



RPC

Financial crime
compliance

RPC at a glance

RPC is a modern, ambitious firm with high-calibre lawyers dedicated to delivering clear, pragmatic and outcome-focused advice. RPC is headquartered in London with offices in Bristol, Singapore and Hong Kong. Our lawyers are market leaders, our clients are household names and together we achieve award-winning results which have seen RPC regularly voted amongst the best for commercial advice.

We act for a range of clients – from the world’s leading companies such as Google, Meta, Jones Lang LaSalle, major football clubs including Newcastle United and leading state-owned enterprises such as the BBC – to start-ups. Our market-leading, multidisciplinary teams advise clients on a wide range of legal areas and are consistently ranked highly by both Legal 500 and Chambers & Partners.

Global reach

A high proportion of our work is international in nature, involving cross border issues. We are a founding member of the TerraLex network, an international ‘best friend’ network of law firms with over 19,000 lawyers worldwide.

Over the last 20 years, TerraLex has worked to bring law firms around the world together to share expertise, industry knowledge and enable clients to get the best service wherever their matter happens to be based. Our membership of TerraLex enhances our services by providing easy access to trusted local lawyers for advice, monitoring or transactions.

“RPC is an absolutely phenomenal firm. It is second-to-none in terms of the full service it can offer to large multinational clients, and small clients alike.”

Legal 500, 2024

“RPC is a fantastic firm and a great alternative to some of the larger London practices – highly personalised service and genuine client commitment.”

Legal 500 2023

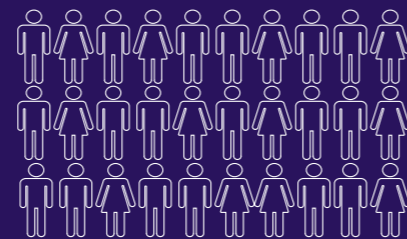
“The service was excellent. The people we were dealing with were highly experienced and always present and available.”

Chambers & Partners 2020

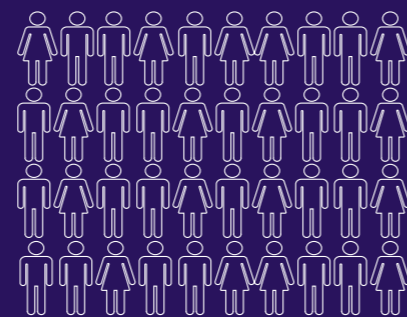
Specialists



130+ partners



490+ total lawyers



1100+ people



Financial crime compliance

RPC’s White Collar Crime & Compliance team is trusted by some of the world’s leading businesses to advise and support them in conducting internal investigations, provide support with prosecutors and regulators, manage compliance risks and develop robust and effective systems and controls.

We are truly international and our practice covers risks and compliance projects across the globe, for clients based in the UK, Europe, Asia, USA and the Middle East. This is supported by access to on-the-ground partner legal firms in over 100 countries through the TerraLex legal network.

Our clients include FTSE 100 companies in sectors including insurance, oil and gas, engineering, real estate, telecommunications, hospitality, media, retail, agriculture, banking and foodservices. These clients draw on the technical and practical expertise of our team members. Our team includes those who have worked for prosecutors (including the UK Serious Fraud Office) and certified auditors for ISO 37001. Senior members of the team have led in house financial crime teams in a range of sectors.

We are committed to providing innovative and cost-effective solutions for our clients, with a focus on leveraging cutting edge technology. We are experienced in developing compliance solutions for clients. This includes developing and implementing third party risk management platforms and related systems, such as designing online training courses, whistleblowing systems and risk assessment programmes.

“A commercially minded team with strong leadership and a positive approach to dealing with issues. The team are excellent collaborators...”

Legal 500, 2024

Key areas of focus

- ESG
- Anti-bribery and corruption
- Fraud and theft
- Whistleblowing
- Anti-money laundering and counter terrorist financing
- Economic sanctions
- Conflicts of interest
- Competition and anti-trust
- Facilitation of tax evasion
- Gifts and entertainment

Our services

- Risk assessment
- Financial crime policy and procedure drafting, review and implementation
- Compliance programme maturity review and gap analysis
- Board training
- Industry benchmarking
- Third party due diligence and risk mitigation
- Due diligence on mergers and acquisitions
- Internal investigations and reports
- Development of training and e-learning materials
- Asset tracing
- Advice on risks associated with new products, jurisdictions and third parties
- KYC Remediations
- ISO 37001 Certification
- Development and tuning of transaction monitoring systems

“The type of work they do means clients are often making high stakes decisions on limited information, and the team bring a cool eye to what can be a pressure-cooker situation.”

