investigation on behalf of a global beverage company into whistleblower allegations of improper interactions with government officials.**  
代表一家跨国饮料公司针对其与政府官员的不正当往来举报而开展内部调查。
- **Internal investigation on behalf of an multinational electronics company into allegations of kickbacks paid by suppliers to company employees.**  
代表一家跨国电子企业针对其供应商向该公司员工支付回扣的指控而开展内部调查。
- **Internal investigation on behalf of an multinational healthcare company after an Administration of Industry and Commerce raided an office in eastern China related to a sponsorship of an event hosted by a medical association.**  
代表一家跨国医疗企业针对华东地区办公室赞助某医疗协会举办的某项活动而受到某工商局的突击检查开展内部调查。
- **Advising a global transportation software company on disclosure to US authorities related to allegations of improper payments in China.**  
为一家全球交通工具软件公司就向美国政府披露其涉及在中国进行不当支付的指控提供咨询。
- **Internal investigation on behalf of a personal care products company related to allegations of bribing a customs official in northern China.**  
代表一家个人用品公司针对其在华北地区贿赂海关官员的指控而开展内部调查。

- **Internal investigation on behalf of a leading pharmaceutical company related to allegations of paying kickbacks to physicians in and falsifying meetings in central China.**  
代表一家行业领先的医药公司针对其在华中地区向医师支付回扣及虚假会议的指控而开展内部调查。
- **Internal investigation on behalf of a US software company into allegations of conflicts of interest and channel stuffing.**  
代表一家美国软件公司针对其利益冲突和囤货的指控开展内部调查。
- **Assisting a global company in responding to an inquiry and document request from a Chinese regulator related to sales practices.**  
协助一家跨国公司对中国某监管机构关于其销售惯例进行质询与资料的提交进行答复。
- **Multiple internal investigations for a global pharmaceutical company related to accusations by local Administrations of Industry and Commerce that their sales practices violated PRC commercial bribery laws.**  
代表一家跨国医药企业针对地方工商局对其销售行为违反中国反商业贿赂法的指控而开展数起内部调查。
- **Internal investigation for a US company into allegations by the World Bank of improper conduct as part of a Bank-funded transportation project in eastern China.**  
为一家美国公司就世界银行对其提出的在中国华东地区一个银行融资运输项目中的不当行为的指控开展内部调查。
- **Targeted internal investigation for a materials company related to gifts to employees of a Chinese trade association.**  
代表一家物资公司就其向中国某行业协会雇员赠送礼品而开展针对性内部调查。
- **Targeted internal investigation for a multinational healthcare company in connection with alleged kickbacks to physicians in China.**  
代表某一家跨国医疗保健公司就其在华向医生支付回扣事宜开展针对性内部调查。
- **Advised a multinational technology company on best practices for investigating employees suspected of wrongdoing.**  
协助一家跨国科技企业就其对涉嫌存在不当行为雇员进行调查提供最佳实践方案。
- **Targeted internal investigation for a US medical device company related to allegations of kickbacks from distributors to senior sales personnel in China.**  
代表一家美国医疗设备公司就其经销商向公司中国高级销售人员支付回扣的指控而开展针对性内部调查。
- **Internal investigation for a multinational pharmaceutical company after an internal audit identified irregularities in expense reports by sales representatives.**  
为一家跨国医药公司在内部审计发现销售代表在费用报告中的不合规行为后开展内部调查。
- **Targeted internal investigation on behalf of a global company after its sales representative was interviewed by Chinese prosecutors.**  
代表一家跨国公司就其销售代表被中国检察院约见开展针对性内部调查。
- **Targeted internal investigation on behalf of a US pharmaceutical company after allegations were raised about cash payments to clinical investigators and oral promises of additional payments after cash payments ceased.**



代表一家美国制药公司就对临床研究人员进行现金支付及在终止现金支付之后仍予以口头承诺进一步支付的指控而开展相关针对性内部调查。

- **Advised a multinational conglomerate on privilege considerations in an internal investigation in China.**

