

JLT Specialty Limited

Case ID:

ST-464

Case Cluster :

JLT Specialty Limited

Jurisdiction of Settlement:

United Kingdom

Jurisdiction of Settlement / Enforcement Agency:

Financial Conduct Authority

Jurisdiction of Foreign Public Official(s) :

Cameroon, China, Ecuador, Egypt, Gabon, Nigeria, Sudan, Unspecified West African countries

Year of Settlement:

2013

Month/Day of Settlement (or Notes):

12/19

Other Jurisdictions of Settlement:

Unknown

Settlement with Individual or Legal Person?:

Legal Person

Type of Settlement:

Administrative

Legal Form of Settlement:

Final Notice

Monetary Sanctions (Types):

Civil Penalty

Total Monetary Sanctions (US\$):

\$3,063,080

Civil Disgorgement of Profits (US\$) :

\$0

Civil Prejudgment Interest (US\$) :

\$0

Civil Fine / Penalty (US\$):

\$3,063,080

Monetary Sanctions Returned / Ordered Returned (US\$):

\$0

Monetary Sanctions Returned / Ordered Returned (Explanation):

NA

UNCAC Articles(s) Implicated:

Art.16

OECD Anti-Bribery Convention Articles Implicated:

Art. 1, Art. 8

Offenses - Alleged:

Lack of Bribery Controls

Offenses - Settled:

Lack of Bribery Controls

Public Procurement Contract / SOE Involved?:

Yes

Summary:

According to the UK Financial Conduct Authority's Final Notice, JLT Specialty Limited "provides insurance broking, risk management and claims consulting services to a wide range of national and international corporate clients. 2.2. The Authority has found that JLTSL breached Principle 3 by failing to take reasonable care to organise and control its affairs responsibly and effectively, with adequate risk management systems and controls for countering the risks of bribery and corruption associated with making payments to overseas third parties that helped JLTSL win and retain business from overseas clients (?Overseas Introducers?) in that: (1) during the whole of the Relevant Period, JLTSL failed to conduct adequate due diligence before entering into a relationship with an Overseas Introducer. In particular JLTSL did not take adequate steps to assess whether the Overseas Introducer was connected with the clients it introduced and/or any public officials; (2) during the whole of the Relevant Period, JLTSL failed adequately to assess the risk associated with each piece of new insurance business introduced by an Overseas Introducer, which meant that JLTSL could not ensure that it took sufficient steps to counter the risk of bribery and corruption prior to making payments to Overseas Introducers; and (3) during the period 7 June 2011 to 9 May 2012 (?the Alarm Bells Period?), JLTSL failed adequately to implement its own anti-bribery and corruption policies, which resulted in the risk of JLTSL entering into higher risk relationships with Overseas Introducers without sufficient senior management oversight and approval. Moreover, JLTSL failed to carry out adequate checks, which would have enabled it to identify that its policies were not being implemented correctly. 2.3. The Authority has found no evidence to suggest that JLTSL has permitted any illicit payment or inducement to any Overseas Introducer during the Relevant Period, nor that JLT intended to permit any illicit payment or inducement to any Overseas Introducer during the Relevant Period." (Source: UK FCA Final Notice, File Reference Number 310428, December 19, 2013.)

Sources :

UK Financial Conduct Authority, Final Notice to JLT Specialty Limited, Firm Reference Number 310428, December 19, 2013.