

Compliance in Cartel Cases



International Competition Network Compliance Webinar

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Key Features

- Not “one size fits all”
- Must be tailored to company and industry
- Must be part of culture of company

Benefits

- Prevent cartel activity
- Detect and self-report cartel activity
- Leniency
- Possible penalty reductions
- Avoid court-imposed probation

Probation Examples

- AU Optronics (2012)
 - 3 years probation with quarterly compliance reporting, plus independent compliance monitor
- Bridgestone Corp. (2014)
 - 3 years probation with annual compliance reporting
- Hoegh Autoliners (2017)
 - 3 years probation with annual compliance reporting, plus independent compliance monitor

Current Efforts

- Continued evaluation
- Input from interested parties