为一家跨国集团就其中国进行内部调查所涉及的律师客户特权保护情况提供咨询。

- **Internal investigation on behalf of a global personal care products company into allegations of improper payments to government officials to obtain operating licenses in central and southern China.**

代表一家全球个人护理产品公司关于其为了在中国华中和华南地区获得运营许可向政府官员进行不当支付的指控开展内部调查。

- **More than a dozen internal investigations for a large pharmaceutical company related to employee reimbursement issues.**

代表一家大型医药公司针对其员工报销事宜而开展十几项内部调查。

- **Internal investigation on behalf of a manufacturing company into allegations that employees in southern China made improper payments to employees of a state-owned energy company and engaged in conflicts of interest.**

代表一家生产公司就其中国华南地区员工向一家国有能源公司员工进行不当支付并涉及利益冲突的指控开展内部调查。

- **Targeted internal investigation on behalf of US telecommunications company after the SEC began investigating its dealings with a Chinese state-owned telecom company.**

代表一家美国电信公司因美国证交会调查其与某中国国有电信企业之间的接触而开展针对性的内部调查。

- **Multiple targeted internal investigations on behalf of a global software company into allegations of conflicts of interest, fake orders, side agreements with channel partners, and channel stuffing.**

代表一家全球软件公司就其涉及的利益冲突、虚假定单、与渠道合作伙伴签订补充协议、以及囤货的指控开展多项针对性的内部调查。

- **Targeted internal investigation on behalf of a consumer products company into allegations of improper reimbursement of funds to a distributor to settle a government penalty.**

代表一家消费品公司为消除政府处罚而为经销商报销不当资金的指控开展针对性内部调查。

- **Advising a US medical device company on interactions with US regulators related to allegations of improper payments.**

向一家美国医疗器械公司就关于其不当支付的指控与美国政府官员沟通事宜提供咨询。

- **Targeted internal investigation for a multinational healthcare company after a sales representative admitted to purchasing gift cards to give to physicians in southwestern China.**

代表一家跨国医疗保健公司就某销售代表承认购买购物卡并赠予中国西南地区相关医师事宜开展针对性内部调查。

- **Internal investigation on behalf of a multinational electronics company into allegations that local employees made improper payments to officials in a bonded zone as part of a construction project in western China.**

代表一家跨国电子公司针对其当地员工在中国西部地区的一个建设项目中向保税区官员进行不当支付的指控开展内部调查。

- **Assisted two multinational companies in revising their internal investigation procedures.**  
协助两家跨国公司修订内部调查流程。
- **Advising a global consulting company on interactions with Chinese authorities related to findings of employee embezzlement.**  
为一家全球咨询公司就关于发现员工职务侵占与中国政府沟通事宜提供咨询。
- **Internal investigation on behalf of an Asia-based pharmaceutical company after Chinese prosecutors interviewed a senior government affairs employee, alleging bribes to Chinese government officials.**  
代表一家总部位于亚洲的医药公司针对中国检察机关就其某高级政府事务员工向中国政府官员行贿指控进行质询开展内部调查。
- **Advised multiple companies on revisions to employment policies, employment contracts, and IT use policies to ensure access to data as part of investigations.**  
协助多家公司修订员工雇佣政策、聘用合同与 IT 使用政策并确保数据访问为其调查的组成部分。