Legal 500, 2024

“This team is growing, and is really making a mark... They are very client focussed, and with real experience of cutting through problems to reach the outcome their clients need”.

Legal 500, 2023



Anti-bribery and corruption

Bribery and corruption present significant risks for entities of all sizes. Globalisation, the growth of “just in time” supply chains and the pressures created by the COVID-19 pandemic have all contributed to increased exposure to high risk jurisdictions, third parties and business practices.

Prosecutors are increasingly aggressive in their pursuit of bribery offences and compliance failures, which can extend to activities anywhere in the world. As such, critical business partners such as banks, insurers and key suppliers expect companies to adopt a “zero-tolerance” approach to bribery and to take active measures to prevent it.

Our team understands the importance of developing a positive and robust compliance culture and responding quickly and effectively when potential bribery issues arise.

Our team is trusted by corporates and authorities alike. In particular, the team was appointed by the English Court and the UK Serious Fraud Office (SFO) to act as an independent reviewer of the compliance programme of a company subject to a deferred prosecution agreement between 2021 – 2023.

Sam Tate, the partner who leads our practice, has unique experience in this area, having led on the Court-appointed independent reviewer role for the SFO and served in a previous role as the subject matter expert in anti-corruption at BP Plc. Sam is also the co-author of a leading UK anti-corruption compliance textbook “Bribery: A Compliance Handbook” (Bloomsbury, June 2014, second edition published in 2021).

We regularly work with companies and authorities across a wide range of different sectors to review or develop their anti-corruption programmes. We carry out these reviews in line with international regulatory requirements, including the UK Bribery Act and US Foreign Corrupt Practices Act, along with industry and civil society best practices.

Companies our team has worked with on anti-bribery or similar financial crime matters include the following:

- Santander
- the Financial Times
- the City of NEOM
- Compass Group Plc
- Jones Lang LaSalle
- Intercontinental Hotels Group
- European Bank of Reconstruction and Development
- Sports Direct
- Warner Music
- Bonhams
- the Federal Republic of Nigeria.



Case studies

Monitorships

- Acting as a Court-appointed independent reviewer of a corporate’s anti-bribery compliance programme as part of its deferred prosecution agreement with the UK SFO. This role involved two years of monitoring the development of the compliance programme, testing it and providing challenge where needed, as well as conducting interviews with staff, providing training to senior management and regular reports to the Serious Fraud Office.

Compliance programme gap analysis

- Developing and implementing a comprehensive Anti-Bribery Action Plan for a high-profile multinational business headquartered in the UAE. The project involved gap analysis of the client’s anti-bribery controls across nine key jurisdictions (UAE, Egypt, Morocco, Italy, Spain, Serbia, Romania, India and USA) and drafting a suite of new policies and procedures, including Anti-Bribery and Corruption, Fraud, Speaking Up, Conflicts of Interest, Sanctions and Third Party Corruption Risks.

Compliance programme development

- Drafting a full suite of financial crime compliance policies for an international trade finance provider with extensive global operations, including Anti-Bribery and Corruption Policy, Fraud Policy, Sanctions Policy, Anti Money Laundering and Counter-Terrorist Financing Policy, Anti-Tax Evasion Policy, Data Protection Policy and Terms of Reference for a new Ethics Committee.

Third party risk management

- Advising the City of NEOM in Saudi Arabia on its Third Party Risk Management system. This involved designing an end-to-end procedure for assessing third party supplier risk across a wide range of areas, including financial crime risks such as fraud, bribery and corruption, money laundering and sanctions evasion.

