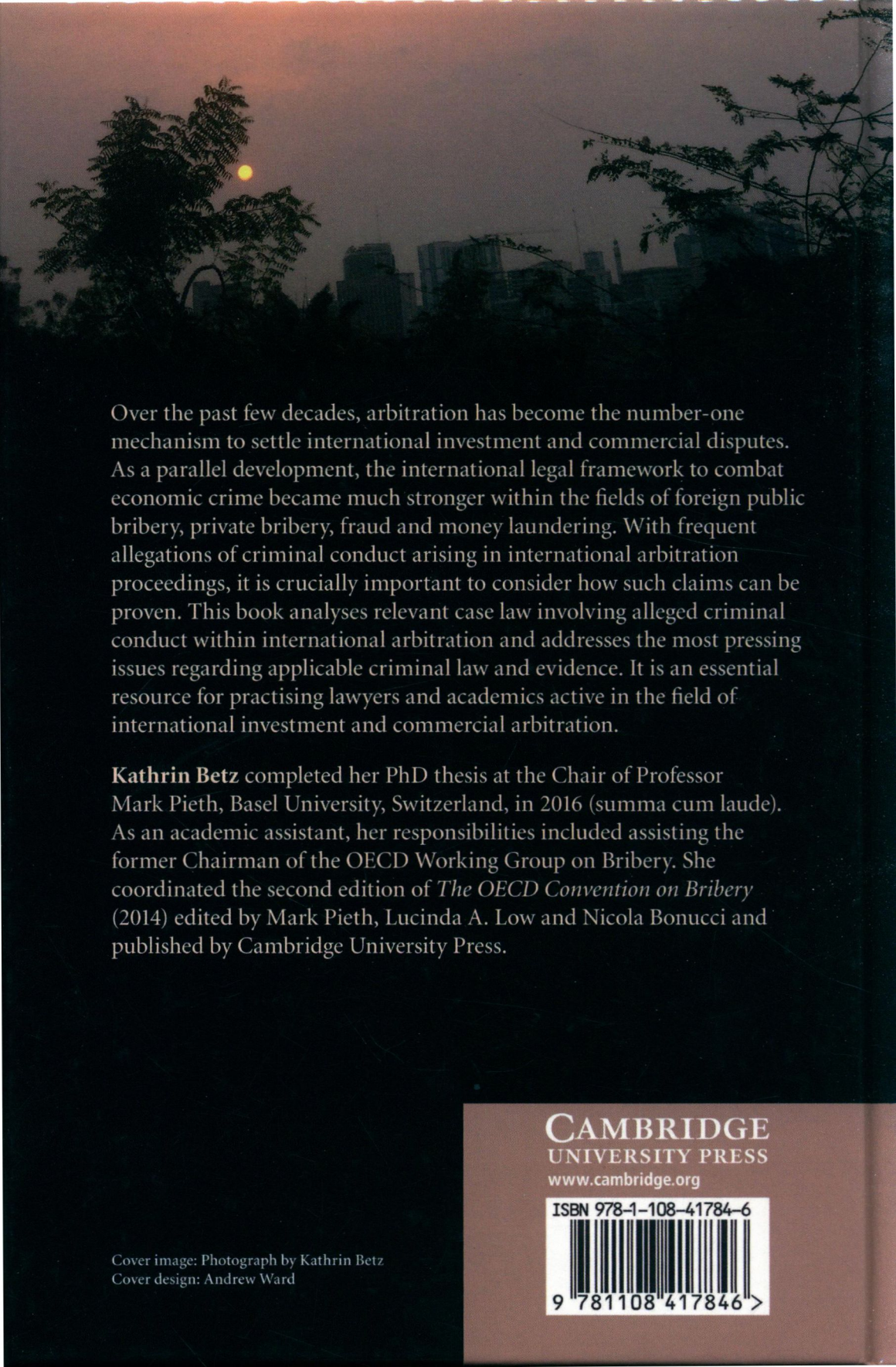
The background of the book cover is a photograph of a sunset or sunrise. The sky is a mix of orange, yellow, and blue, with scattered white clouds. In the foreground, there are dark silhouettes of palm trees and other tropical foliage. At the bottom, a city skyline is visible through the trees.