## Compliance Programs and Risk Assessments 合规项目和风险评估

- **Conducted a risk assessment for a global pharmaceutical company of its China operations, including transaction testing and interviews with several dozen employees to understand knowledge of company policies and procedures.**  
代表一家跨国医药公司针对其中国营运开展包括交易业务抽查及对其数十名员工进行访谈在内的风险评估以把握员工对公司内部政策及流程的知悉情况。
- **Conducted a risk assessment for the China operations of a global auto parts company, including overseeing forensic transaction review, and interviews of more than 60 employees at six facilities in mainland China and Taiwan.**  
代表一家跨国汽车配件公司针对其中国业务经营开展包括监督取证交易审核及访谈其位于中国大陆与台湾六处设施的 60 多名雇员的风险评估。
- **Advised a major US conglomerate on implementation of its corporate anti-corruption policies in its China subsidiaries.**  
协助一家大型美国集团公司在华子公司贯彻执行公司反腐败合规政策。
- **Conducted a risk assessment of a manufacturing company's China operations, including site visits in four provinces.**  
代表一家制造公司针对其中国营运开展包括于四个省份进行实地考察的风险评估。
- **Drafted tailored anti-corruption compliance procedures and training materials for Asian subsidiaries of a US healthcare company.**  
代表一家美国医疗保健公司为其亚洲子公司量身定制反腐败合规流程与培训材料。
- **Conducted a risk assessment and designed a targeted anti-corruption program for a sports and entertainment franchise doing business in China.**  
代表一家在华开展业务的体育及娱乐特许经营商为其提供风险评估并制订具有针对性的反贿赂政策项目。

- **Conducted a compliance risk assessment of the China operations of a global pharmaceutical company.**  
代表一家全球医药公司对其中国运营业务开展合规风险评估。
- **Conducted a risk assessment of an automotive company's logistics function in China.**  
代表一家汽车公司对其在华物流部门开展风险评估。
- **Developed anti-corruption guidance for expatriate employees of a multinational insurance company seconded to a Chinese state-owned enterprise.**  
协助一家跨国保险公司为其外派至中国国有企业的员工提供反腐败指导。
- **Conducted an FCPA gap analysis and implemented a tailored compliance program for an investment fund with projects across Asia, including China.**  
代表一家在中国和其它亚洲地区设有项目的投资基金公司为其提供美国《反海外腐败法》的差距分析并协助其执行量身定制的合规项目。
- **Developed a tailored compliance program for the China operations of a financial services company.**  
代表一家金融机构为其中国营运量身定制相关合规项目。
- **Conducted an internal assessment of anti-corruption compliance in China on behalf of an industrial manufacturer.**  
代表一家工业制造商针对其反腐败合规进行内部评估。
- **Assisted a multinational biopharmaceutical company with a compliance assessment of its operations in China.**  
协助一家跨国生物制药公司就其中国运营业务进行合规评估。
- **Advised a global financial services conglomerate on strategic implementation of compliance procedures at a joint venture with a Chinese state-owned enterprise.**  
代表一家跨国性金融集团为其与某中国国有企业成立合资公司的合规流程的战略实施提供法律咨询。
- **Conducted a compliance assessment of the China operations of a global food company.**  
代表一家全球食品公司对其中国运营业务进行合规评估。
- **Conducted a risk assessment of the China operations of a multinational clean energy company.**  
代表一家跨国清洁能源公司针对其中国业务开展风险评估。
- **As part of a global risk assessment for a trade association, conducted China-specific interviews of employees and third-party agents/representatives.**  
协助某行业公会开展全球风险评估并为其访谈特定中国员工与第三方代理/代表。
- **Updated and revised a multinational personal care products company's anti-corruption policies in China.**  
协助一家跨国个人护理产品公司及时更新并修订其在中国反腐败合规政策。
- **Adapted a global cosmetics company's anti-corruption policy to the local Chinese market.**  
代表一家全球性化妆品公司针对中国市场特定情况调整并执行其反腐败合规政策。
- **Tailored anti-corruption policies for a global oil company's operations in China.**  
为一家全球石油公司对其中国运营业务制定反腐败政策。

- **Conducted an anti-corruption risk assessment for a Japanese pharmaceutical company's operations in China.**  
代表一家日本医药公司针对其中国营运开展反腐败风险评估。
- **Revised a US financial service company's anti-corruption procedures as applied to a joint venture with a Chinese state-owned enterprise.**  
代表一家美国金融机构修订其与某中国国有企业成立的合资公司的反腐败流程。
- **Conducted a risk assessment of the China operations of a global entertainment company.**  
代理一家跨国娱乐公司对其中国业务开展风险评估。
- **Developed China-specific anti-corruption policies and procedures for a European financial services company.**  
代理一家欧洲金融机构针对其特定中国营运情况制订相关反腐败合规政策与流程。
- **Developed China-specific anti-corruption policies and procedures for a Japanese life sciences company.**  
代理一家日本生物科技公司针对其特定中国营运情况制订反腐败合规政策与流程。

