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the legal profession®

# The impact of corruption on the legal profession: an updated global picture



## 2024 SURVEY REPORT

International Bar Association Anti-Corruption Committee  
and Legal Policy & Research Unit

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# Executive summary

In late 2023, the IBA Anti-Corruption Committee and the Legal Policy and Research Unit (LPRU) launched Phase 2 of the IBA's Anti-Corruption Strategy for the Legal Profession. This featured a second global survey of anti-corruption in the legal profession (2024 survey), building on the IBA's foundational 2010 anti-corruption survey (2010 survey).

This report sets out the results of the 2024 survey and provides updated insights into corruption risks, trends and safeguards, emphasising changes since 2010 and the state of the current global landscape.

The 2024 survey reveals progress in global anti-corruption awareness and training since the 2010 survey, but also emphasises persistent challenges:

- over half of respondents continue to view corruption as a prevalent issue for the profession, with markedly higher levels of concern in Africa and Latin America;
- 45 per cent of respondents globally observed an increase in levels of corruption within their jurisdiction over the last decade; and
- in certain regions and practice areas, lawyers' access to anti-corruption training and beneficial ownership information correlates with reduced perceptions of corruption risk, although gaps remain.

This report recounts:

- background to the 2024 survey, including key findings from the 2010 survey);
- the 2024 survey's methodology, focus, and respondents' demographics;
- findings from the 2024 survey (for a snapshot, please refer to '**Key findings**' on page 9); and
- the IBA's current plans on 'what's next' following the 2024 survey's results.

Notwithstanding advancements since 2010, results from the 2024 survey reflect the need for continued collaboration to combat corruption globally.

# Background

In 2010, as part of the IBA's Anti-Corruption Strategy for the Legal Profession, the IBA's Anti-Corruption Committee, with assistance from the LPRU, Organisation for Economic Cooperation and Development (OECD) and United Nations Office on Drugs and Crime (UNODC), undertook its first survey into the risks and threats of corruption within the global legal profession.<sup>1</sup>

Overall, the 2010 survey indicated that:

- roughly half of all respondents perceived corruption to be an issue in the legal profession in both their home and neighbouring jurisdictions; a significant number of lawyers reported being approached to act as an agent or middleman in a transaction that reasonably could be suspected to involve international corruption;
- there was a marked lack of awareness of international anti-corruption laws and instruments among legal professionals; and
- respondents did not perceive that their bar associations, law societies or law firms were engaging actively with the issues of international bribery and corruption.

To address these issues the IBA, in partnership with OECD and UNODC, undertook multiple anti-corruption compliance workshops across different jurisdictions, which were hosted in collaboration with regional bars, law societies and law firms. In 2013, the IBA, OECD and UNODC undertook an additional global survey of in-house lawyers aimed at better understanding how businesses were managing the corruption risks posed by engaging external legal counsel.<sup>2</sup> In the same year, the IBA's Anti-Corruption Committee and LPRU published *Anti-Corruption Guidance for Bar Associations*.<sup>3</sup> The IBA also released several reports and publications to further this work.<sup>4</sup>

Much has changed in the legal landscape since then. The development of new laws – both hard and soft – and the increasingly interconnected nature of the legal profession have had an impact on how lawyers operate. Our profession's collective understanding of what constitutes corrupt conduct, and how it can be addressed, needs to take into account such changes and respond accordingly.

To better understand the current context, the IBA's Anti-Corruption Committee and LPRU launched a second global survey into anti-corruption in the legal profession in 2024.

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1 Available at <https://www.ibanet.org/MediaHandler?id=AE4B6ED2-4871-487B-B653-31424494D97B>, accessed 11 February 2025.

2 IBA, OECD and UNODC, *Anti-Corruption Compliance and the Legal Profession*, October 2013.

3 Available at <https://www.ibanet.org/resources>, accessed 11 February 2025.

4 Further details are available from the IBA Anti-Corruption Committee's homepage: <https://www.ibanet.org/unit/Criminal+Law+Section/committee/Anti-Corruption+Committee/3119>, accessed 11 February 2025.

# Survey methodology and focus

The 2024 survey was designed with the assistance of anti-corruption experts, including officers and members of the IBA Anti-Corruption Committee and lawyers from LPRU.

The 2024 survey provided the following definition of corruption (including foreign bribery):

*While neither the IBA nor the Organisation for Economic Cooperation and Development (OECD) has a standard definition of ‘corruption’, one frequently used definition that covers a broad range of corrupt activities is the ‘abuse of public or private office for personal gain’.*

*‘Foreign bribery’ involves companies or individuals promising or giving a bribe to a foreign official to win advantages in an international business transaction, such as winning a construction contract, an oil or gas concession, or an operating licence.<sup>5</sup>*

The 2024 survey aimed to explore what is working and what has changed since the 2010 survey in terms of global regulations and best practices, at both a bar/law society and law firm level. It also aimed to elicit lawyers’ opinions on the evolution of laws and regulations designed to combat the transfer of ‘illegal assets’ within their jurisdictions.

Additionally, the 2024 survey contained several questions designed with a specific focus on the existence and effectiveness of anti-corruption and anti-money laundering legislation at a global level.

Overall, it was hoped that the 2024 survey would help provide a snapshot of global attitudes concerning whether the risks posed to, and levels of corruption within, the profession had increased or decreased in the years since the 2010 survey. The survey was also designed to assess whether bar associations, law firms and law societies were engaging more effectively on these issues.

One advantage of the 2024 survey compared to its predecessor was the methodological ability to introduce and determine a corruption ‘Risk Index’ and ‘Risk Trajectory’ score for each of the different regions and areas of legal practice surveyed. A **Risk Index Score** can be used to demonstrate the current risk posed by corruption within a region or practice area. A **Risk Trajectory Score** can be used to map future trends towards greater or lesser levels of corruption within those same groups.

Both regional and country-specific **Risk Trajectory Profiles** can be found in Annex 1 of this report. Although overreliance on this data should be cautioned against given low response rates in certain jurisdictions, it should be noted that the overall trajectory of these results is in line with findings in other studies, such as Transparency International’s Corruption Perception Index and the World Justice Project Rule of Law Index.

Please note that the figures found in the graphs in this report are rounded to the nearest decimal place.

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<sup>5</sup> A copy of the introduction to the survey and questions can be found in Annex 2 of this report.

# Survey demographics

The 2024 survey was conducted between November 2023 and April 2024, and was open to legal practitioners from all jurisdictions. Approximately 1,300 responses were received. Figure 1 (below) shows the demographics of those responding to the survey.