Proving Bribery, Fraud and Money Laundering in International Arbitration

On Applicable Criminal Law and Evidence

Kathrin Betz

CAMBRIDGE



Over the past few decades, arbitration has become the number-one mechanism to settle international investment and commercial disputes. As a parallel development, the international legal framework to combat economic crime became much stronger within the fields of foreign public bribery, private bribery, fraud and money laundering. With frequent allegations of criminal conduct arising in international arbitration proceedings, it is crucially important to consider how such claims can be proven. This book analyses relevant case law involving alleged criminal conduct within international arbitration and addresses the most pressing issues regarding applicable criminal law and evidence. It is an essential resource for practising lawyers and academics active in the field of international investment and commercial arbitration.

Kathrin Betz completed her PhD thesis at the Chair of Professor Mark Pieth, Basel University, Switzerland, in 2016 (*summa cum laude*). As an academic assistant, her responsibilities included assisting the former Chairman of the OECD Working Group on Bribery. She coordinated the second edition of *The OECD Convention on Bribery* (2014) edited by Mark Pieth, Lucinda A. Low and Nicola Bonucci and published by Cambridge University Press.

Cover image: Photograph by Kathrin Betz
Cover design: Andrew Ward

CAMBRIDGE
UNIVERSITY PRESS
www.cambridge.org

ISBN 978-1-108-41784-6



Betz
Proving Bribery, Fraud and Money
Laundering in International Arbitration

CAMBRIDGE

PROVING BRIBERY, FRAUD AND MONEY LAUNDERING IN INTERNATIONAL ARBITRATION

On Applicable Criminal Law and Evidence

KATHRIN BETZ

University of Basel



CAMBRIDGE
UNIVERSITY PRESS

CAMBRIDGE
UNIVERSITY PRESS

University Printing House, Cambridge CB2 8BS, United Kingdom

One Liberty Plaza, 20th Floor, New York, NY 10006, USA

477 Williamstown Road, Port Melbourne, VIC 3207, Australia

314-321, 3rd Floor, Plot 3, Splendor Forum, Jasola District Centre, New Delhi-110025, India

79 Anson Road, #06-04/06, Singapore 079906

Cambridge University Press is part of the University of Cambridge.

It furthers the University's mission by disseminating knowledge in the pursuit of education, learning and research at the highest international levels of excellence.

www.cambridge.org

Information on this title: www.cambridge.org/9781108417846

DOI: 10.1017/9781108279260

© Kathrin Betz 2017

This publication is in copyright. Subject to statutory exception and to the provisions of relevant collective licensing agreements, no reproduction of any part may take place without the written permission of Cambridge University Press.

First published 2017

A catalogue record for this publication is available from the British Library

Library of Congress Cataloging in Publication data

Names: Betz, Kathrin, 1982– author.

Title: Proving bribery, fraud, and money laundering in international arbitration : on applicable criminal law and evidence / Kathrin Betz, University of Basel.

Description: Cambridge [UK] ; New York : Cambridge University Press, 2017. |

Includes bibliographical references and index.

Identifiers: LCCN 2017019175 | ISBN 9781108417846 (hardback : alk. paper)

Subjects: LCSH: Arbitration and award. | International commercial arbitration—Corrupt practices. | Bribery. | Fraud. | Money laundering. | Investments, Foreign (International law) | Criminal law. | Evidence, Criminal.

Classification: LCC K2400 .B53 2017 | DDC 345/.0263—dc23 LC record available at <https://lcn.loc.gov/2017019175>

ISBN 978-1-108-41784-6 Hardback

Cambridge University Press has no responsibility for the persistence or accuracy of URLs for external or third-party internet websites referred to in this publication, and does not guarantee that any content on such websites is, or will remain, accurate or appropriate.



PROVING BRIBERY, FRAUD AND MONEY LAUNDERING IN INTERNATIONAL ARBITRATION

Over the past few decades, arbitration has become the number-one mechanism to settle international investment and commercial disputes. As a parallel development, the international legal framework to combat economic crime became much stronger within the fields of foreign public bribery, private bribery, fraud and money laundering. With frequent allegations of criminal conduct arising in international arbitration proceedings, it is crucially important to consider how such claims can be proven. This book analyses relevant case law involving alleged criminal conduct within international arbitration and addresses the most pressing issues regarding applicable criminal law and evidence. It is an essential resource for practising lawyers and academics active in the field of international investment and commercial arbitration.