## **Anti-Corruption Training 反腐败合规培训**

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- **Presented anti-corruption compliance training in Chinese to key employees at the Chinese subsidiary of a major US manufacturer.**  
代理一家大型美国制造商为其中国公司关键员工提供中文反腐败合规培训。
- **Presented anti-corruption compliance training in Chinese to key employees at the Chinese subsidiary of a multinational clean energy company.**  
代理一家跨国清洁能源公司为其中国子公司的关键员工提供中文反腐败合规培训。
- **Presented training to China-based employees of a global natural resources company.**  
代理一家跨国性天然资源公司为其中国地区员工提供培训。
- **Conducted anti-corruption training in Chinese and English for China-based employees of a multinational pharmaceutical company.**  
代理一家跨国医药公司为其中国地区员工提供中、英文双语反腐败合规培训。
- **Conducted anti-corruption training in Chinese for China-based employees of a multinational financial services company.**  
代理一家跨国金融机构为其中国地区员工提供中文反腐败合规培训。
- **Assisted a US agricultural company in developing anti-corruption training materials in Chinese and English.**  
代理一家美国农业公司为其中、英文双语的反腐败合规培训材料提供指导。
- **Presented multiple anti-corruption trainings in Chinese to employees of a Chinese state-owned enterprise with a minority investment by a US financial services company.**  
协助一家作为中国国有企业少数股东的美国金融机构为其员工多次提供中文反腐败合规培训。
- **Conducted anti-corruption training in Chinese and English for China-based employees of a US food company.**  
协助一家美国食品公司为其中国地区员工提供中、英文双语反腐败合规培训。

- **Drafted and presented compliance training in Chinese to employees of a joint venture between a Chinese state-owned enterprise and a US manufacturing company.**  
协助由中国某国有企业和美国某制造公司合资成立的公司为其起草中文员工合规培训材料并提供相应的培训。
- **Presented training to legal department personnel of a global medical device company.**  
为一家全球医疗器械公司法律部门人员提供培训。
- **Presented anti-corruption training to a hedge fund with significant operations in China and other parts of Asia.**  
代理一家在中国及亚洲其它地区均有大量业务的对冲基金公司为其提供反腐败合规培训。
- **Prepared and presented anti-corruption compliance training for China-based employees of a US medical device manufacturer.**  
代理一家美国医疗器械生产商为其中国地区的员工编制反腐败合规培训材料并提供相应的培训。
- **Drafted and presented compliance training for a multinational health products company.**  
代理一家跨国保健品公司为其起草合规培训材料并提供培训。
- **Drafted and presented compliance training in Chinese to employees of a joint venture between a Chinese state-owned enterprise and a US clean energy company.**  
代理一家由某中国国有企业和某美国清洁能源公司合资成立的公司为其起草中文员工合规培训材料并提供相应的培训。
- **Drafted and presented compliance training in China at an annual sales conference of an Asia-based technology company.**  
为一家亚洲科技公司就其在华年度销售会议起草并提供合规培训。
- **Drafted and presented compliance training in Chinese to sales, marketing, and management personnel of a multinational health products company.**  
代理一家跨国保健品公司为其销售、市场和管理人员起草中文合规培训材料并提供相应的培训。
- **Drafted and presented anti-corruption compliance training in Chinese to a cross-functional group of a healthcare company.**  
代理一家医疗保健公司为其起草跨部门中文反腐败合规培训材料并提供相应的培训。
- **Drafted and presented compliance training in Chinese to sales, finance, legal, and compliance personnel of a cosmetics company.**  
代理一家化妆品公司为其销售、财务、法务和合规人员起草中文合规培训材料并提供相应的培训。
- **Drafted and presented compliance training to a Chinese financial services company owned by a US hedge fund.**  
代理一家美国对冲基金旗下有的中国金融机构为其起草合规培训材料并提供相应的培训。
- **Presented compliance training to China-based employees of a global oil company.**  
为一家全球石油公司向其中中国员工提供合规培训。
- **Drafted and presented compliance training in Chinese to China-based employees of a US semi-conductor technology Company.**  
为一家美国半导体科技公司向其中中国员工起草并用中文提供合规培训。