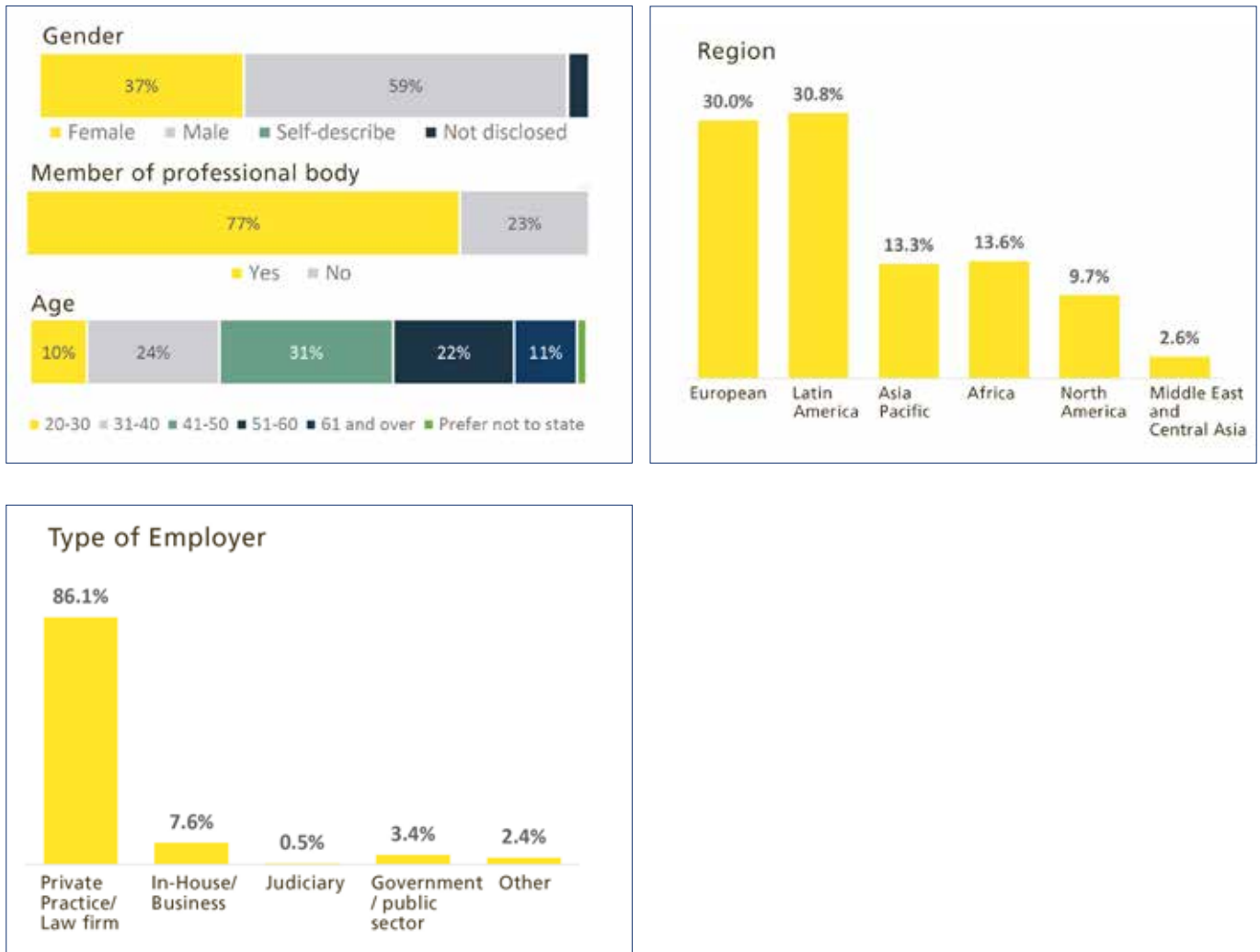


Figure 1: survey demographics

The majority of responses were received from practitioners in Europe and Latin America. As indicated above, the survey received minimal responses from Central Asia and the Middle East, as compared with other regions, and, as such, any results relating to those regions should be interpreted with particular caution.

Almost all respondents worked in private practice and/or law firms, with the remainder working in-house or within the government sector. Only a small number of respondents came from the judiciary. Responses were also received from those working in academia, at non-governmental organisations, legal consultancies and legal regulators.

# Overview of results

Promisingly, the 2024 survey results indicate a marked increase in lawyers' understanding of international anti-corruption laws and instruments compared to 2010.

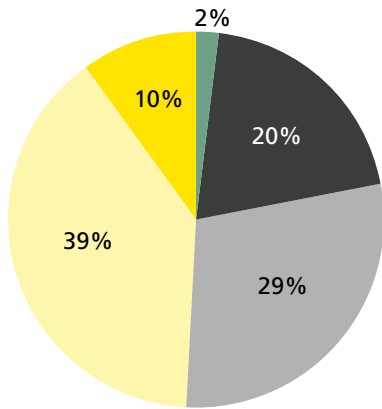
However, the results also indicate that there is much work left to be done, as the key findings on the next pages demonstrate. Over half of the responses received indicated that corruption remains common, or very common, within the profession. This rose to almost nine in ten respondents from Africa, and six in ten from Latin America. Forty-five per cent of respondents said they had seen an increase in corruption in the decade preceding the survey.

This report sets out the changes (and challenges) demonstrated by the survey data. We hope that the findings contained in the report will prove to be a useful tool in the global fight against corruption in the legal profession, both in terms of evaluating our profession's progress to date and identifying areas to target for improvement.



# Key findings

## How common is corruption in our profession?

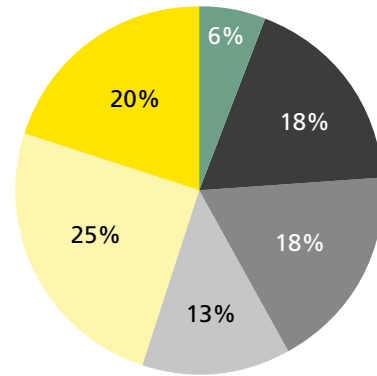


Almost **half of respondents** considered corruption to be **very common, or quite common**, among the legal profession.

■ Don't know ■ Very common ■ Quite common ■ Rarely ■ Never

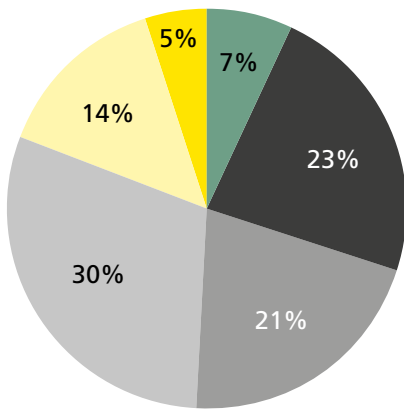
## Likelihood of reporting

Respondents were almost **evenly split** as to whether they would be somewhat or highly unlikely to **report corrupt conduct**, or somewhat or highly likely.



■ Don't know ■ Neither likely or unlikely  
 ■ Highly unlikely ■ Somewhat likely  
 ■ Somewhat unlikely ■ Highly likely

## How have levels of corruption changed since 2014?

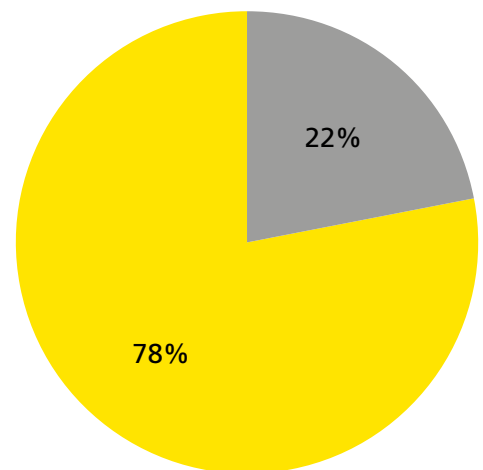


Almost **half** of respondents considered that corruption had **somewhat or significantly increased** since 2014.

■ Don't know ■ Significantly increased  
 ■ Somewhat increased ■ About the same  
 ■ Somewhat decreased ■ Significantly decreased

## Awareness of laws outside jurisdiction

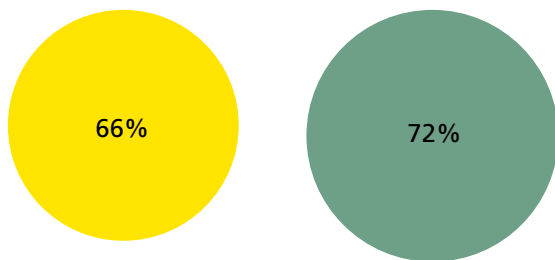
**The vast majority** of survey respondents felt they were aware of the **extra-territorial impact of anti-corruption/money laundering laws** outside their home jurisdiction.



■ No ■ Yes

## Training

Globally, **at least two-thirds of respondents** had received **anti-corruption training**.



■ Yes - anti-corruption ■ Yes - anti-money laundering

## Higher-risk factors

The 2024 survey identified the following characteristics, which, on balance, lead to a higher corruption Risk Index Score:<sup>6</sup>



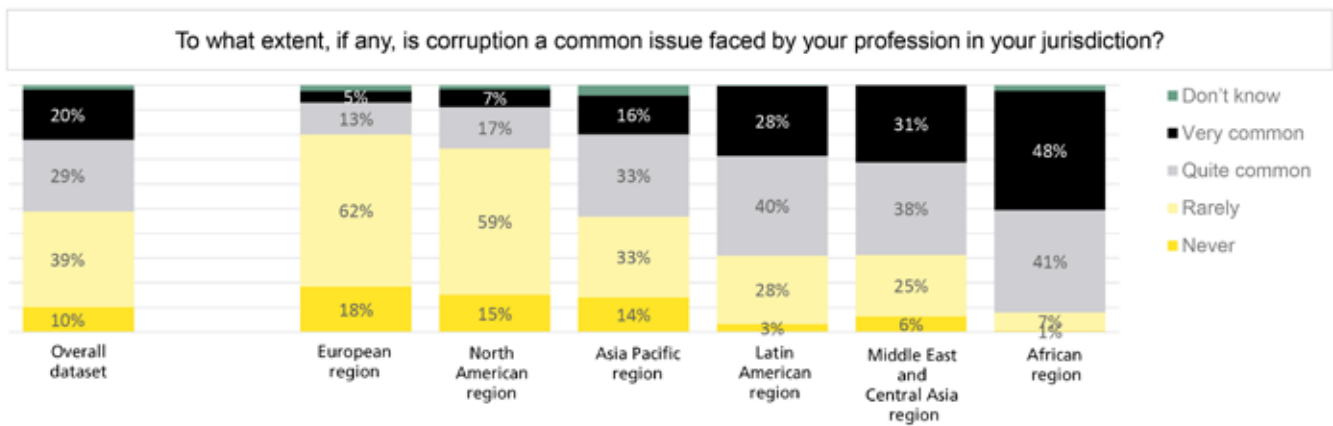
<sup>6</sup> For further details regarding the Risk Trajectory profiles of each region, practice area and countries surveyed, refer to Annex 1 of this report.

