



Hughes Hubbard & Reed

HHR 团队协助中国某大型企业成功获得世界银行解除制裁 HHR Team Assists Large Chinese Company with Successful Release from 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，告知某大型公司已满足了解禁条件，按期解除制裁！

In early March, the World Bank Integrity Compliance Officer officially notified a large Chinese company that is a client of Hughes Hubbard & Reed (“HHR”) that the company had satisfied the conditions for release from debarment, and would be released from sanction on time! The release has now occurred.

该公司被世行制裁后，聘请在多边开发银行合规领域拥有丰富成功经验的康义律师及其团队担任公司合规整改和项目调查的牵头律师，协助公司建立和实施符合世界银行标准的合规制度，配合世行指派的合规监管人(“监管人”)和合规调查人(“调查人”)团队工作。

After being sanctioned by the World Bank, the company appointed Christine Kang and her team, who have extensive experience in handling multilateral development bank (“MDB”) compliance matters, as its counsel for compliance rectification and project investigation, including adopting and implementing an integrity compliance program in line with World Bank standards, and cooperating with the independent compliance monitor and the independent investigator.

在公司领导的大力支持下以及公司合规团队的刻苦努力和积极配合下，康律师及其团队迅速起草并建立了符合世行诚信合规标准和国家相关合规要求的合规制度，全面适用于公司的国内和海外业务；为公司员工多次进行全面和专项合规培训，协助公司在全系统的境内及海外业务中落地执行合规制度。

律所广告：敬告读者上述项目成果公告并不承诺保证获得相似结果。

Attorney advertising. Readers are advised that prior results do not guarantee a similar outcome. No aspect of this advertisement has been approved by the Supreme Court of New Jersey. For information regarding the selection process of awards, please visit <https://www.hugheshubbard.com/legal-notice-methodologies>.

With support from the company's leadership and the efforts of the company's compliance function, Christine and her team developed a set of compliance rules in line with the World Bank's integrity compliance standards and relevant Chinese national compliance guidelines, which are applicable to both domestic and overseas businesses of the company, conducted comprehensive and targeted compliance trainings for the company's employees, and assisted the company in implementing the compliance rules across the entire group.

在合规整改工作的冲刺阶段，康义律师、Mike Huneke律师、Tamara Kraljic律师和Ayoka Akinosi律师带领的HHR团队与公司的合规部门密切配合，高效率起草了内容详实、支持性文件充足的英文版《解禁申请》，全面汇报公司在过去两年半中认真执行合规制度，包括投标、第三方尽职调查、合同合规、礼品招待、捐赠赞助等各个领域、各项合规工作所取得的进展，以及深入开展合规培训、不断完善和优化合规制度的合规整改工作成绩。

During the final stages of the compliance rectification work, the HHR counsel team led by Christine Kang, Mike Huneke, Tamara Kraljic, and Ayoka Akinosi worked with the company's compliance function in drafting a comprehensive Application for Release with supporting exhibits, to demonstrate the company's progress in the implementation of a compliance system over the past two and a half years, including regarding bidding, third party due diligence, contracts, gifts and hospitality, donations and sponsorship, compliance trainings, as well as the revision and improvement of its compliance rules.

近期，世行诚信合规办公室提前发出正式通知，告知公司已满足《和解协议》下的解禁条件，公司按期解除制裁！在解禁通知中，世行官员对公司取得的合规工作成果予以高度赞赏。

In early March, the World Bank Integrity Compliance Officer officially notified the company that the company had satisfied the conditions for release under the settlement agreement, and is released from sanction on time! In the notice of release from sanction, the World Bank officials appreciated the company's efforts in working toward satisfaction of the conditions for their release.

该项目的成功解禁不仅是对公司不断完善合规管理工作、大幅提升合规管理水平的充分认可，也为中国特大型企业建设落实符合国际标准的合规管理体系进行了开创性地成功探索并树立了优秀典范！作为协助中国企业开展全面合规整改并按期解禁的又一成功案例，该项目的成功进一步展示了HHR团队对多边开发银行合规准则和监管要求的精准把握，统筹特大型企业构建并实施高标准合规管理体系的高水准业务能力，也再次证明HHR团队在处理多边开发银行调查合规领域的国际领先地位！

The successful release of the company is not only a recognition of its continuous progress in compliance rectification and improvement of compliance management, but also serves as an excellent model and a pioneering example of a large Chinese enterprise adopting and implementing a compliance program consistent with international compliance standards. As another successful case of assisting Chinese companies in their comprehensive compliance rectification to be released from MDB sanction, it demonstrates HHR team's experience and capability in advising large-scale corporations

how to implement high-quality compliance programs consistent with MDB compliance guidelines and regulatory requirements, as a leader in the field of MDB investigations and compliance matters.

本项目的HHR团队成员包括康义、Mike Huneke、Tamara Kraljic、Ayoka Akinosi、陈孝业、王一凡、Natasha Faisal、Kenneth Corte。

The HHR counsel team advising on this matter includes Christine Kang, Mike Huneke, Tamara Kraljic, Ayoka Akinosi, Daniel Chan, Wilson Wang, Natasha Faisal, and Kenneth Corte.



康义 (Christine Kang) • Partner
christine.kang@hugheshubbard.com



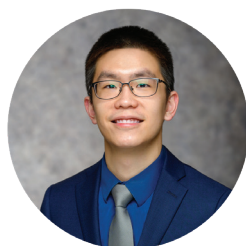
Mike Huneke • Partner
michael.huneke@hugheshubbard.com



Tamara Kraljic • Counsel
tamara.kraljic@hugheshubbard.com



Ayoka Akinosi • Associate
ayoka.akinosi@hugheshubbard.com



Daniel Chan • Law Clerk
daniel.chan@hugheshubbard.com



Wilson Wang • Law Clerk
wilson.wang@hugheshubbard.com