- **Drafted and presented compliance training in Chinese to China-based employees of a US biotechnology company.**  
代理一家美国生物科技公司为其中国地区的员工起草中文合规培训材料并提供相应的培训。
- **Drafted and presented compliance training in Chinese to sales, finance, legal, and compliance personnel of an auto parts company based in six affiliates in mainland China and Taiwan.**  
代理一家汽车配件公司为其驻中国大陆的六家关联公司销售、财务、法务和合规人员起草中文合规培训材料并提供相应的培训。

## **Transactional Compliance / Due Diligence 交易合规 / 尽职调查**

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- **Advised a US consumer products company on its proposed acquisition of a Chinese distributor, including Advised on risks of criminal, civil, and administrative liability for past improper conduct by the distributor.**  
为一家美国消费品公司就其收购中国经销商的意向提供咨询，包括该经销商过去不当行为相关的刑事、民事及行政责任相关风险的咨询。
- **Conducted extensive due diligence on behalf of a US life sciences company into an investment into a Chinese company.**  
代表一家美国生命科学公司就其对一家中国公司的投资开展宽泛的尽职调查。
- **Assisted a global conglomerate with compliance due diligence on an acquisition of a Chinese industrial company.**  
协助一家全球性企业集团就其收购一家中国实业公司而开展合规方面的尽职调查。
- **Conducted targeted corruption-specific due diligence related to a US transportation company's investment in a state-owned enterprise in China.**  
代表一美国运输公司就其投资一家中国国有企业而开展有针对性的反腐败尽职调查。
- **Advised a US biotech company concerning the corruption risks associated with an acquisition in China.**  
代表一家美国生物科技公司就其在中国的收购行为提供腐败风险相关咨询。
- **Conducted targeted anti-corruption due diligence related to a US financial service company's investment in a state-owned enterprise in China, including interviews of the target's employees and transaction testing.**  
代表一家美国金融机构就其对中国某国有企业的投资开展针对性的反腐败尽职调查，包括访谈该国有企业员工并进行业务抽查。
- **Advised a personal care products company on revisions to its China gifts, meals, and entertainment policies.**  
为一家个人护理产品公司就其修改在中国提供礼品、餐饮和娱乐政策提供咨询。
- **Advised a global biopharmaceutical company on the compliance aspects of a joint venture with a Chinese pharma company, including compliance-specific due diligence and transactional documents.**  
为某全球性生物制药公司与中国制药公司的合资企业提供有关合规方面的咨询，包括合规尽职调查和业务文件审阅。
- **Advised on the due diligence process for an acquisition of a Taiwanese manufacturing company with significant China operations.**



就收购一家拥有大量在华业务的台湾制造企业的尽职调查程序提供咨询。

- **Advised a private equity firm on a joint-venture arrangement with an Indian company using a key manufacturing vendor based in China.**  
代表一家私募基金公司就其与一家主要生产代理商位于中国的印度公司之间签订的合资经营协议提供咨询。
- **Assisting a US personal care products company with anti-corruption due diligence into a joint venture partner in China.**  
协助一家美国个人护理产品公司就针对其中国合资伙伴进行反腐败尽职调查。
- **Advised a US manufacturer on the sufficiency of due diligence conducted on a Chinese company.**  
就一家美国生产商对中国某公司进行的尽职调查之充分性提供咨询。
- **Advised a European biotechnology company on the compliance-related provisions of a licensing agreement with China-based companies.**  
为一家欧洲生物制药公司与中国公司的许可协议中的合规条款提供咨询。
- **Advised a global non-governmental organization on the compliance risks of partnering with a local Chinese non-governmental organization based on certain due diligence findings indicating impropriety.**  
根据尽职调查结果所呈现的某些不正当行为，为一家全球性非政府组织与一家中国当地的非政府组织之间进行合作的合规风险提供咨询。
- **Advised a US life science company on anti-corruption aspects of a licensing deal with a Chinese partner.**  
为某美国生命科学公司与某中国合作伙伴的一项许可交易所涉及的反腐败事宜提供咨询。

