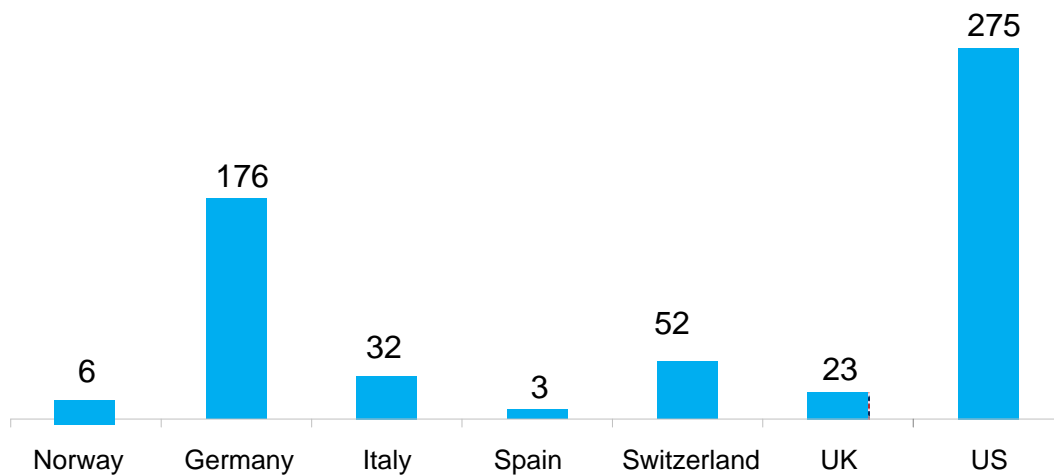


EXPORTING CORRUPTION 2012:

Spain



Foreign Bribery Cases Prosecuted up until 2011:



KEY FIGURES

New in 2011 Total

Bribery cases:

0 3

Major cases:

0 2

Bribery investigations ongoing: 0

Last major case: 2008

POSITIVE DEVELOPMENTS

- Spain ratified the Additional Protocol to the Council of Europe Criminal Law Convention on Corruption in January 2011
- Spain provided assistance in a Swiss-Polish investigation of a case involving the French company Alstom

NEGATIVE DEVELOPMENTS

- No new cases or investigations
- Lack of information about enforcement
- Lack of enforcement

CASE STUDY – [Instalaciones Inabensa SA in Costa Rica](#)

A subsidiary of the Spanish conglomerate Abengoa SA was charged in Spain in 2008 with bribing the then-president of Costa Rica to obtain a US \$ 55 million public contract to lay underground power lines in the city of San Jose. The case was closed by the Central Court because it found that the relevant statute prohibiting foreign bribery did not cover a foreign subsidiary of a company.

RECOMMENDATIONS

- Improve whistleblower protection.
- Introduce more transparency in the Public Prosecutor's Office.
- Provide more resources for combating international corruption.