

## November 2025



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The better the question. The better the answer. The better the world works.

- **Conduct or recalibrate risk assessments – particularly in regions known for cartel or TCO activity:** Organizations should assess operations and business activity particularly in regions known for cartel or TCO activity, such as Mexico, the Southwest United States, Central and South America, the Caribbean, and parts of Africa. Conducting and refocusing risk assessments will help companies operating in at-risk regions and markets respond proactively to the increased risk of scrutiny, investigation and enforcement actions due to the DOJ's current stance on engagements.
- **Enhance third-party due diligence activities:** Organizations should adopt and enhance due diligence practices that identify associations within operations or business partners to determine that their business is not associated with the criminal activity of cartels or TCOs by performing beneficial ownership information checks. The FCPA may be applied in conjunction with laws that will result in enforcement actions taken against companies for providing material support to terrorism.
- **Focus compliance programs on high-risk and high-impact areas:** Businesses are encouraged to continue to proactively implement effective compliance measures that consider all high-risk and high-impact areas, as the DOJ's guidance indicates that it is prioritizing investigations of serious misconduct. This should extend across FCPA, as well as anti-money laundering (AML) emerging trends, risks and schemes, particularly in high-risk markets and product offerings. These program assessments should also account for recent administrative and regulatory pronouncements.
- **Leverage in-house data and available tools to identify potential areas of concern:** Organizations should take advantage of customer, ownership, transaction and other data sources in concert with external public or subscription-based data sources to routinely monitor for emerging risks, AML or FCPA typologies, changes in client ownership, or other regulatory-driven priorities.
- **Enhance compliance training:** Organizations should enhance their compliance training, including the awareness and identification of potential TCO and cartel activity in business operations.

## Teaming with EY Forensic & Integrity Services

EY Forensic & Integrity Services is a leader in providing anti-bribery and anti-corruption (ABC)-related services in the financial services industry. Our US and global networks enable tailored approaches to address complex ABC challenges. Presented below is a selection of the ways we can assist your organization navigate the changing regulatory environment:

- Conduct or refresh program assessments to identify gaps and opportunities for remediation, as well as assess the program's current state against the leading practices of peers
- Investigate allegations of wrongdoing internally by employees or externally by third-party vendors and contractors
- Leverage our suite of leading-edge analytics tools and workflow capabilities to augment or support financial services clients in identifying, monitoring or investigating patterns of potentially suspicious activity
- Develop and/or conduct role-specific training tailored to enhancing employees' understanding of the organization's risks and enhance the detection of TCO and cartel activity
- Guide the revision and enhancement of existing policies and procedures to align with the updated FCPA guidelines

## Selected qualifications

- We conducted an AML investigation for a large financial institution that included the review of a complex network of accounts and subaccounts to identify atypical patterns and potential affiliations with cartels or terrorist organizations. EY professionals conducted due diligence on the transacting parties and prepared detailed case summaries to support Suspicious Activity Report (SAR) determinations. The analysis performed revealed unusual patterns indicative of cartel-related abuse of the financial institution.
- We conducted an ABC risk assessment for a leading provider of financial guaranty insurance as it expands into new geographic and product markets. EY professionals interviewed key company personnel and reviewed existing compliance frameworks to identify risks and propose recommendations.
- We performed pre-acquisition ABC due diligence for a leading private equity group's purchase of a global real estate corporation. We assessed the target entity's compliance framework and selected high-risk subsidiaries for transaction testing and business intelligence screening.

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### About EY Forensic & Integrity Services

Embedding integrity into an organization's strategic vision and day-to-day operations is critical when managing complex issues of fraud, regulatory compliance, investigations and business disputes. Our international team of more than 4,000 forensic and technology professionals helps leaders balance business objectives and risks, build data-centric ethics and compliance programs, and ultimately develop a culture of integrity. We consider your distinct circumstances and needs to assemble the right multidisciplinary and culturally aligned team for you and your legal advisors. We strive to bring you the benefits of our leading technology, deep subject-matter knowledge and broad global sector experience.

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