## Compliance Counseling and Advice 合规咨询与建议

We provide ongoing compliance advice to more than 80 companies with operations in China. Selected recent matters include:

科文顿为 80 多家拥有在华业务的企业持续提供合规方面的咨询。部分近期代理业务包括：

- **Advised an industrial manufacturer on corruption-related issues with its sales representatives in China.**  
为某工业制造商就其中国销售代表所涉及的腐败相关问题提供咨询。
- **Advised a medical device company on corruption-related issues with its Chinese distributors.**  
为某医疗器械公司就其中国经销商所涉及的腐败相关问题提供咨询。
- **Advised a clean energy company with expatriate employees in China on anti-corruption compliance issues.**  
为一家外派员工至中国的清洁能源公司就其反腐败合规事宜提供咨询。
- **Advised a multinational financial services company on commercial bribery laws and the FCPA.**  
为一家跨国金融机构提供有关商业贿赂相关法律及美国《反海外腐败法》的咨询。
- **Advised a global natural resource company on provision of gifts, hospitality, and travel to employees of PRC government agencies and state-owned enterprises.**

为一家跨国天然资源公司就其向中国政府机构和国有企业员工提供礼物、招待和差旅方面的规定提供法律咨询。

- **Assisted several global pharmaceutical companies on policies and procedures for interactions with healthcare professions and compliance with local law.**  
协助若干家全球性医药公司制定与医护人员往来和地方法律合规方面的相关政策和流程。
- **Advised a global financial services company on corruption risks related to hiring of a well-connected third-party agent.**  
为一家跨国金融机构聘用某具有良好社会关系的第三方代理所存在的腐败风险进行评估。
- **Advised a technology company on the establishment of an advisory council in China that would include executives of state-owned enterprises and current and former PRC government officials.**  
为一家科技公司就其在中国成立顾问委员会且该委员会成员将包括中国国有企业管理人员及在职与前任中国政府官员而提供法律咨询。
- **Assisted a global pharmaceutical company in understanding a director's liability for improper acts by the company or its employee.**  
指导一家跨国医药公司明晰其董事对公司或公司员工的不当行为所应承担的责任。
- **Advised a telecommunications company on the hiring of a consultant affiliated with a state-owned enterprise.**  
为一家电信公司就聘用国有企业员工为其顾问的相关事宜提供咨询。
- **Advised a multinational advertising firm on the compliance risks of irregular financial interactions with customers in China.**  
为一家跨国广告公司就其与中国客户的非正常财务交易的合规风险提供咨询。
- **Advised multiple pharmaceutical and medical device companies on donations to healthcare institutions in China.**  
就多家医药及医疗设备公司向中国医疗机构进行捐赠事宜提供咨询。
- **Advised a US company after a senior manager was the subject of a false report to Chinese authorities in southern China as having participated in a bribery scheme.**  
为一家美国公司就一份给中国华南地区政府部门的错误报道中提到其高级经理参与贿赂的事宜后提供咨询。
- **Advised a real estate company on the provision of gifts, entertainment, and travel to employees of Chinese state-owned enterprises.**  
为一家房地产公司向中国国企员工提供礼物、娱乐和差旅的相关事宜提供咨询。
- **Advised an industry automation company on due diligence of distributors in China.**  
为一家行业自动化公司对其中国经销商的尽职调查提供咨询。
- **Advised a US medical device company regarding termination of a local distributor for improper conduct.**  
为一家美国医疗器械公司因其当地经销商的不当行为而被吊销资格事宜提供咨询。
- **Advised a leading Chinese telecommunication company on FCPA jurisdictional issues.**  
为一家行业领先的中国电信公司就美国《反海外腐败法》管辖范围提供咨询。
- **Advised a US medical diagnostics company on the compliance risks of sponsoring certain medical conferences.**