KATHRIN BETZ completed her PhD thesis at the Chair of Professor Mark Pieth, Basel University, Switzerland, in 2016 (*summa cum laude*). As an academic assistant, her responsibilities included assisting the former Chairman of the OECD Working Group on Bribery. She coordinated the second edition of *The OECD Convention on Bribery* (2014) edited by Mark Pieth, Lucinda A. Low and Nicola Bonucci and published by Cambridge University Press.

ACKNOWLEDGEMENTS

My sincere thanks are due to Prof. Mark Pieth for supervising the PhD project on which this book is based. Working at his Chair at Basel University allowed me to dig deeply into a number of international arbitration cases, and exchanging views with him has been a constant source of motivation. I have learned a lot from him. Prof. Krista Nadakavukaren Schefer, my second supervisor, continuously supported the project and engaged in fruitful discussions, and Dr. Stephan Wilske was ready to act as an expert in the doctoral colloquium.

Professors Sabine Gless, Lukas Handschin, Anton K. Schnyder and Ingeborg Zerbès shared their perspectives on several aspects, for which I am most grateful. Kirstin Bentley proofed the final manuscript. The International Chamber of Commerce Institute of World Business Law generously gave me the opportunity to participate in their Annual Meeting on 'Addressing Issues of Corruption in Commercial and Investment Arbitration', allowing an insight into where things stand.

Last but not least, I would like to thank Kim Hughes and Rebecca Roberts of Cambridge University Press for their essential support.

TABLE OF ARBITRAL AWARDS

International Centre for Settlement of Investment Disputes (ICSID)

- African Holding v. Democratic Republic of Congo*, ICSID Case No. ARB/05/21, *African Holding Company of America, Inc. et Société Africaine de Construction au Congo SARL et La République Démocratique du Congo*, Sentence sur les déclinatoires de compétence et la recevabilité, 29 July 2008
- Azpetrol v. Azerbaijan*, ICSID Case No. ARB/06/15, *Azpetrol International Holdings B.V. et al. and The Republic of Azerbaijan*, Award, 8 September 2009
- Bayindir v. Pakistan*, ICSID Case No. ARB/03/29, *Bayindir Insaat Turizm Ticaret ve Sanayi A.Ş. v. Islamic Republic of Pakistan*, Award, 27 August 2009
- Biwater Gauff v. Tanzania*, ICSID Case No. ARB/05/22, *Biwater Gauff (Tanzania) Ltd. v. United Republic of Tanzania*, Award, 24 July 2008
- David Minnotte and Robert Lewis v. Poland*, ICSID Case No. ARB(AF)/10/1, *David Minnotte and Robert Lewis and Republic of Poland*, Award, 16 May 2014
- EDF v. Romania*, ICSID Case No. ARB/05/13, *EDF (Services) Limited and Romania*, Award, 8 October 2009
- Enron v. Argentina*, ICSID Case No. ARB/01/3, *Enron Corporation and Ponderosa Assets, L.P. v. The Argentine Republic*, Decision on Jurisdiction, 14 January 2004
- Fraport v. Philippines I*, ICSID Case No. ARB/03/25, *Fraport AG Frankfurt Airport Services Worldwide and The Republic of the Philippines*, Award, 16 August 2007
- Fraport v. Philippines II*, ICSID Case No. ARB/11/12, *Fraport AG Frankfurt Airport Services Worldwide and Republic of the Philippines*, Award, 10 December 2014
- Getma v. Guinea*, ICSID Case No. ARB/11/29, *Getma International, NCT Necotrans, Getma International Investissements, NCT Infrastructure & Logistique et La République de Guinée*, Sentence, 16 August 2016
- Grynberg et al. v. Grenada*, ICSID Case No. ARB/10/6, *Rachel S. Grynberg, Stephen M. Grynberg, Miriam Z. Grynberg, and RSM Production Corporation v. Grenada*, Award, 10 December 2010
- Hamester v. Ghana*, ICSID Case No. ARB/07/24, *Gustav F W Hamester GmbH & Co KG v. Republic of Ghana*, Award, 18 June 2010
- Inceysa v. El Salvador*, ICSID Case No. ARB/03/26, *Inceysa Vallisoletana, S.L. v. Republic of El Salvador*, Award, 2 August 2006