# Findings in detail

## Prevalence of corruption and changes over time

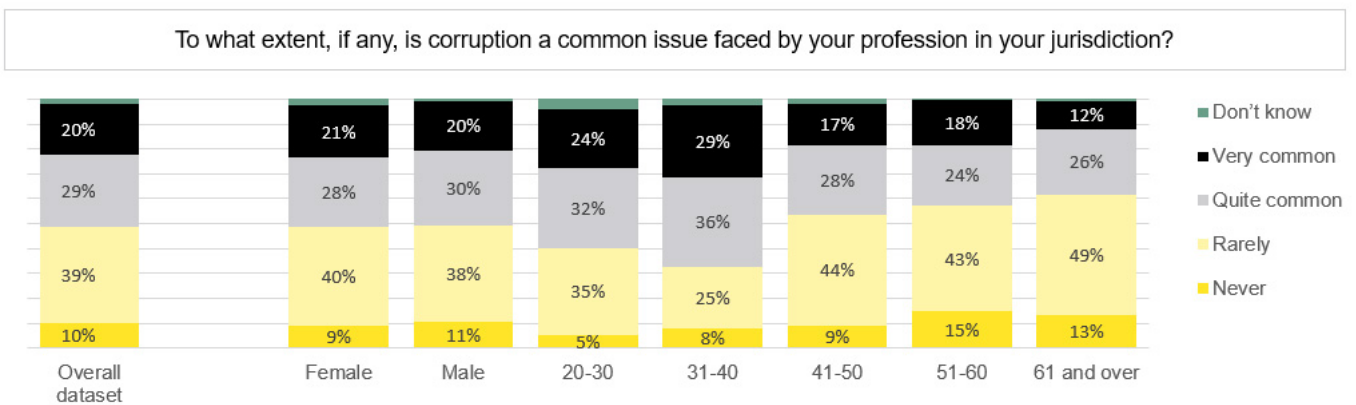
### Region

The majority of respondents from the African, Latin American, the Middle East and Central Asian regions described corruption as a quite common, or very common, issue in their home jurisdictions. In the Asia Pacific region, almost half of respondents described corruption as quite common, or very common. In Europe, the proportion dropped to under one in five respondents, and under one in four respondents in North America.



### Age and gender

Perception of corruption as a common issue was relatively equal across genders. On balance, the survey results indicate that lawyers with a younger age profile tend to see corruption as a more common issue faced by the profession. In particular, over half of respondents aged 20-30 and 31-40 respectively saw corruption as a common, or very common issue.



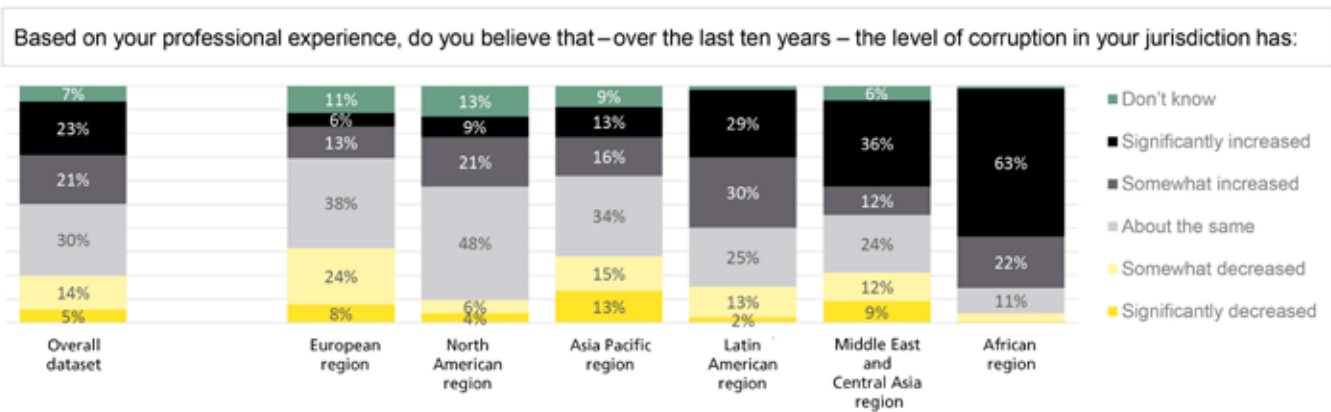
## Practice areas

In terms of areas of practice, Aviation, Public Law, Human Rights, Criminal and White Collar/ Compliance showed the greatest corruption risk profiles. However, Aviation and Human Rights as practice areas received a low number of survey responses,<sup>7</sup> meaning this result should be interpreted with caution with respect to these areas, based on the small sample set.

More details of the **Risk Trajectory Profiles** of different practice areas can be found in Annex 1 of this report.

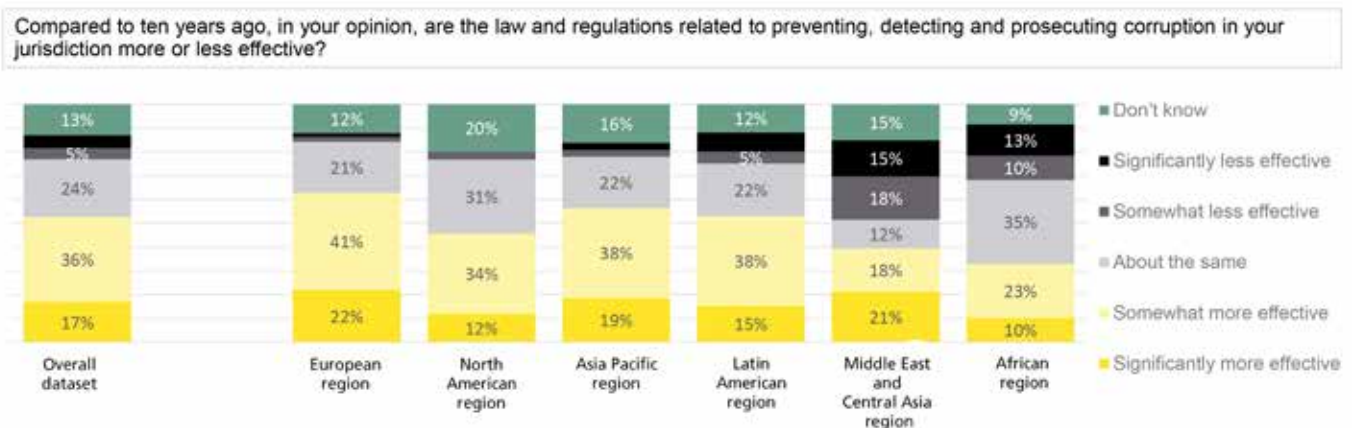
## Overall

The global outlook is one of a net increase in perceived levels of corruption. The only regional exception to this is Europe, which had the largest percentage of respondents indicating that the level of corruption had somewhat or significantly decreased.



