

TRUMP'S EXECUTIVE ORDER ORDERING TO PAUSE FCPA ACTIONS

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The President of the United States, Donald J. Trump, signs an Executive Order ordering to pause Foreign Corrupt Practices Act or FCPA actions, as a means to restore American competitiveness and security.

- On February 10, 2025, President Donald J. Trump signed an Executive Order directing Attorney General, Pam Bondi, to revise the Foreign Corrupt Practices Act ("FCPA").
- The Executive Order calls to review past and existing FCPA actions and issue revised FCPA enforcement guidance, which will govern future investigations and enforcement actions, promoting American competitiveness and the efficient use of federal law enforcement rules.
- The FCPA is a law enacted in 1977 that applies, among others, to foreigners, and prohibits acts of corruption of foreign public officials.

- Despite this U.S. Executive Order, in Mexico, corruption, which includes, among other concepts, bribery, illegal inducement, and illegal inducement of public officials, constitutes a serious offense under Mexican law, which holds companies to respond to criminal and administrative sanctions, ranging from the suspension of their activities to their dissolution.

- The adoption of adequate compliance models, including an integrity policy and due control, through which vulnerable areas in the structure and operations of the organization are identified and the level of compliance with applicable regulations is measured, will allow to control, prevent and better manage the risk of corruption within companies, in accordance with the provisions of both Mexican and international law.

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