

**RESPONSES TO THE CONSULTATION PAPER ON THE REVIEW OF THE
OECD ANTI-BRIBERY INSTRUMENTS**

Comment from Ugo Draetta (Professor of European and International Law, Università Cattolica del Sacro Cuore)

One comment I have is that the issue of bribes paid locally by subsidiaries (located in a country not part of the Convention) of companies located in Member States, ought to be addressed. There was a WGB paper on this subject (prepared by me) which may be ought to be revisited.