## Impact of laws and regulations

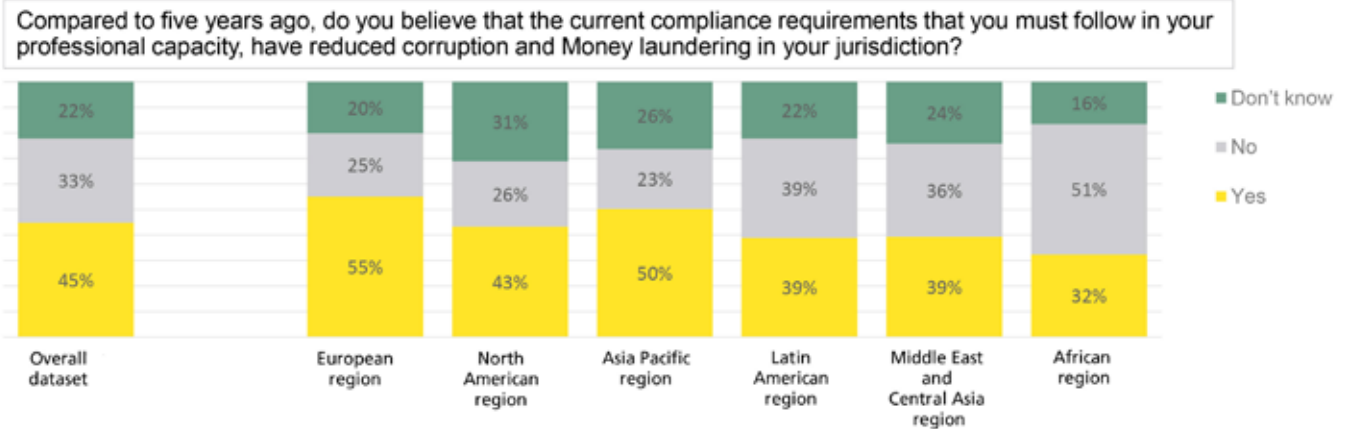
In relation to the impact of laws and regulations in respondents' home jurisdictions over the past decade, respondents were generally positive about these being effective. However, a quarter of respondents globally did not consider that the effectiveness of laws and regulations had changed much during this time.



<sup>7</sup> Aviation and Human Rights both accounted for less than one per cent of total responses respectively.

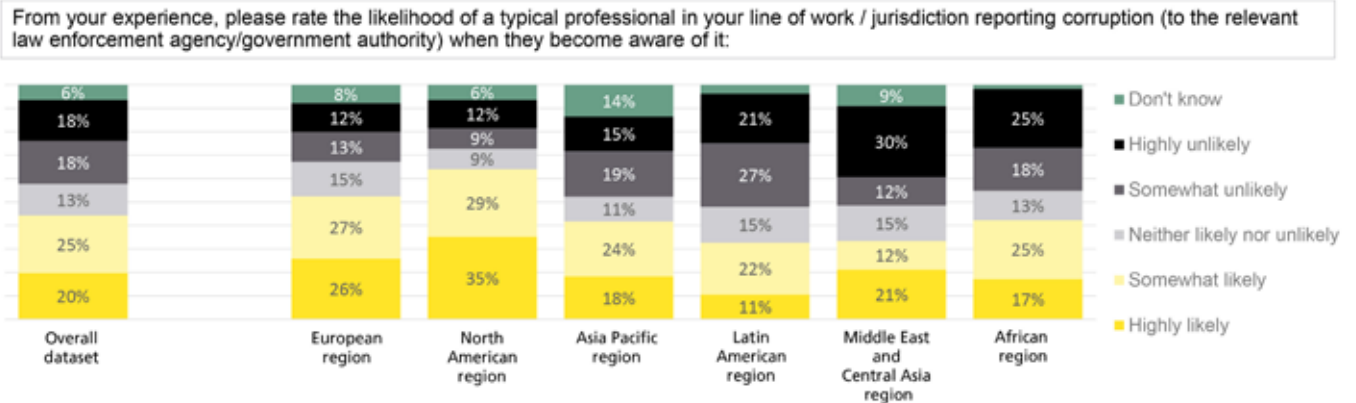
## Compliance requirements

Apart from the African region, at least a third of respondents felt that compliance requirements had reduced levels of money laundering and corruption in their home jurisdictions (rising to half of respondents in the European and Asia Pacific regions).



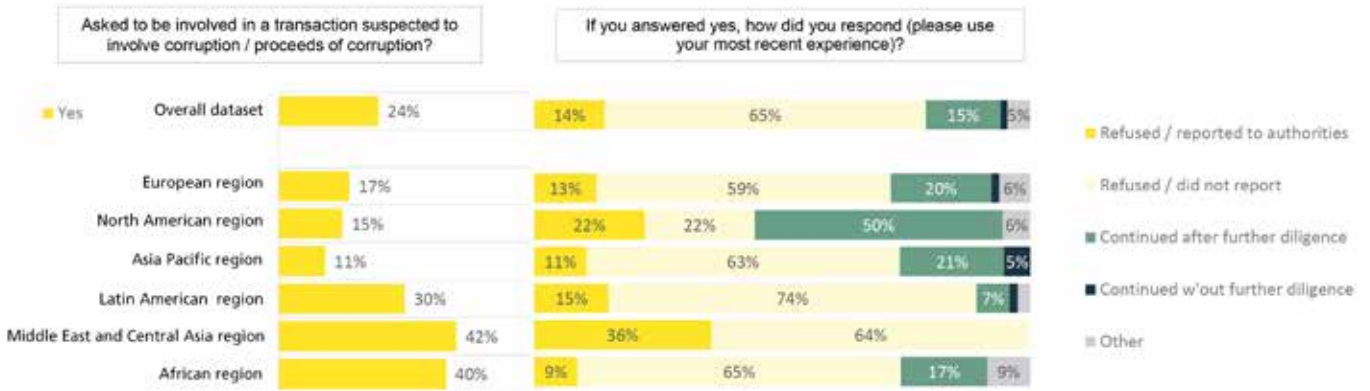
## Likelihood of reporting

A quarter of respondents from Africa, one in five from Latin America, and almost a third from the Middle East and Central Asian regions felt it was highly unlikely that corruption would be reported by a typical professional. This was only the case for over one in ten respondents from Europe and North America.



## Personal experience with corruption

A quarter of respondents reported personal experiences of being asked to involve themselves in a transaction which they suspected to involve corruption. Of those who had not reported their suspicions to authorities, however, only a very small minority proceeded without further due diligence.



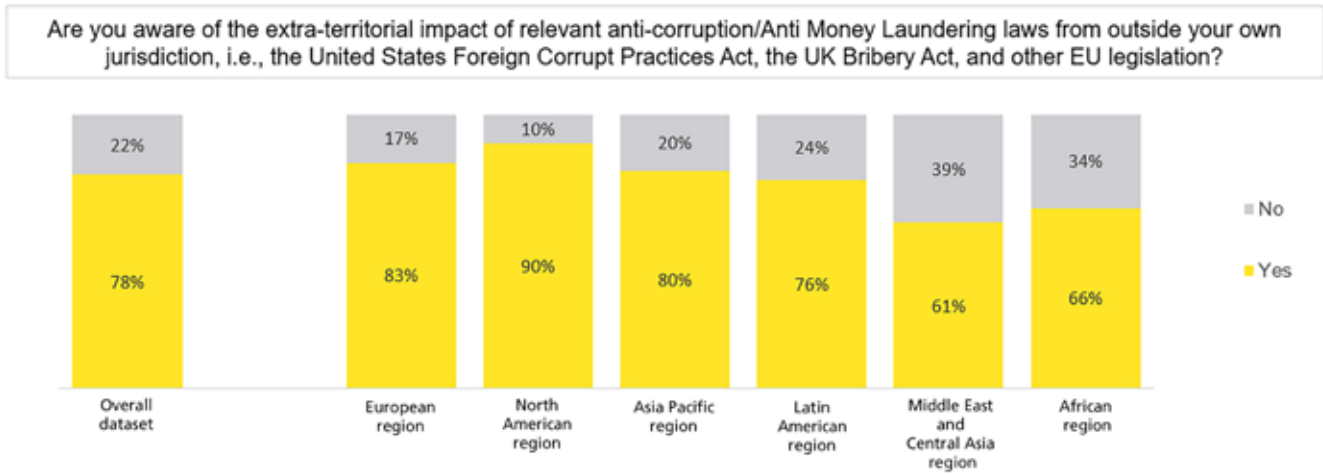
Respondents from Africa, Latin America, the Middle East and Central Asia were more likely than not to believe that they had lost business to others who were prepared to make illicit payments (as opposed to 75 per cent of North American respondents, who did not feel this was the case).

Over half of survey respondents claimed that they had not experienced a corruption risk outside the principal jurisdiction in which they practice. However, almost two-thirds of respondents also claimed to have never conducted due diligence on the corruption risk of a law firm based in another jurisdiction.



