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By Sally March

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At the top of the issues list for Brexit negotiations is what to do about the border—or rather, lack of one—between Northern Ireland and the Republic of Ireland. Further down the list is what Britain’s future role will be in Europol and cross-border criminal investigations. These matters of borders and extraterritoriality came to mind when I read that the first Volkswagen (VW) employee, a German citizen named James Liang, has been sentenced by the U.S. in connection with the emissions scandal. Ten years ago, I was educating colleagues in Europe that the Foreign Corrupt Practices Act (FCPA) applied to them as employees of a company listed in the U.S. The VW case is a stark reminder that for ethics and compliance professionals, there are no borders anymore.

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