- Libananco v. Turkey*, ICSID Case No. ARB/06/8, *Libananco Holdings Co. Limited and Republic of Turkey*, Award, 2 September 2011
- Metal-Tech v. Uzbekistan*, ICSID Case No. ARB/10/3, *Metal-Tech Ltd. v. The Republic of Uzbekistan*, Award, 4 October 2013
- Niko v. Bangladesh*, ICSID Cases No. ARB/10/11 and ARB/10/18, *Niko Resources (Bangladesh) Ltd. and People's Republic of Bangladesh, Bangladesh Petroleum Exploration & Production Company Limited ('Bapex') and Bangladesh Oil Gas and Mineral Corporation ('Petrobangla')*, Decision on Jurisdiction, 19 August 2013
- Phoenix v. Czech Republic*, ICSID Case No. ARB/06/5, *Phoenix Action, Ltd. v. Czech Republic*, Award, 15 April 2009
- Plama v. Bulgaria*, ICSID Case No. ARB/03/24, *Plama Consortium Limited and Republic of Bulgaria*, Award, 27 August 2008
- Quiborax v. Bolivia*, ICSID Case No. ARB/06/2, *Quiborax S.A., Non Metallic Minerals S.A. and Allan Fosk Kaplún v. Plurinational State of Bolivia*, Decision on Provisional Measures, 26 February 2010
- Rompetrol v. Romania*, ICSID Case No. ARB/06/3, *The Rompetrol Group N.V. and Romania*, Award, 6 May 2013
- RSM v. Grenada*, ICSID Case No. ARB/05/14, *RSM Production Corporation and Grenada*, Award, 13 March 2009
- RSM v. Grenada*, Annulment Proceeding, ICSID Case No. ARB/05/14, *RSM Production Corporation and Grenada*, Decision on RSM Production Corporation's Application for a Preliminary Ruling of 29 October 2009, 7 December 2009
- Saba Fakes v. Turkey*, ICSID Case No. ARB/07/20, *Mr. Saba Fakes and Republic of Turkey*, Award, 14 July 2010
- Salini v. Morocco*, ICSID Case No. ARB/00/4, *Salini Costruttori S.P.A. and Italstrade S.P.A. v. Kingdom of Morocco*, Decision on Jurisdiction, 16 July 2001
- Siag v. Egypt*, ICSID Case No. ARB/05/15, *Waguih Elie George Siag and Clorinda Vecchi and The Arab Republic of Egypt*, Award, 1 June 2009
- Siemens v. Argentina*, ICSID Case No. ARB/02/8, *Siemens AG and The Argentine Republic*, Award, 6 February 2007
- Sistem v. Kyrgyz Republic*, ICSID Case No. ARB(AF)/06/1, *Sistem Mühendislik İnşaat Sanayi ve Ticaret A.Ş. and Kyrgyz Republic*, Award, 9 September 2009
- Spentex v. Uzbekistan*, ICSID Case No. ARB/13/26, *Spentex Netherlands B.V. and Republic of Uzbekistan*, Award, 27 December 2016
- Tokios Tokelès v. Ukraine*, ICSID Case No. ARB/02/18, Award, 26 July 2007
- Tokios Tokelès v. Ukraine*, ICSID Case No. ARB/02/18, Decision on Jurisdiction, 29 April 2004
- TSA Spectrum v. Argentina*, ICSID Case No. ARB/05/5, *TSA Spectrum de Argentina S.A. v. Argentine Republic*, Award, 19 December 2008
- Wena v. Egypt*, ICSID Case No. ARB/98/4, *Wena Hotels Limited v. Arab Republic of Egypt*, Award, 8 December 2000

World Duty Free v. Kenya, ICSID Case No. ARB/00/7, *World Duty Free Company Limited and The Republic of Kenya*, Award, 4 October 2006

Permanent Court of Arbitration (PCA)

Guyana v. Suriname, Award, 17 September 2007

Hulley Enterprises v. Russia, *Hulley Enterprises Limited (Cyprus) and The Russian Federation*, PCA Case No. AA 226, Final Award, 18 July 2014

Veteran Petroleum Limited v. Russia, *Veteran Petroleum Limited (Cyprus) and The Russian Federation*, PCA Case No. AA 228, Final Award, 18 July 2014

Yukos Universal Limited v. Russia, *Yukos Universal Limited (Isle of Man) and The Russian Federation*, PCA Case No. AA 227, Final Award, 18 July 2014