## Awareness of laws outside of home jurisdiction

The vast majority of 2024 survey respondents felt that they were aware of the extraterritorial impact of anti-corruption/money laundering laws outside their home jurisdiction. However, this was not so much the case in Africa, the Middle East and Central Asia.



This represents a promising improvement since the 2010 survey results, which indicated that respondents were generally unaware of the impact of national legislation with extraterritorial application.<sup>8</sup>

A number of anti-corruption laws have been enacted since the 2010 survey, which may account for some improvement in awareness among respondents about national laws with extraterritorial application (due to the proliferation of this type of legislation). These include, by way of example, *Law No 12,846 of 1 August 2013* (the ‘Clean Company Act’) (Brazil, passed into law 2013); the *Transparency, Anti-Corruption and Economic Modernisation Act 2016-1691* (‘Loi Sapin II’) (France, 2016); *The Bribery Act* (No 47 of 2016) (Kenya, 2016); and *Law 27.401* (the ‘Corporate Criminal Liability Law’) (Argentina, 2017).

## Safeguards

### *The impact of corruption safeguards on Risk Trajectory scores*

Globally, the 2024 survey data showed a positive correlation between the number of safeguarding tools available to practitioners (training, guidelines, policies and certifications and beneficial ownership information) and their perceptions of the corruption trajectory of their jurisdiction.

<sup>8</sup> See pp16-18 of the 2010 survey report.



Figure 2: survey responses on the impact of safeguards on corruption risk

This trend held true across all regions, regardless of whether an individual had personal experience of being asked to act on a transaction suspected to involve corruption.

This trend has positive implications for the use of corruption safeguarding tools as an effective means of combatting corrupt practices.

### *Anti-corruption training*

Globally, at least two-thirds of respondents had received anti-corruption training, with the figure being even greater for anti-money laundering training.

Corruption training predominantly came from respondents' employers, noting this trend may be reflective of the fact that many of the respondents work within law firms.

Globally, however, corruption risk profiles at a regional and practice area level were unaffected by whether anti-corruption training had or had not taken place, though there was some regional variation demonstrating an increased risk where training had not occurred (North America being the exception to this).

### *Anti-money laundering training*

By contrast, having specific anti-money laundering training in place appears to correlate more strongly with a reduced corruption risk profile globally.

However, again, there is some regional nuance to these results. In North America, the risk is higher where training has occurred, although this may be linked to the prevalence of responses from higher-risk practice areas in that region.





Figure 3: survey responses on the impact of training on corruption risk

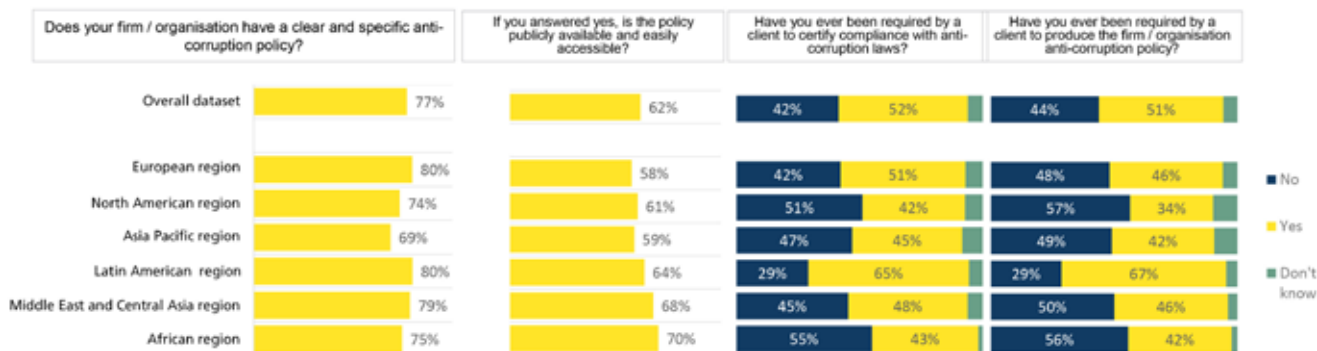
### Corruption guidelines, policies and certifications

Globally, over three-quarters of respondents indicated that their firm or organisation had a clear and specific anti-corruption policy.

Just over half of all respondents indicated that they had been required by a client to certify compliance with anti-corruption laws, as well as to produce their firm or organisation’s anti-corruption policy. The survey data indicates that this was most likely to be the case for Latin American respondents.

These results demonstrate a marked increase in client awareness of anti-corruption due diligence practices since the 2010 survey, where most respondents had been asked by less than 25 per cent of clients to demonstrate anti-corruption compliance.<sup>9</sup>

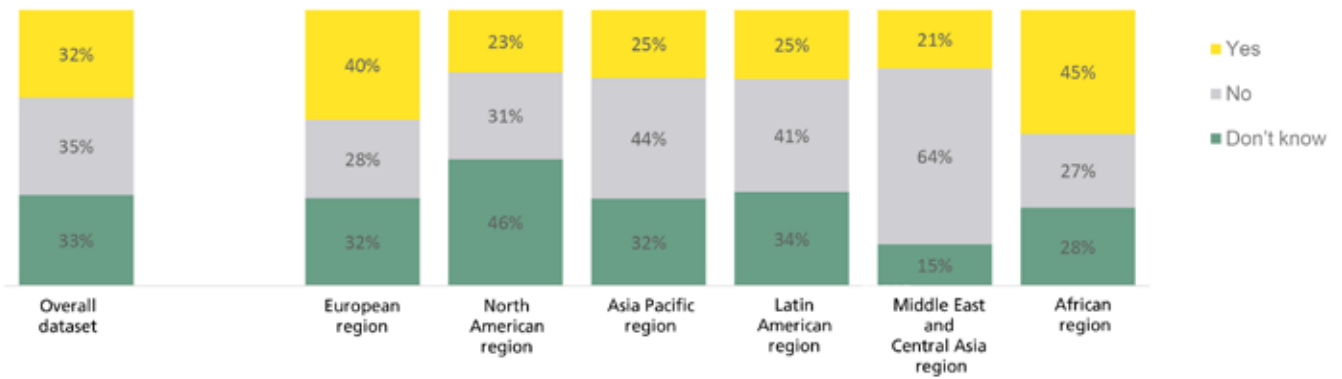
However, the existence of anti-corruption policies alone does not appear to regionally correlate with the prevalence of corruption.



A third of respondents reported that international corruption was addressed in Bar Association or Law Society guidelines in their home jurisdictions. North American respondents showed less awareness of whether this was the case.

9 See p 23 of the 2010 survey report.

Do the Bar Association or Law Society guidelines in your jurisdiction address specifically the issue of international corruption, e.g., foreign bribery?

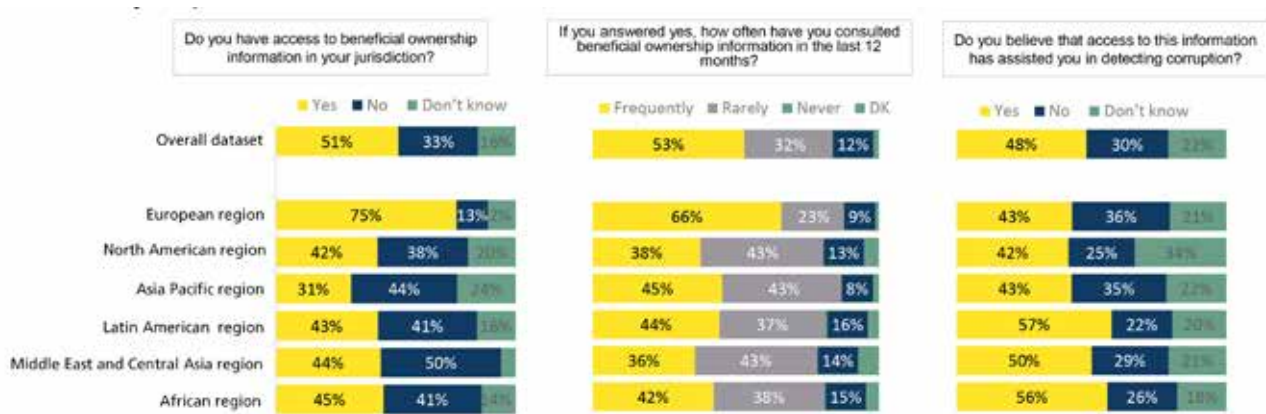


### Beneficial ownership information

Beneficial ownership information was most available to respondents in Europe and appears to be consulted by them frequently. However, European respondents also appeared more sceptical as to whether such information has been helpful in detecting corruption.