Global risk assessments

- Conducting a comprehensive bribery and tax evasion risk assessment for a multinational entertainment and record label conglomerate. This included the creation of a bespoke risk assessment methodology tailored to the client’s profile, industry and geographical reach, which was designed to measure numerically the inherent risk of a wide range of bribery and tax evasion typologies, the effectiveness of relevant controls, and the residual risk presented to the client.
- Conducting a bribery and corruption risk assessment for a global private equity house for its EMEA business. We created a bespoke methodology for assessing the client’s risk profile in light of the industries and jurisdictions in which it operated. We produced a remediation plan for the group, which was tailored to address the higher residual risk areas remaining in the business.



Our risk assessment offering

The foundation of any successful compliance programme is a comprehensive and regular assessment of the organisation's risk profile. We have extensive experience in carrying out risk assessments in a range of areas including bribery and corruption, fraud, money laundering, sanctions and the facilitation of tax evasion.

We take a proportionate and data-led approach to risk assessment, which is driven by the client's specific business operations and needs. We develop a bespoke risk matrix for each area assessed, using objective metrics to measure the inherent risks the business faces, the effectiveness of the controls in place and the residual risks that still reside in the business.

We use detailed numerical analysis to grade the risk levels in different areas so that changing risk profiles can be identified quickly year on year. Where gaps in controls are found, we are highly experienced in designing enhancements to reduce risk levels. Given the extensive in-house experience in our team, we know how important it is to focus these recommendations on what is practical and proportionate for a business in its particular circumstances and our recommendations are tailored accordingly.

We work with our clients following a risk assessment to support the business in responding to the findings, including reporting to the Board, implementing compliance enhancements, and designing and delivering training to staff as needed.



Our team



Sam Tate
Partner – Head of white collar crime and compliance
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Sam Tate is a leading financial crime lawyer with a global following and significant experience working on international financial crime matters. He specialises in implementing compliance programmes within multi-national companies, resolving complex corruption and compliance concerns and working effectively with time-saving financial crime technology.

Between 2016 - 2018 Sam advised Lisa Osofsky, who went on to become the Director of the UK's Serious Fraud Office (2018 – 2023), and his unique experience includes over four years as the Subject Matter Expert in Anti -Corruption at BP Plc.

In addition to being instructed on these highly sensitive and political financial crime matters, Sam is one of only a handful of lawyers to have led negotiations with the Serious Fraud Office (on behalf of clients) on Deferred Prosecution Agreements (DPAs).

Sam was appointed (pursuant to a DPA and subject to a court order for confidentiality) as the Independent Reviewer of a corporate compliance programme, making RPC the first UK law firm appointed to perform such a role. Sam also took on leadership roles in global banking monitorships for the US Department of Justice and the UK FCA (HSBC and Credit Agricole). Sam is an adviser to NEOM (a \$500bn city development project in Saudi Arabia) on financial crime matters.

In a technical area where barristers often take the lead role as expert, Sam has challenged the norm by being appointed to RUS's Taskforce on a Transatlantic Response to Illicit Finance.

With a keen interest in making compliance work efficiently and cost-effectively, Sam is an accredited ISO 37001 Lead Auditor and has acted as an expert legal advisor to significant Transparency International publications.

Memberships and publications

- Co-author of "Bribery: A Compliance Handbook" published by Bloomsbury Legal, June 2014 (2nd edition published in March 2021), one of the leading anti-corruption text books for bribery law and practice. Sir Keir Starmer KCB KC, UK Director of Public Prosecutions 2008-2013 described the book as "a first-rate guide for all legal practitioners called upon to advise on any issue concerning bribery".
- Member of an expert panel creating Transparency International and PWC's "Guide to Conducting Anti-Corruption Risk Assessments", 2013, which remains a global benchmark for assessing anti-corruption risk.
- Expert adviser to Transparency International UK in relation to "Open Business", a 2020 publication relating to the ways in which companies can successfully use compliance information.
- Honorary Member of the Institute of Commercial and Corporate Law for work in financial crime.
- Visiting Lecturer at Durham University LL.M.
- Guest speaker at Vodafone, Santander, Metropolitan Police, Association of Corporate Investigators and conferences including CS, AMLP and GIR.

Directories

"Sam Tate is a walking encyclopedia about the law of corporate crime and leads a great team of enthusiastic and hardworking associates. They are fast but careful, good and responsive."

"I have particularly worked with Sam Tate who is hugely skilled, experienced and (disarmingly) intelligent."