Agreement on Promotion, Protection and Guarantee of Investments among Member States of the Organisation of the Islamic Conference (OIC), Article 17

Al-Warraq v. Indonesia, *Hesham Talaat M. Al-Warraq v. The Republic of Indonesia*, Final Award, 15 December 2014

North American Free Trade Agreement (NAFTA), Chapter 11

Methanex v. United States, *Methanex Corporation and United States of America*, Final Award of the Tribunal on Jurisdiction and Merits, 3 August 2005

International Chamber of Commerce (ICC)

ICC Case No. 1110, Award; 10 *Arbitration International* (1994), 282

ICC Case No. 3344; 109 *Journal du droit international* (1982), 978

ICC Case No. 3913; summary published in Crivellaro 2003, 120

ICC Case No. 3916, Award; 111 *Journal du droit international* (1984), 930

ICC Case No. 4145, Interim Awards and Final Award of 1983, 1984 and 1986;

Yearbook Commercial Arbitration XII (1987), 97 [cit. ICC Case No. 4145,

Yearbook]; 112 *Journal du droit international* (1985), 985 [cit. ICC Case No. 4145, *Journal*]

ICC Case No. 5943, 123 *Journal du droit international* (1996), 1014

ICC Case No. 6248, Final Award, *Yearbook Commercial Arbitration* XIX (1994), 124

ICC Case No. 6320, Final Award, *Yearbook Commercial Arbitration* XX (1995), 62

ICC Case No. 6497, Final Award; *Yearbook Commercial Arbitration* XXIV (1999), 71

ICC Case No. 8891, Award; 127 *Journal du droit international* (2000), 1076

ICC Case No. 9333, Final Award; *Collection of ICC Arbitral Awards 2001–2007* (2009),

575 [cit. ICC Case No. 9333, *Collection*]; *ASA Bulletin* (2001), 757 [cit. ICC Case

No. 9333, *ASA Bulletin*]; *ICC International Court of Arbitration Bulletin* (1999), 102

[cit. ICC Case No. 9333, *ICC Bulletin*]

- ICC Case No. 11307, Final Award, *Yearbook Commercial Arbitration* XXXIII (2008), 24
- ICC Case No. 12472, Final Award; 24 *ICC International Court of Arbitration Bulletin* (2013), Special Supplement, 'Tackling Corruption in Arbitration', 46
- ICC Case No. 12732, Partial Award; 22 *ICC International Court of Arbitration Bulletin* (2011), 76
- ICC Case No. 12990, Final Award; 24 *ICC International Court of Arbitration Bulletin* (2013), Special Supplement, 'Tackling Corruption in Arbitration', 52 [cit. ICC Case No. 12990, Bulletin]; also published (incorrectly numbered as ICC Case No. 12290) in *Collection of ICC Arbitral Awards 2008–2011* (2013), 831 [cit. ICC Case No. 12990, Collection]; 137 *Journal du droit international* (2010), 1406 [cit. ICC Case No. 12990, Journal]
- ICC Case No. 13384, Final Award; 24 *ICC International Court of Arbitration Bulletin* (2013), Special Supplement, 'Tackling Corruption in Arbitration', 62
- ICC Case No. 13515, Final Award; 24 *ICC International Court of Arbitration Bulletin* (2013), Special Supplement, 'Tackling Corruption in Arbitration', 66
- ICC Case No. 13914, Final Award; 24 *ICC International Court of Arbitration Bulletin* (2013), Special Supplement, 'Tackling Corruption in Arbitration', 77
- ICC Case No. 14470, Final Award; 24 *ICC International Court of Arbitration Bulletin* (2013), Special Supplement, 'Tackling Corruption in Arbitration', 90
- ICC Case No. 14878, Final Award; 24 *ICC International Court of Arbitration Bulletin* (2013), Special Supplement, 'Tackling Corruption in Arbitration', 92
- ICC Case No. 16090, Final Award, *ICC Dispute Resolution Bulletin* (2016), Issue 1, 147
- Hilmarton v. OTV*, ICC Case No. 5622, *Hilmarton Ltd. v. Omnium de Traitement et de Valorisation (OTV)*, Award of 19 August 1988; *Yearbook Commercial Arbitration* XIX (1994), 105 [cit. *Hilmarton v. OTV*, Yearbook]; *ASA Bulletin* (1993), 247
- PIATCO v. Republic of the Philippines*, ICC Case No. 12610/TE/MW/AVH/JEM/MLK, *Philippine International Air Terminals Co., Inc. v. The Government of the Republic of the Philippines*, Partial Award of 22 July 2010 (unpublished)
- Westacre v. Jugimport*, ICC Case No. 7047, Final Award of 28 February 1994; *ASA Bulletin* (1995), 301 [cit. *Westacre v. Jugimport*, Bulletin]; *Yearbook Commercial Arbitration* XXI (1996), 79 [cit. *Westacre v. Jugimport*, Yearbook]
- Westinghouse v. National Power Corporation*, ICC Case No. 6401, *Westinghouse International Projects Company et al. v. National Power Corporation and the Republic of the Philippines*, Preliminary Award of 19 December 1991; 7(1) *Mealey's International Arbitration Report* (1992), B-1
- X v. Y (2004 Geneva Award), ICC Case No. 12875/MS, Award of 16 August 2004 (unpublished)