Otherwise, well under half of respondents in other regions claimed to have access to beneficial ownership information, dropping to less than a third of respondents in the Asia Pacific region.

Respondents from Africa and Latin America were more likely to see such information as a useful tool for detecting corruption than their European counterparts.



On balance, the survey results indicate that where there is access to beneficial ownership information, a jurisdiction’s corruption risk profile tends to be lower (Latin America was the exception, although the overall risk profile was generally high for this jurisdiction).

## What next?

As the survey results demonstrate, promising headway has been made globally in terms of lawyers' understanding of the extraterritorial impact of international anti-corruption instruments and clients' understanding of anti-corruption due diligence practices.

The survey also demonstrates the positive impact of safeguarding tools on lowering the corruption risk profile of jurisdictions, and in particular, the impact of beneficial ownership information and anti-money laundering training being made available to lawyers.

However, the results also indicate that corruption remains a prevalent, and in many cases growing, issue particularly in certain regions and practice areas.

Law firms, organisations, practitioners, bar associations and law societies are therefore encouraged to continue to revisit and renew their anti-corruption policies and training for lawyers to reflect the constantly changing global legal environment.

Furthermore, practitioners are encouraged to familiarise themselves with their national anti-corruption legislation and regulations, and to make an effort to improve their understanding of the impact of international anti-corruption instruments and extraterritorial legislation on their work.

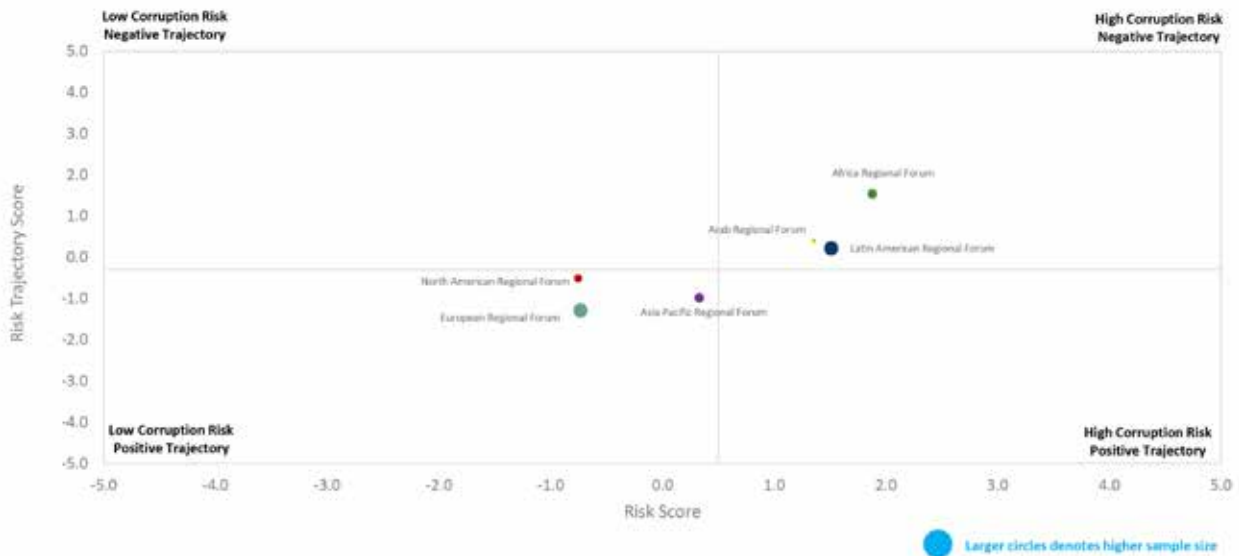
The IBA continues to undertake anti-corruption initiatives for the global legal profession. In addition to the 2024 survey, these efforts include updating the IBA's *Anti-Corruption Guidance for Bar Associations* and commencing associated anti-corruption and anti-money laundering capacity building initiatives for bars, in partnership with the International Federation of Accountants and Financial Action Task Force.

The IBA Anti-Corruption Committee and LPRU will continue to engage with stakeholders on this work, including broadening collaboration with other IBA Committees as appropriate.

# Annex 1: Risk trajectory profiles – Practice areas and region-specific results

## Global risk trajectory profiles

### Regions



### Risk trajectory profiles by country<sup>10</sup>



<sup>10</sup> Countries with fewer than five survey responses are not included.

