

## Overview of Data

Saudi Arabia's indicators for corruption and governance are clearly above global averages. Despite this, the country has seen an elevated share of FCPA enforcement actions both in total and in relation to the size of its economy. FCPA enforcement has targeted aviation, oil & gas, defense, and utilities sectors.

Corruption and Governance Indicators	Saudi Arabia	G7 Average
Transparency International Corruption Perceptions Index	53	73
World Bank Control of Corruption Score	66	87
World Bank Rule of Law Score	59	77
Major Correlates of Corruption		
Nominal GDP Per Capita Percentile Rank	50	89
World Bank Government Effectiveness Score	65	89
World Bank Enterprise Survey Responses	Saudi Arabia	Top 10 Countries
Share of firms reporting at least one bribe request		1.4%
Share of firms expected to give gifts to secure government contract	No Data	1.9%
Share of firms expected to give gifts to officials to "get things done"		1.5%
Share of businesses reporting corruption is a major constraint		7.5%

*\*All indicators are scores/100 or are percentile ranks, 100=best. Some scores have been adjusted accordingly. 1-33 34-66 67-100.*

## Illustrative FCPA Cases (as reported)

Total FCPA Enforcement: 15 Cases

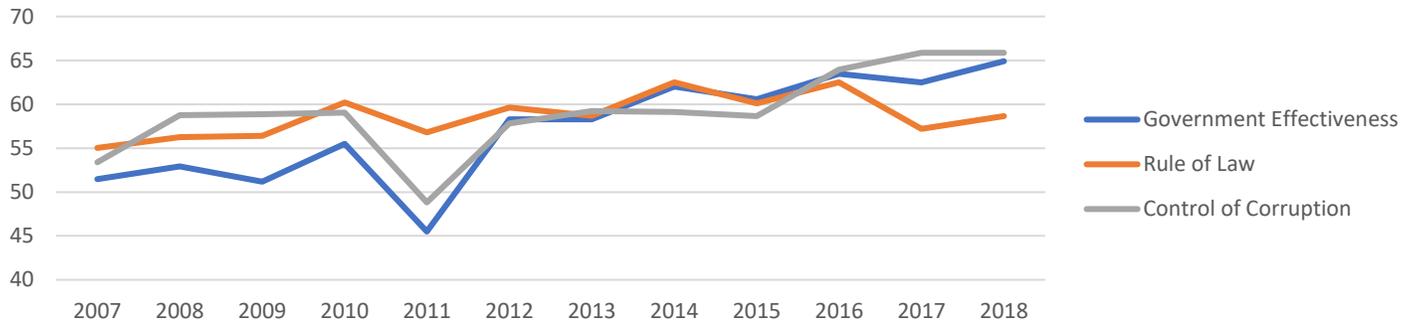
- **Embraer**—The Brazilian aviation company paid USD 205 million in 2016 to settle charges that it had bribed Saudi and other government officials to secure the sale of aircraft.
- **FLIR Systems**—The American defense contractor was held liable in 2014 for actions taken by employees who allegedly provided officials of Saudi Arabia's Ministry of Interior with expensive travel and gifts such as watches. These inducements were reportedly meant to secure multimillion-dollar contracts for infrared and other imaging technology.
- **Alstom**—The French infrastructure contracting firm pleaded guilty to paying at least USD 75 million in bribes to secure power projects with state-owned and controlled companies in five countries including Saudi Arabia from 1999 until 2011. Alstom was assessed criminal penalties of USD 772 million in 2014.
- **Wyeth** – The pharmaceutical firm's Saudi subsidiary allegedly made illegal cash payments to a Saudi customs official for the release of a shipment of marketing materials that had been detained for lack of approval. This prohibited payment was one part of a 2012 multi-jurisdictional settlement of several matters amounting to nearly USD 19 million.

## Information Accessibility and Transparency

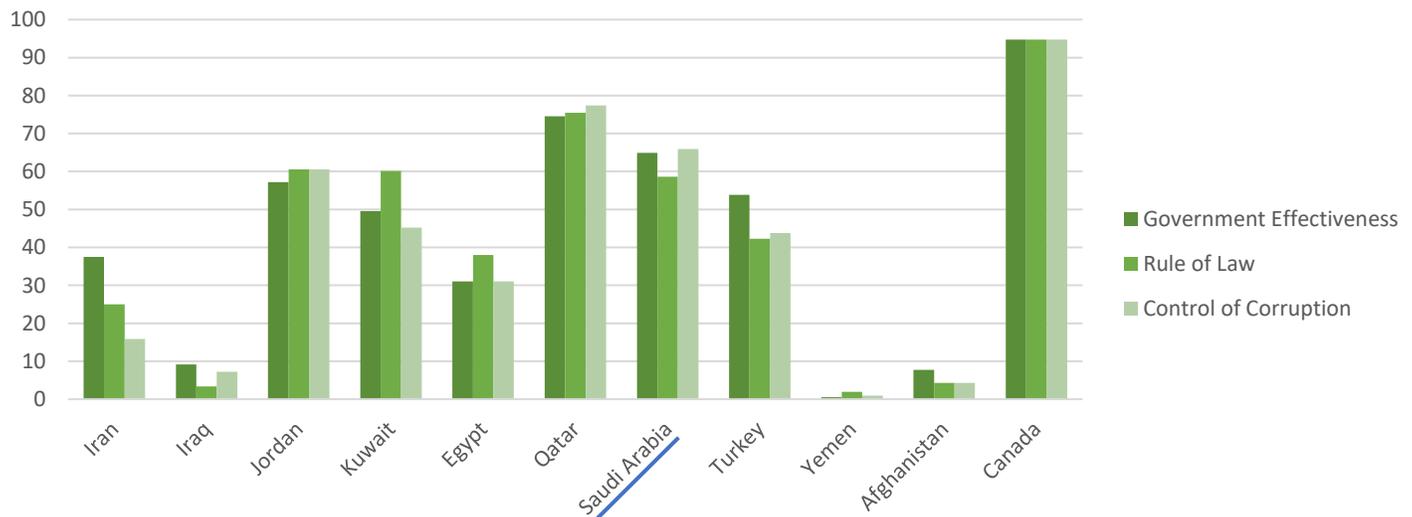
Corporate Records	●	Records are complete and include shareholding information. However, records must be accessed in-person.
Freedom of Press	●	Reporters without Borders rank 169/180 (180=worst) Freedom House score 86/100, "not free" (100=least free)
Language Accessibility	●	Several factors make machine translated research in Arabic difficult.
Financial Disclosure	●	Tax Justice Network Financial Secrecy Score—70 (100=most secretive).

● Poor ● Moderate ● Accessible

## Trendlines—World Bank Worldwide Governance Indicators (100=best)



## Country Comparison—World Bank Worldwide Governance Indicators (100=best)



## Context: Corruption in Saudi Arabia

No detailed survey data on corruption from either the World Bank or Transparency International is available for Saudi Arabia. FCPA enforcement indicates risks in the usual problem sectors, such as defense, aviation, and oil and gas. Additional risks may arise in connection with quasi-governmental or charitable organizations as some members of the royal family may be considered government officials under the FCPA. A recent high-profile anticorruption campaign which reportedly recovered USD 100 billion in allegedly corrupt takings over two years has not made a significant impact on any of Saudi Arabia's governance indicators.

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