

It does not matter who stays or who leaves from EU, now or in the near future. Even if the major companies decide to settle their headquarters in Portugal, they will certainly want to remain in GB or any other European country relevant for its business. For compliance purposes, in most areas, the demands are the same, considering the Bribery Act, American regulations or any others: what matters is where your business is. So, each company (or group) should look through all the relevant regulations in countries of its business influence, find, for each regulated area, an international common denominator and build a strong system with the most demanding rules.

The problem today for the preparation of a global compliance policy is not any European exit, but the immaturity of the liability of legal persons in many countries, with not always established models, even in the same country, for criminal liability and different sectors of administrative liability: *master-servant liability*, *lack of supervision liability*, *objective liability* (more recently) and even *identification theory* are all still possible solutions in the global market – for a quick overview of these different systems, please see, among others, the [Technical Paper on Comparative analysis of the Liability of Legal Persons \(Corporate Liability\) for Criminal Offences of Corruption](#), prepared by Georgi Rupchev, Council of Europe expert, and the [OECD report on Liability of Legal Persons for Corruption in Eastern Europe and Central Asia \(2015\)](#).

For compliance officers and, mostly, for the preparation of global compliance policies, (almost) nothing really changed: the diversity challenge has been always there.