

## **Funk Publishes Flow Charts Deconstructing Australia's Brand-New Anti-Corruption Law & Brazil's Anti-Corruption "Clean Companies Act"**

**[Australia.](#)** Effective in March 2016, Australia strengthened its anti-bribery laws by adding the new books and records offence of intentionally or reckless false dealing with accounting documents. This first-of-its-kind flow chart deconstructs the flow and logic of this new law.

**[Brazil.](#)** As this flow chart illustrates, Brazil's Clean Company Act 2014 (Law No. 12,846) now holds companies responsible for the corrupt acts of their employees; it also introduces strict liability for those offences, meaning a company can be liable without a finding of fault. While the Act provides strict civil and administrative penalties, but no criminal penalties for companies, the Criminal Code establishes domestic criminal offences.

### **Authors**



### **T. Markus Funk Ph.D.**

Partner

[MFunk@perkinscoie.com](mailto:MFunk@perkinscoie.com) [303.291.2371](tel:303.291.2371)