

OECD Working Group on Bribery

Public Summary Record

Plenary meeting
7-11 March 2022



Made up of representatives from the Parties to the Anti-Bribery Convention, the OECD Working Group on Bribery meets four times per year.

Country reports on implementation of the Anti-Bribery Convention and the 2009 Anti-Bribery Recommendation

The Working Group on Bribery (WGB):

- Adopted the [Phase 4 report of Greece](#), which was published on the website on 22 March 2022. The report welcomes the steps to improve detection but underlines the continued lack of investigation and prosecution of foreign bribery cases. Since the Convention entered into force in Greece over 24 years ago, there are still no convictions for foreign bribery. In late 2020, Greece merged the specialised Anti-Corruption Prosecutor's Office (PPACC) into the new Economic Crime Prosecutor's Office, and the WGB will follow closely its efforts in improving the investigation and prosecution of foreign bribery cases. Greece also needs to strengthen safeguards to protect foreign bribery proceedings being subjected to improper influence by concerns of a political nature. The report further expresses grave concerns that Greece does not have an effective legal framework for holding legal persons liable for foreign bribery or related offences, and recommends that Greece make wholesale reforms to its legal framework in this regard and also highlights the need to implement new legislation for whistleblowers. The report also shows that despite multiple reforms to the Criminal Code, some deficiencies in Greece's legislation on foreign bribery remain unaddressed since Phase 3bis. The report also highlights good practices that have the potential to enhance Greece's implementation of the Convention, including the establishment of the National Transparency Authority, to prevent, deter, detect and respond to fraud and corruption in public and private bodies. The WGB invited Greece to submit a written report in one year (i.e. March 2023) on issues concerning enforcement under the new Economic Crime Prosecutor, the liability of legal persons and whistleblower protection legislation. Also invited Greece to submit, within two years (i.e. March 2024), a written report on the implementation of all recommendations and on its efforts to implement the Convention.
- Considered [Costa Rica's Phase 2 two-year written follow-up report](#). Concluded that recommendations 2(b), 4(b)-(c), 5(b), 5(d), 6(a), 7(a)-(b), 9(a), 11(d), 11(f) and 14(d) had been fully implemented; recommendations 1(a)-(c), 2(a), 6(c)-(d), 10(d), 12(b), 13(a), 13(c), 14(c), and 16(f) had been partially implemented; and recommendations 3, 4(a), 5(a), 5(c), 6(b), 7(c)-(d), 8(a)-(c), 9(b), 10(a)-(c), 11(a)-(c), 11(e), 12(a), 12(c), 13(b), 13(d), 14(a)-(b), 15, and 16(a)-(e) had not been implemented. Invited Costa Rica to report back in writing within six months on the status of the Bill before the Legislative Assembly and recommendation 3.
- Heard a report from Japan on its efforts to implement four priority Phase 4 recommendations, including a presentation by Japan's Ambassador to the OECD. Agreed that Japan would make expedited written reports every plenary starting in June 2022 concerning its legislative progress. Also agreed to organise a technical mission focused on enforcement in autumn 2022.

Ongoing and future WGB projects and events

The WGB:

- Agreed to designate Danielle Goudriaan, the current European Prosecutor for the Netherlands, as the new WGB Chair as of 1 January 2023.
- Discussed the OECD Council's decision to take the first step in accession discussions with six candidate countries to OECD membership: Argentina, Brazil, Bulgaria, Croatia, Peru and Romania. Discussed the WGB's Accession Core Principles that will be applicable to candidate countries.
- Continued discussions on the impact of data protection regulations on the WGB's work.

Tour de table

The WGB:

- Considered Argentina's written report on pending legislation and agreed to ask Argentina to provide a report in June 2022, as part of its Phase 3bis additional written follow-up report.
- Heard updates provided by Argentina, Brazil, Chile and Colombia on their steps taken to implement and enforce the Convention.