

Financial Crime Compliance RegDesk



The EU raises the anti-corruption bar: what businesses need to know.

The EU just made a quiet but important shift in **anti-corruption enforcement**, and many firms are behind the curve. On 21 April 2026, the EU Council formally adopted a new **Anti-Corruption Directive** that harmonises and tightens the offence framework and corporate liability with turnover-linked fines across Member States. The Directive still needs national transposition, so local details will vary, but the direction of travel is already clear.

Here's what changes the game in practice

If you only take three things from the new EU Directive, make them these:

- 1. Influence brokering** is no longer a grey zone. The Directive introduces **"trading in influence"**: offering or receiving an undue advantage to exert improper influence over a public official, including via intermediaries, and regardless of whether it "worked". If you rely on third parties who "open doors", your risk map just got bigger.
- 2. Turnover linked fines** change the math. Corporate fines can reach up to **5%** of worldwide turnover or **€40m** for certain offences, plus a wider sanctions toolkit that can hit market access and operations. That moves ABAC from "important" to **board level material**.
- 3.** While an effective compliance programme may mitigate penalties, it won't function as a defence. Translation: **outcomes and evidence will matter more than beautifully written policies**.

The scope is broad ("legal persons", with limited carve-outs), the practical takeaway simple: if you have EU touchpoints, assume you're in scope.

Expect uneven impact across Member States (but the baseline rises everywhere) -

Member States start from different baselines, so impact will vary: some will mostly fine-tune, others will need real offence and sanctions redesign. Belgium may see tighter private-sector bribery rules and higher penalties, with turnover-based fines a new feature in general criminal law. Germany is likely to see more substantive offence changes (including trading in influence) and materially higher corporate fine exposure. The Netherlands may require fewer structural changes because corporate liability and turnover-linked penalties are already relatively developed.

Practical next steps

Member States have 24 months to transpose the Directive. While many large firms already operate established ABAC programmes, use this as an ABAC refresh trigger: run a gap assessment against the harmonized offence set (especially trading in influence), tighten third-party controls around public-official touchpoints, map "leading position" liability exposure, and stress-test whether you can prove compliance programme effectiveness.

Bottom line

The EU isn't just harmonising rules, it's standardising consequences. And the compliance baseline rises in parallel under the EU AML Package, with the AMLR applying directly from **10 July 2027**.



The RegDesk team



Manish Chopra
EVP & Global Head
Risk and Compliance
Financial Services SBU



Jeffrey F. Ingber
Sr. Advisory Consultant
Risk and Compliance
Financial Services SBU



Samar Pratt
Global Leader
FCC Advisory Solutions
Financial Services SBU



Supriyo Guha
Global Leader
FCC Transformation
Financial Services SBU



Tom Kastelein
Benelux Leader
FCC CoE
Financial Services SBU



Mike Roe
Americas Leader
FCC Advisory Solutions
Financial Services SBU



Oliver Hanmer
UK Leader
FCC Advisory Solutions
Financial Services SBU



Maylin Schouten
Senior Consultant
FCC Benelux
Financial Services SBU

About Capgemini

Capgemini is an AI-powered global business and technology transformation partner, delivering tangible business value. We imagine the future of organizations and make it real with AI, technology and people. With our strong heritage of nearly 60 years, we are a responsible and diverse group of 420,000 team members in more than 50 countries. We deliver end-to-end services and solutions with our deep industry expertise and strong partner ecosystem, leveraging our capabilities across strategy, technology, design, engineering and business operations. The Group reported 2024 global revenues of €22.1 billion.

Make it real.
www.capgemini.com