Tribunal Arbitral du Sport/Court of Arbitration for Sport (TAS/CAS)

- Adamu v. FIFA, Amos Adamu and Fédération Internationale de Football Association*, CAS 2011/A/2426, Award, 24 February 2012

Ad Hoc Arbitral Awards

Oostergetel v. Slovak Republic, UNCITRAL ad hoc Arbitration, *Jan Oostergetel and Theodora Laurentius and The Slovak Republic*, Final Award, 23 April 2012

X v. Y (2004 Zurich Award), *ad hoc* arbitration, Partial Award of 19 October 2004, Zurich (unpublished)

X v. Y (2006 Zurich Award), *ad hoc* arbitration, Second Partial Award of 16 May 2006, Zurich (unpublished)

TABLE OF COURT CASES

France

Appeals Courts (Cour d'appel)

- Paris Appeals Court, decision of 19 December 1991 (on *Hilmarton v. OTV*); *Rivista dell'arbitrato* (1992), 743
- Société Labinal v. Sociétés Mors et Westland Aerospace*, Paris Appeals Court, decision of 19 May 1993; *Revue de l'arbitrage* (1993), 645
- Paris Appeals Court, decision 13/13278 of 17 February 2015 (on *Crédit Lyonnais and Bernard Tapie*)
- Paris Appeals Court, decision 15/01650 of 21 February 2017 (on *Valeri Belokon v. Kyrgyz Republic*)
- Versailles Appeals Court (on *Hilmarton v. OTV*); *Yearbook Commercial Arbitration* XXI (1996), 524

Supreme Court (Cour de Cassation)

- Supreme Court (on *Hilmarton v. OTV*); *Yearbook Commercial Arbitration* XX (1995), 663
- Supreme Court (on *Hilmarton v. OTV*); *Yearbook Commercial Arbitration* XXII (1997), 696

Switzerland

Cantonal Courts

- Court of Justice of the Canton of Geneva, *Hilmarton v. OTV*; *Rivista dell'arbitrato* (1992), 735; *ASA Bulletin* (1993), 250

Swiss Federal Supreme Court (Bundesgericht)

- BGE 76 II 33
- BGE 95 II 37
- BGE 118 II 199
- BGE 118 II 353
- BGE 118 IV 175

BGE 119 II 380 (on *Westinghouse v. National Power Corporation*)
 BGE 120 II 155
 BGE 126 III 249
 BGE 129 III 320
 BGE 131 I 272
 BGE 131 IV 36
 BGE 132 III 389
 BGE 133 III 139
 BGer of 17 April 1990 (on *Hilmarton v. OTV*); *Rivista dell'arbitrato* (1992), 739;
 ASA Bulletin (1993), 253
 BGer of 30 December 1994 (on *Westacre v. Jugoimport*); *ASA Bulletin* (1995), 217
 BGer of 28 January 1997 (on *Thomson CSF v. Frontier AG Bern et al.*); *ASA Bulletin*
 (1998), 118
 BGer 4P.260/2000 of 2 March 2001; *ASA Bulletin* (2001), 531
 BGer 4A_596/2008 of 6 October 2009 (on *Thales (formerly Thomson CSF) v. Frontier*
 AG Bern et al.); *ASA Bulletin* (2010), 318
 BGer 4A_488/2011 of 18 June 2012
 BGer 4A_538/2012 of 17 January 2013
 BGer 4A_362/2013 of 27 March 2014
 BGer 4A_448/2013 of 27 March 2014
 BGer 4A_178/2014 of 11 June 2014