## Risk trajectory profiles by practice area

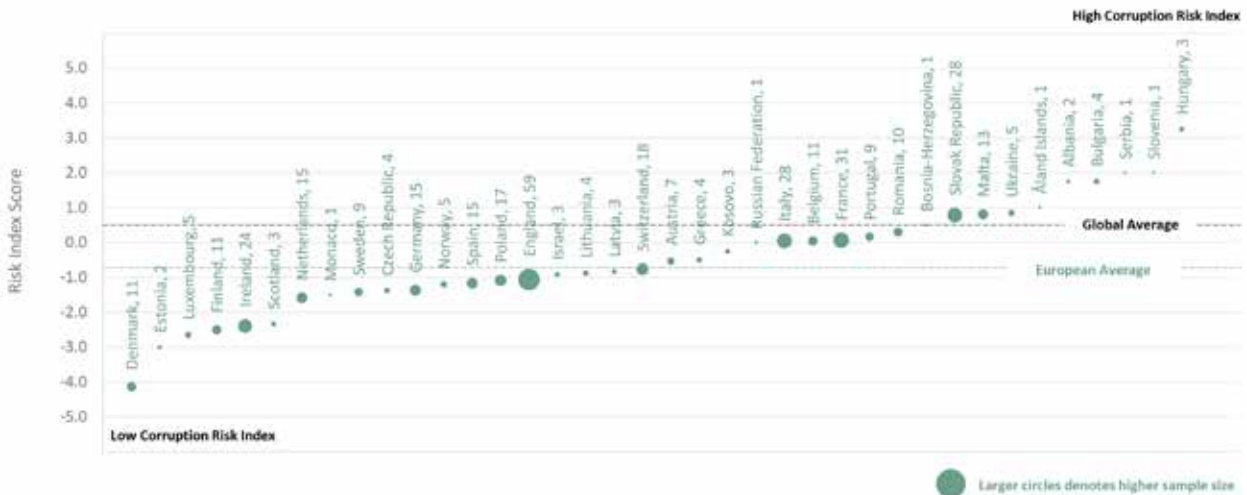


## Region-specific risk trajectory profiles

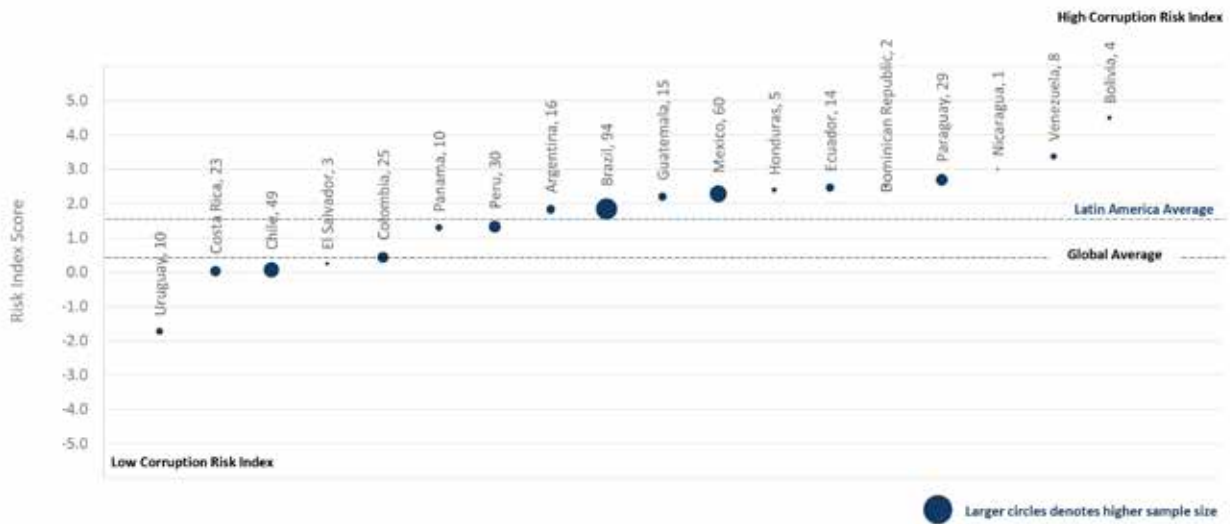
### European Region

## European Regional Forum Risk Index

Total base = 387



## Latin America Region



## Asia Pacific Region

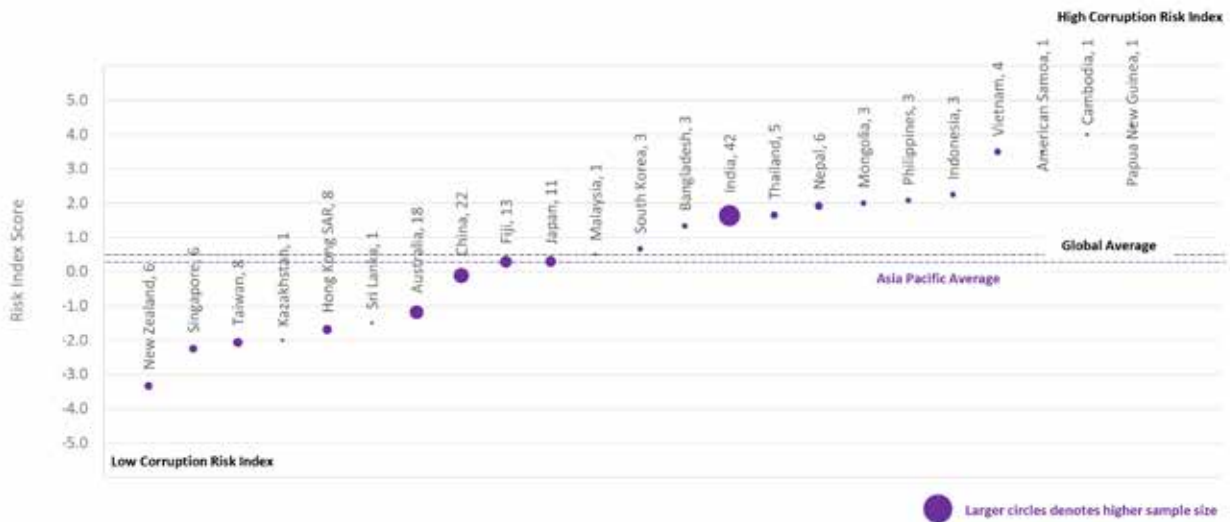
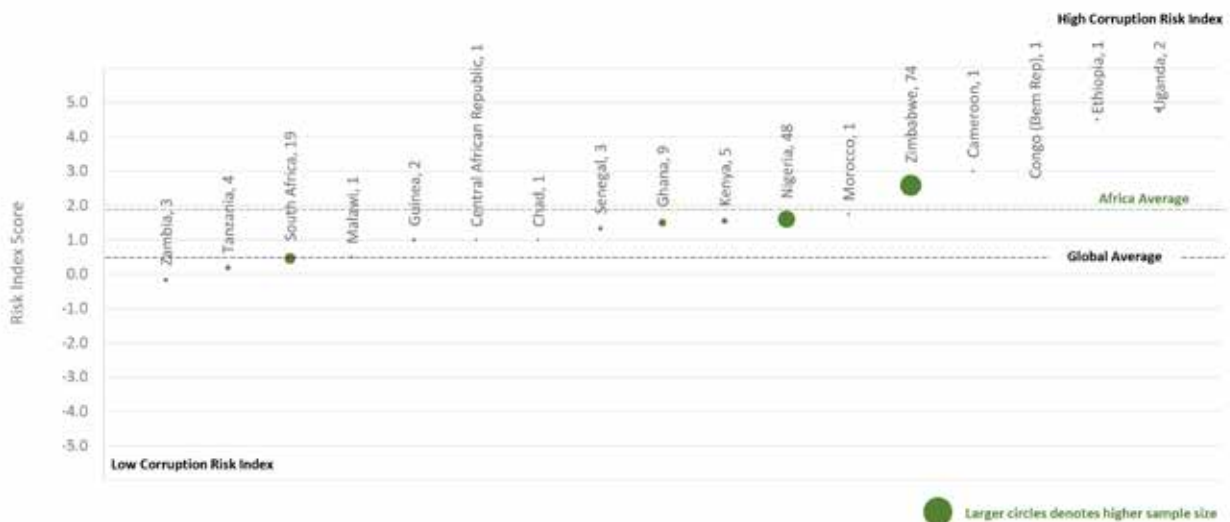
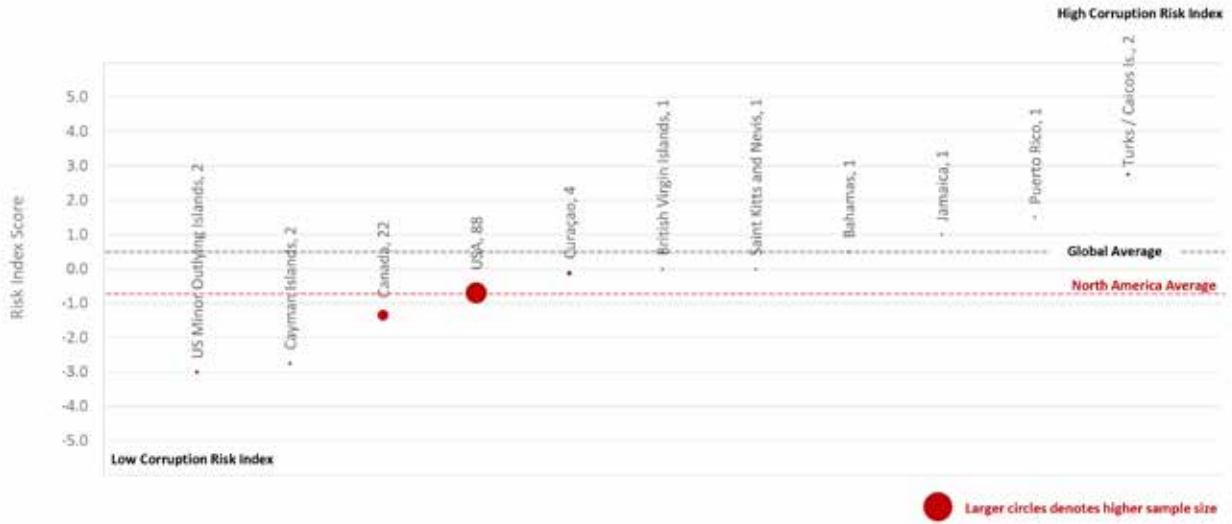


Figure 27: Asia Pacific Regional Forum risk index

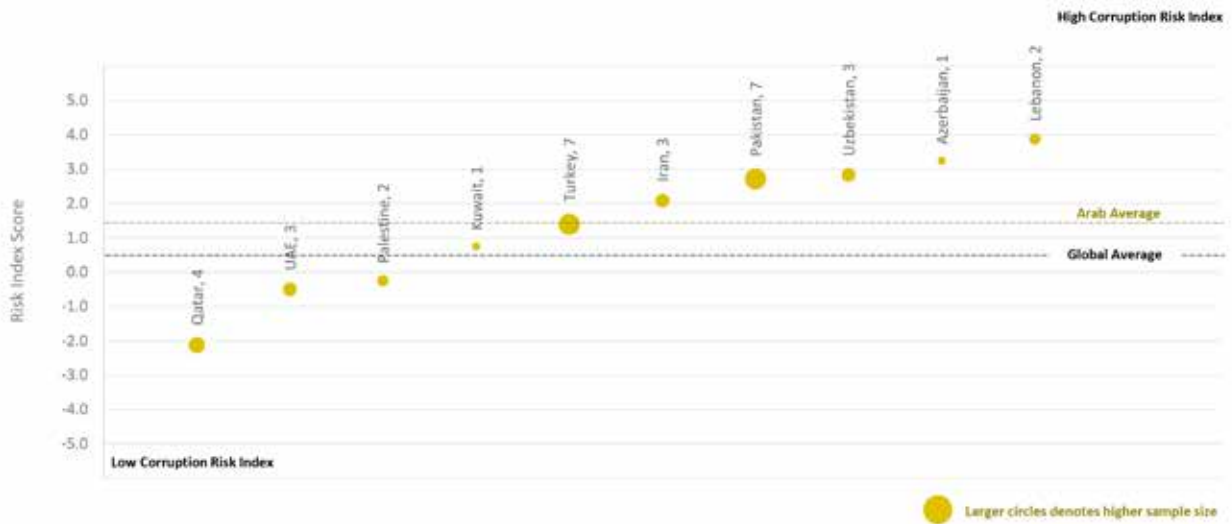
## Africa Region



## North America Region



## Middle East and Central Asian Region



## Annex 2: Survey questions

### ABOUT YOU

(s1) Are you currently a practising lawyer?