为一家美国医疗诊断公司关于赞助某些医学会议的合规风险提供咨询。

- **Advised a US mining company regarding the risks of engaging a third-party consultant in interacting with a large Chinese state-owned enterprise.**

为一家美国矿业公司就其聘请第三方顾问与某中国大型国企进行接触所涉及的相关风险提供咨询。

- **Advised a European energy company on corruption risks related to certain banking transactions with a Chinese state-owned energy company.**

为一家欧洲能源公司就其与中国某国有能源公司进行特定银行业务交易所涉及的腐败风险提供咨询。

- **Advised a biopharmaceutical company on the risks of engaging as consultants certain experts who were also retained by Chinese food and drug authorities.**

为一家生物制药公司关于聘用兼任中国食品药品政府部门的专家担任顾问的风险提供咨询。

- **Advised a global technology company on corruption risks related to donations to certain PRC government agencies.**

为一家全球性科技公司就其向中国某政府机构进行捐赠所涉及的腐败风险提供咨询。

- **Advised a US technology company on modifications to its corporate structure in China after an internal investigation revealed kickbacks to Chinese state-owned entities.**

因内部调查发现向中国国有企业提供回扣的行为，而为一家美国科技公司提供其中国公司架构重组的法律咨询。

- **Advised a US healthcare company on sponsoring travel of physicians to attend a conference in Europe.**

为一家美国医药公司就其赞助医生去欧洲参加会议事宜提供咨询。

- **Advised a global technology company on gift cards and commercial bribery issues.**

为一家全球性技术公司提供有关礼品卡和商业贿赂事宜的咨询。

- **Advised a global medical device company on consulting agreements with physicians in China.**

为一家全球性医疗器械公司就其与中国地区的医生之间咨询协议提供咨询。

- **Advised a US company on the FCPA implications of gifts to employees of Chinese trade associations.**

为一家美国公司向中国行业协会员工送礼所涉及的美《反海外腐败法》相关问题提供咨询。

- **Advised a US biotechnology company on the corruption risks of sponsoring certain international travel and training for physicians in China.**

为一家美国生物制药公司赞助中国医生进行国际旅行和培训所涉及的腐败风险提供咨询。

- **Advised a US-listed Chinese company on the adequacy of due diligence on an intermediary.**

为一家在美国上市的中国公司对某中介机构进行尽职调查之充分性提供相关咨询。

- **Advised a global hedge fund on the adequacy of due diligence on certain China-based consultants.**