Legal 500, 2024 – Regulatory investigations and corporate crime

"Sam Tate – very client friendly, completely focussed on getting the right outcome for the client. Extremely good negotiator."

"Sam Tate is a great communicator, meticulous and extremely personable."

"Sam Tate – commercially minded lawyer who approaches problems from the client's perspective and has an outstanding knowledge of the law in this area. He has a great ability to boil a complicated issue down to its central parts and then propose a workable solution."

Legal 500, 2023 – Regulatory investigations and corporate crime



Lucy Kerr
Senior Associate – Financial crime and compliance
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Lucy is a senior lawyer in the team and advises clients on all aspects of investigations, compliance and policy matters, with a particular focus on bribery, corruption and fraud. She leverages her significant experience acting for clients in investigations and regulatory enforcement proceedings to provide meaningful and pragmatic advice to clients across all sectors. Lucy recently acted for the Federal Republic of Nigeria in a dispute with Glencore regarding its admitted criminal conduct in Nigeria's oil industry.

Lucy is highly regarded by clients and has been identified in Legal 500 as a 'rising star' within the legal profession.

"Lucy Kerr is an associate on the rise, balancing deep knowledge of the subject with an unflappable demeanor and a positive outlook. When the going gets tough, you want her on your team."

Legal 500 2024



Toby Lamarque
Managing Consultant – Financial crime and compliance
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Toby Lamarque is a specialist in financial crime compliance, with extensive experience advising corporates on risks and controls.

Toby has worked with companies across a wide range of different sectors to develop their anti-corruption programmes in line with international regulatory requirements, including the UK Bribery Act, US Foreign Corrupt Practices Act and industry best practices.

In addition to pragmatic policy drafting and implementation, he specialises in taking a mathematical approach to risk calculation and developing bespoke risk rating methodologies and risk mitigation strategies.

Toby has recently spent time in Hong Kong advising a client regarding a regulatory investigation in the banking industry.



Osama Al Jayousi
Expert Consultant – Financial crime and compliance
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Osama has extensive experience in risk management and governance in the construction services sector as an auditor and as the former Head of Compliance of a major corporation. Osama advises a wide range of corporate clients on an enhanced approach to risk and governance and is regularly invited to speak at industry conferences for professionals.

Osama has an in-depth understanding of different cultures and the particular risk implications, through extensive international compliance experience in Europe, North American, Africa and the Middle East. He is a native Arabic speaker.



Kate Langley
Senior Associate – Financial crime and compliance
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Kate Langley is a Senior Associate in the team and advises clients on white collar crime matters, from compliance programmes to contentious investigations and regulatory liaison.

Kate has extensive financial crime compliance experience, including anti-money laundering, anti-bribery and anti-tax evasion, along with conducting investigations into suspected fraud.



Tom Jenkins
Senior Associate – Financial crime and compliance
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Tom Jenkins has extensive experience conducting anti-corruption investigations and advising on the implementation and enhancement of compliance programmes. Tom has advised clients facing a wide range of white-collar and regulatory defence challenges, including working on multi-jurisdictional investigations involving bribery and corruption, fraud and allegations of market abuse.

Tom has worked on negotiated resolutions of bribery and corruption cases with regulators and prosecutors in a range of countries including the UK's Serious Fraud Office, the US Department of Justice as well as authorities in Brazil. Tom has also assisted clients in a broad range of sectors, including engineering and heavy industry, aviation, oil and gas, banking and private equity, commodities trading and healthcare.

Tom is recognised by Legal 500 as a Rising star.

"Superstar"
Legal 500 2024

Our team (continued)



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Robert is an Associate in the team with experience advising high net worth individuals and corporate clients in regulatory enforcement actions brought by both the US and UK authorities. Robert has also assisted clients involved in fraud and corruption investigations internationally.



Sarah Barrie
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Sarah is an Associate in the team with experience in acting for corporate clients advising on their financial crime compliance programmes. Sarah trained as a lawyer in the Middle East and speaks Arabic.



George Booth-Clibborn
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George is an Associate in the team and advises clients on various white collar crime matters, including internal investigations and corporate compliance programmes.



Alexandra Prato
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Alexandra is an Associate in the team and advises clients on bribery and corruption matters, including their corporate compliance programmes.