United Kingdom

High Court of Justice, Chancery Division

In re Dellow's Will Trusts [1964] 1 WLR 451

High Court of Justice, Queen's Bench Division

Archbolds (Freightage) Ltd v. S Spangle Ltd [1961] 1 QBD 374
 Hire-Purchase Furnishings Co. v. Richens (1887) 20 QBD 387
 Westacre Investments Inc v. Jugoimport-SPDR Holding Co Ltd and Others [1998]
 4 All ER 570 (QBD)

England and Wales Court of Appeal, Civil Division

Abner Soleimany v. Sion Soleimany [1999] 3 All ER 847
 Hornal v. Neuberger Products Ltd [1957] 1 QB 247
 R(N) v. Mental Health Review Tribunal (Northern Region) [2006] QB 468
 Westacre Investments Inc v. Jugoimport-SPDR Holding Co Ltd and Others [1999]
 3 All ER 864

House of Lords

- Brown v. Rolls Royce Ltd [1960] 1 WLR 210
 In re B (Children)(Fc) [2008] UKHL 35
 In re H. and Others (Minors) [1996] AC 563
 R. v. Sang [1980] AC 402
 Secretary of State for the Home Department v. Rehman [2001] UKHL 47

United States*District Courts*

- RSM et al. v. Fridman et al., Civ. No. 1:06-cv-11512-EJW (S.D. New York), Judgment, 19 February 2009
The Republic of the Philippines and National Power Corporation v. Westinghouse Electric Corporation et al., Civ. No. 88-5150, Opinion of 4 February 1992 (D. New Jersey); 7(2) *Mealey's International Arbitration Report* (1992), A-1
 US v. Siemens AG Cr. No. 1:08-cr-367-RJL (D. Columbia), Statement of Offense, 15 December 2008
 US v. Siemens SA (Argentina), Cr. No. 1:08-cr-368-RJL (D. Columbia), Statement of Offense, 15 December 2008

Supreme Court

- Addington v. Texas, 441 US 418 (1979)
 Mitsubishi Motors Corp. v. Soler Chrysler-Plymouth, Inc., 473 US 614 (1985)
 Precision Instrument Mfg. Co. v. Automotive Co., 324 US 806 (1945)

European Court of Human Rights

- Condrón v. United Kingdom, European Court of Human Rights, Application no. 35718/97, Judgment, 2 May 2000
 John Murray v. United Kingdom, European Court of Human Rights, Application no. 18731/91, Judgment, 8 February 1996
 Saunders v. United Kingdom, European Court of Human Rights, Application no. 19187/91, Judgment, 17 December 1996

ABBREVIATIONS

AAA	American Arbitration Association
AC	Appeal Cases
AfDB	African Development Bank
All ER	All England Law Reports
AMLA	Swiss Anti-Money Laundering Act (Geldwäschereigesetz; GwG) (SR 955.0)
ASA	Association suisse de l'arbitrage (Swiss Arbitration Association)
BBl	Bundesblatt (Swiss Federal Gazette)
BGE	Bundesgerichtsentscheid (Swiss Federal Supreme Court decision, published)
BGer	Bundesgerichtsentscheid (Swiss Federal Supreme Court decision, unpublished)
BIT	bilateral investment treaty
CEO	Chief Executive Officer
CIETAC	China International Economic and Trade Arbitration Commission
CoE	Council of Europe
D.	District
DIAC	Dubai International Arbitration Centre
DIS	Deutsche Institution für Schiedsgerichtsbarkeit (German Institution of Arbitration)
DOJ	Department of Justice
EBRD	European Bank for Reconstruction and Development
ECHR	European Convention on Human Rights
EU	European Union
FATF	Financial Action Task Force
FCPA	Foreign Corrupt Practices Act (US)
HKCIAC	Hong Kong International Arbitration Centre
IADB	Inter-American Development Bank
IBA	International Bar Association
ICC	International Chamber of Commerce
ICDR	International Centre for Dispute Resolution (the International Division of the American Arbitration Association)