



Hughes Hubbard & Reed

Hughes Hubbard Assists Large Chinese SOE with Successful Release from World Bank Sanction

HHR团队助力中国某国有施工企业顺利获得世界银行解除制裁

In July 2022, the World Bank Group's Integrity Compliance Officer notified a large Chinese state-owned company ("Company") and client of Hughes Hubbard & Reed ("HHR") that it had satisfied the conditions for release from the World Bank sanction.

近期,世界银行(“世行”)诚信合规办公室提前发出正式通知,告知中国某国有施工企业(“公司”)已满足了解禁条件,按期解除制裁!

The World Bank had debarred the company in July 2018 in connection with a World Bank project in China. Under the terms of the Negotiated Settlement Agreement with the World Bank, the Company agreed to develop an integrity compliance program consistent with the principles set out in the World Bank Group's Integrity Compliance Guidelines and implement it across the Company's headquarters as well as its subsidiaries and branches directly or indirectly controlled by the Company.

2018年7月,该公司在参与世界银行在中国某项目的过程中受到世行的制裁。根据公司与世行达成的《和解协议》,公司须制定一套符合《世界银行诚信合规指南》原则的诚信合规制度,并在集团总部及其分子公司全面实施。

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The Company promptly appointed Christine Kang, who has extensive experience in handling multi-lateral development bank (“MDB”) investigations and sanctions, as its counsel for this matter. Christine and her team worked closely with the Company’s compliance function to develop and implement a compliance program that satisfied its obligations to the World Bank as well as relevant Chinese national compliance guidelines.

公司随即聘请在多边开发银行调查和合规领域拥有丰富成功经验的康义律师担任本项目的牵头律师。康律师带领团队与公司的合规部门密切合作，迅速起草并建立了符合世行合规政策原则以及中国国内合规标准的诚信合规制度。

With support from the Company’s leadership and compliance function, Christine and her team advised and assisted the Company in fully implementing the integrity compliance program, including by conducting compliance training for management and employees, carried out group-wide risk assessments, coordinated the site visits to the Company’s headquarters and subsidiaries, and facilitated interviews with numerous employees of the Company, among others.

在公司领导和公司合规部门的大力支持下，康律师及其团队指导和协助公司全面推动实施诚信合规制度，为公司管理层和员工进行合规培训，协助公司开展全面风险评估，在公司总部及其他分子公司进行实地考察、对公司管理层和员工进行访谈等。

In bringing the compliance rectification work to its successful conclusion, the HHR team led by Christine, Mike Huneke, and Ayoka Akinosi, as well as Daniel Chan and Wilson Wang, worked with the Company’s compliance function in drafting a comprehensive application for release from sanction to demonstrate the effectiveness of the Company’s integrity compliance program during the past four years and compliance with the terms of the agreement.

在合规整改工作的最后阶段，由康义律师、Mike Huneke律师、Ayoka Akinosi律师、陈孝业律师和王一凡律师组成的HHR律师团队与公司合规部门密切配合，高效率起草了内容详实、支持证据充分的英文版《解禁申请》，全面汇报公司在过去四年中各项合规工作所取得的进展和成绩，有力证明公司已经全面满足了《和解协议》项下的解禁条件。

This is the third Chinese company counseled by Christine Kang regarding successful release from MDB sanction in 2022. The matter also demonstrates the HHR team’s deep understanding and record

of accomplishment of assisting Chinese state-owned companies in developing and implementing a compliance program in line with the World Bank Group's requirements as well as Chinese compliance requirements.

这是2022年以来第三家中国国有企业在康律师的指导协助下获得多边开发银行的成功解除制裁!本项目的成功解禁也再次展示了HHR团队对于世界银行等多边开发银行合规准则和监管要求的深刻把握,在合规强化语境下统筹建设和实施中国国有企业高标准合规管理体系的丰富实践经验,以及HHR团队在多边开发银行制裁项目的世界领先地位!

The HHR counsel team advising on this matter includes Christine Kang, Mike Huneke, Ayoka Akinosi, Daniel Chan, and Wilson Wang.

本项目的HHR团队成员包括康义、Mike Huneke、Ayoka Akinosi、陈孝业、王一凡。



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