为一家跨国对冲基金公司就其对某些中国顾问进行尽职调查的合理性提供相关咨询。

- **Advised a multinational medical device manufacturer on the corruption risks related to certain procurements irregularities in a sale to a hospital in China.**  
为某跨国医疗设备生产商就其向中国某医院的销售存在的不合规采购事宜提供腐败风险咨询。
- **Advised a construction materials company on the risks of engaging a distributor with certain red flags.**  
为某建筑材料公司就其与存在一定风险的经销商进行合作而提供相关咨询。
- **Advised a global IT company on privileged issues related to communications with a compliance officer at a joint venture with a state-owned enterprise in China.**  
为一家跨国 IT 公司与中国某国有合资企业的合规官员之间的沟通交流所涉及的保密事宜提供咨询。
- **Advised a personal care products company on certain sponsorships and donations to state-owned media companies.**  
为一家个人护理产品公司赞助及对某国有媒体公司进行捐赠的事宜提供咨询。
- **Advised a trade association regarding certain interactions with Chinese academics.**  
为一家行业协会与中国学者的相关往来提供咨询。
- **Advised a multinational media company regarding dealings with a state-owned film group after a senior official at the film group was investigated for irregularities.**  
某国有影视集团高级官员因违纪接受调查背景下，为一家跨国媒体公司就其与该影视集团之间的往来事宜提供咨询。
- **Advised a global cosmetics company regarding holiday gifts to Chinese government officials.**  
为一家跨国化妆品公司向中国政府官员的赠送节日礼品事宜提供咨询。
- **Advised a global equipment company on the risks of selling through certain second-tier distributors affiliated with government officials.**  
为一家跨国设备公司通过某些与政府官员有关联的二级经销商进行产品销售所存在的风险提供咨询。
- **Advised a US biotechnology company on interactions with a Chinese joint venture partner after bribery allegations were made against a principal of the JV partner.**  
一家美国生物科技公司的中国合资企业合作伙伴受到贿赂指控背景下，为该公司与该合作伙伴之间的往来事宜提供咨询。
- **Advised a multinational healthcare company regarding payments to third-parties in China.**  
为一家跨国医疗保健公司对中国第三方公司的付款事宜提供咨询。
- **Advised a consumer products company on sponsoring travel of Chinese quality officials to travel to the company's factory.**  
为一家消费品公司向到该公司工厂进行视察的中国质量检测官员支付差旅费用事宜提供咨询。
- **Advised a US diagnostics company about the risks of engaging a distributor to serve as its registration agent in China.**  
为一家美国诊断公司聘请经销商作为其在华注册代理人所涉及的风险提供咨询。

- **Advised a financial services company on the risks of engaging an auditor for its Chinese joint venture after the auditor came under scrutiny by PRC regulatory authorities.**  
在一家金融机构为其中国合资企业聘请的某审计师受到中国监管部门的审查后就聘请该审计师所涉及的风险提供咨询。
- **Advised a US pharmaceutical company on the compliance risks of conducting certain clinical trials in China with a third party after red flags were raised.**  
发现存在不当行为的征兆，为一家美国医药公司与第三方在中国共同进行某些临床实验的所涉及的合规风险为其提供咨询。
- **Advised a multinational medical device company about risks of engaging a distributor after diligence identified that former employees of the distributor had been convicted of bribery in China.**  
为一家跨国医疗器械公司关于尽职调查发现一家经销商前员工在中国有贿赂犯罪记录后是否雇佣该经销商的风险提供咨询。
- **Advised a media company on a forward-looking crisis management strategy in China.**  
为一家媒体公司在中国的前瞻性危机管理策略提供咨询。
- **Advised a US biotechnology company on compliance risks of interactions with contract manufacturers in China.**  
为一家美国生物科技公司在华接触合约制造商所涉及的合规风险提供咨询。
- **Advised a multinational manufacturing company on the risks of dealing with certain third-party construction and distribution entities in China.**  
为一家跨国制造业公司与中国某第三方建筑与经销公司之间往来所存在的风险提供咨询。
- **Advised a global company on best practices for compliance monitoring of joint ventures with government-affiliated entities.**  
为一家跨国公司与政府相关企业组建合资公司所涉及的合规监控提供最佳实践方案。
- **Advised a global medical device company on a proposed donation to a Chinese hospital.**  
为一家跨国医疗器械公司就其向某中国医院拟赠的事宜提供咨询。
- **Advised a multinational power manufacturer on updating its third-party diligence and contracting procedures after irregularities were detected.**  
为一家跨国电力生产商就发现不合规行为后对其第三方尽职调查和签署协议流程的更新提供咨询。
- **Advised a multinational financial services company on the risks of sponsoring certain travel for employees of a state-owned entity and family.**  
为一家跨国金融机构为某国有企业雇员及家人提供差旅费用所涉及的风险提供咨询。
- **Advised a global electronics company on compliance issues with its joint venture partner in China.**  
为一家跨国电子公司及其中国合资伙伴的合规事宜提供咨询。



If you have any questions concerning the material discussed in this document, please contact any of the following senior members of our Global Anti-Corruption/FCPA team:  
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