- Yes  No (screen out)

(s2) Which one of the following are you primarily working for?

- Private practice/law firm  In-house/business  
 Judiciary  Government/public sector

Other \_\_\_\_\_

(s3) In order to practice in your chosen jurisdiction, are you required to be a member of a professional body (ie, bar association or law society)?

- Yes – [name] \_\_\_\_\_  
 No

(s4) What is your position within your organisation?

Law firm:

- Partner  Associate  
 Of counsel/special counsel  Professional support lawyer  Advocate/solicitor advocate  
 Trainee  Other [please specify] \_\_\_\_\_

In-house/business/government/public sector:

- General counsel  Deputy/assistant general counsel  In-house legal  
 Legal advisor/legal officer  Other [please specify] \_\_\_\_\_

Judiciary:

- Barrister  Advocate/solicitor advocate  Judge

[All] Other [please specify] \_\_\_\_\_

(s5) Please select your main area of practice.

- Aviation  Competition  Compliance/white collar  Corporate/commercial  
 Criminal  Dispute resolution  Employment  Energy & environment  
 Financial & investment  Human rights  Infrastructure & construction  
 Intellectual property  International trade  Maritime  
 Public law  International law  Real estate  
 Taxation  Other [please specify] \_\_\_\_\_

(s6) What is your age?

- 20-30  31-40  41-50  51-60  61 and over  Prefer not to state

(s7) Which gender do you identify with?

- Female  Male  Prefer to self-describe (open)  Prefer not to disclose

(s8) Please select the name of the jurisdiction in which you primarily practice. (Drop down box)



## PERCEPTIONS OF CORRUPTION AND FOREIGN BRIBERY

(8) To what extent, if any, is corruption a common issue faced by your profession (in the context of working with clients, judiciary, government officials or more broadly) in your jurisdiction?

- Never       Rarely       Quite common       Very common       Don't know

(9) Based on your professional experience, do you believe that – over the last ten years – the level of corruption in your jurisdiction has:

- Significantly increased       Somewhat increased       Remained about the same  
 Somewhat decreased       Significantly decreased       Don't know

(9a) Compared to ten years ago, do you think your national anti-corruption laws and regulations have improved the following issues?

Please select all that apply:

- Local investors bribing foreign officials in foreign jurisdictions.  
 Foreign investors bribing local officials in your jurisdiction.  
 They are not improving either of the above [exclusive]  
 I was not practising ten years ago [exclusive]

(10) Is corruption – including demands for the payment of bribes, a material business issue for your clients?

- No       A small minority of clients       A significant minority of clients  
 A majority of clients       Almost all/all clients       Don't know

(10a) On average, how often would you provide advice on issues involving international corruption, eg, foreign bribery, to companies in your jurisdiction or individuals from your jurisdiction doing business abroad?

- Never       Rarely       Often       Very often       Don't know

## EXPERIENCING AND REPORTING CORRUPTION

(11) Have you ever been asked to be involved and/or acted in a transaction that could reasonably be suspected to involve corruption or the proceeds of corruption?

- Yes       No       Don't know

(11a) If you answered yes, how did you respond (please use your most recent experience)?

- Refused to act and reported to authorities  
 Refused to act but did not report to authorities  
 Continued after further diligence  
 Continued without further diligence

Other \_\_\_\_\_

(12) Do you believe that you have lost business to other law firms or individual lawyers who are prepared to make illicit payments to government officers on behalf or for the benefit of foreign companies/investors? Select all that apply.

- Yes – within the last year       Yes – over a year ago but within five years       Yes – more than five years ago  
 No       Don't know

(13) Have you ever experienced corruption risk in a jurisdiction outside the principal place you practice? Select all that apply.

- Yes – within the last year       Yes – over a year ago but within five years       Yes – more than five years ago  
 No       Don't know

**(13a) If comfortable, please describe the nature of the corruption risk (eg, direct solicitation, indirect solicitation via third party, others)**

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**(14) Has a client ever asked you to include on your invoice a consultant or agent, including local counsel?**  
 Yes       No       Don't know

**(14a) If you answered yes, how did you act upon this request (please use the most recent example)?**

- I accepted without further due diligence checks       I accepted based on the due diligence of the client  
 I accepted based on my own due diligence       I refused

**(15) Have you ever conducted corruption risk diligence of a law firm when retaining local counsel in a jurisdiction different than the place you practice? Select all that apply.**

- Yes – within the last year       Yes – over a year ago but within five years       Yes – more than five years ago  
 No       Don't know

**(16) Does your firm/organisation have a clear and specific anti-corruption policy?**

- Yes       No       Don't know

**(16a) If you answered yes, is the policy publicly available and easily accessible?**

- Yes       No       Don't know

**(16b) If you answered yes to question 16, how does your firm/organisation implement this policy? Select all that apply**

- Code of ethics       Staff training       Corporate Social Responsibility Statement  
 Designated Anti-Corruption Compliance Officer       Personal responsibility

Other \_\_\_\_\_

**(17) Have you ever been required by a client to certify compliance with anti-corruption laws? Select all that apply.**

- Yes – within the last year       Yes – over a year ago but within five years       Yes – more than five years ago  
 No       Don't know

**(18) If you answered yes to question 16, have you ever been required by a client to produce the firm/organisation anti-corruption policy?**

- Yes – within the last year       Yes – over a year ago but within five years       Yes – more than five years ago  
 No       Don't know

**(19) From your experience, please rate the likelihood of a typical professional in your line of work/jurisdiction reporting corruption (to the relevant law enforcement agency/government authority) when they become aware of it:**

- Highly likely       Somewhat likely       Neither likely nor unlikely       Somewhat unlikely  
 Highly unlikely       Don't know

## COMBATTING CORRUPTION

(20) Have you ever received any formal training related to compliance with anti-corruption and/or anti-money laundering requirements in your jurisdiction?

Anti-corruption:

Yes  No  Don't know

Anti-money laundering:

Yes  No  Don't know

(20a) If such training has been received, was it provided for by your: Select all that apply

Bar  Law Society  Regulator  Law firm  
 Organisation (eg, corporate employer, government department)  
 None of the above  Don't know

(21) Do the Bar Association or Law Society guidelines in your jurisdiction address specifically the issue of international corruption, (eg, foreign bribery)?

Yes  No  Don't know

(22) Are you aware of the extraterritorial impact of relevant anti-corruption/Anti-Money Laundering laws from outside your own jurisdiction, ie, the US Foreign Corrupt Practices Act, the UK Bribery Act, and EU legislation?

Yes  No

(23) In your experience what are the main corruption risks in a cross-border operation? Please select all that apply:

Interaction with public officials  Using a local partner  Using an agent/intermediary  
 Small facilitation payments  Gifts and hospitality  A weak legal framework  
 No personal experience of cross-border operations [exclusive]

Other \_\_\_\_\_

(24) Do you have access to beneficial ownership information in your jurisdiction?

Yes  No  Don't know

(24a) If you answered yes, how often have you consulted beneficial ownership information in the last 12 months?

Frequently  Rarely  Never  Don't know

(24b) Do you believe that access to this information has assisted you in detecting corruption?

Yes  No  Don't know

(25) Compared to five years ago, do you believe that the current compliance requirements that you must follow in your professional capacity, have reduced corruption and money laundering in your jurisdiction?

Yes  No  Don't know

(26) Compared to ten years ago, in your opinion, are the law and regulations related to preventing, detecting and prosecuting corruption in your jurisdiction more, or less effective?

Significantly more effective  Somewhat more effective  About the same  
 Somewhat less effective  Significantly less effective  Don't know



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