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Richard A. Posthuma
University of Texas at El Paso

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Analyzing Business Research on the Foreign Corrupt Practices Act: Clusters, Gaps, and Future Directions

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Richard A. Posthuma^a

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ABSTRACT

This study comprehensively analyzed and summarized business-related research on the Foreign Corrupt Practices Act (FCPA). Research on the FCPA is essential because sanctions for violations have grown substantially, increasing risks for multinational enterprises (MNEs). Recent fines exceeded \$1 billion, and business executives were personally fined and imprisoned (Stanford Foreign Corrupt Practices Act Clearinghouse, 2021). Unfortunately, theory-based and empirically-validated business research has not kept pace with this increased risk. Performance mapping and science mapping pinpointed the most prolific academic fields, the most cited articles, and clusters of authors, journals, and keywords. Analyses identified gaps in the literature. Prior research focused on public policy questions, like the impact of the FCPA on American companies (Shapiro, 2013), the propriety of attempting to regulate foreign business ethics, and international treaties. Moreover, significant clustering and fractionalization into legal academic silos have side-stepped business-related research topics. New and different research directions are proposed.

KEYWORDS

International Business Corruption, Foreign Corrupt Practices Act, Business Ethics, Corporate Compliance Programs, Anti-Bribery and Anti-Corruption (ABAC)

INTRODUCTION

IMPORTANCE OF RESEARCH ON THE FCPA

The control of international business corruption continues to be a severe challenge for MNEs (Sanyal, 2012). The FCPA is a US federal statute intended to reduce corruption by prohibiting bribery of foreign government officials and requiring accounting books and records to verify it has not occurred. MNEs have strong incentives to control this type of corruption and maintain adequate records because the FCPA has hefty sanctions (Cuervo-Cazurra, 2008). In recent years, sanctions imposed on many MNEs have cost millions of dollars. Figure 1 illustrates that the mean dollar amount of sanctions against firms violating the FCPA grew from \$12.6 million in 2015 to \$447.2 million in 2020 (Stanford Foreign Corrupt Practices Act Clearinghouse, 2021). Recent cases included massive sanctions exceeding \$1 billion per firm (Airbus, Goldman Sachs, Ericsson, Odebrecht, Petrobras) (Stanford Foreign Corrupt Practices Act Clearinghouse, 2021; SEC, 2021). Executives have been personally indicted, convicted, and sentenced to prison (Stanford Foreign Corrupt Practices Act Clearinghouse, 2021; SEC, 2021). The appendix shows the number of cases and sanctions per MNE by headquarters country.

^a University of Texas at El Paso, Texas, U.S.

Corresponding Author:

Posthuma (rposthuma@utep.edu)

A BRIEF OVERVIEW OF THE FCPA

A brief summary of the FCPA is provided here to help scholars and practitioners better understand this topic. The FCPA was enacted in 1977 after the Watergate scandal in the US sparked congressional investigations that exposed substantial corporate bribery of foreign government officials (United States Securities and Exchange Commission (SEC) (2021)). The FCPA was enacted to stop international business corruption. The statute prohibits providing anything of value to foreign government officials for a corrupt business purpose, including giving gifts or bribes through third parties. The FCPA also requires firms to keep reasonably detailed books and records of financial transactions and implement adequate internal controls. Both the Department of Justice and the Securities and Exchange Commission enforce the FCPA. Sanctions apply to both corporations and individuals. Investigations often can take four years or longer. Firms may receive notification of the ongoing investigation, and due to the reporting requirements of the Sarbanes-Oxley Act, they disclose ongoing investigations in financial statements. In some cases, violations of the FCPA also encompass other corrupt and illegal activities such as fraud, money laundering, and tax fraud. However, firms can receive significant reductions in sanctions and penalties by voluntarily disclosing corrupt acts and cooperating with government investigators.

Although legal scholars have published extensively on the FCPA in law reviews, there is comparatively little business-related research literature.¹ As illustrated in this paper, the legal literature tends to focus on clusters of high-level public policy issues. Furthermore, there are significant gaps within and between the legal and business-related literature. The lack of micro-level research focused on employees is also a significant gap in this literature. These gaps have not yet been identified because there has been no comprehensive and systematic review of business-related research. Therefore, this study was undertaken to analyze the structure of business-related research on the FCPA, identify gaps in the literature, and suggest future research directions. Several gaps were identified including the lack of research from foreign countries and relatively sparse research in accounting, business, economics, finance, and organizations. Several future directions were identified that suggest multiple topics and theories for research at the individual and organizational levels.

OVERVIEW OF BUSINESS-RELATED RESEARCH LITERATURE

Business research has emphasized the severity of sanctions, but business scholars have also identified other important reasons to focus on the FCPA (Sampath et al., 2018). Violations of the FCPA are forms of corruption that are complex and multifaceted because of the size and scale of corrupt actions, complexities of multi-country business relationships, and difficulties of investigation and enforcement activity involving laws and regulators in multiple countries. Despite this complexity, many business research scholars have experience analyzing MNEs operations across many countries using conceptual and multivariate research methods and theories that can help better understand this multifaceted topic (Cleveland et al., 2009; Cuervo-Cazurra, 2008; Lyon & Maher, 2005). In addition, there is an increasing acceptance across the globe that bribery is morally wrong, as indicated by the growing number of countries that have joined the OECD Anti-Bribery Convention² (Darrough, 2010; Kaikati et al., 2000; Sampath et al., 2018). Thus, business-related research on the FCPA helps to advance our understanding of how firms can act in a socially responsible manner.

¹ Legal scholars are attorneys who primarily publish in law reviews. Business scholars publish primarily in business journals such as accounting, economics, finance, or marketing; and organizational scholars publish in business journals related to business ethics, human resource management, management, organizational behavior and theory, organizational sociology, or strategy.

² The OECD Anti-bribery Convention is an agreement between 44 countries to enact and enforce laws that combat bribery of public officials. The FCPA is a US statute that was one of the first laws to do so.

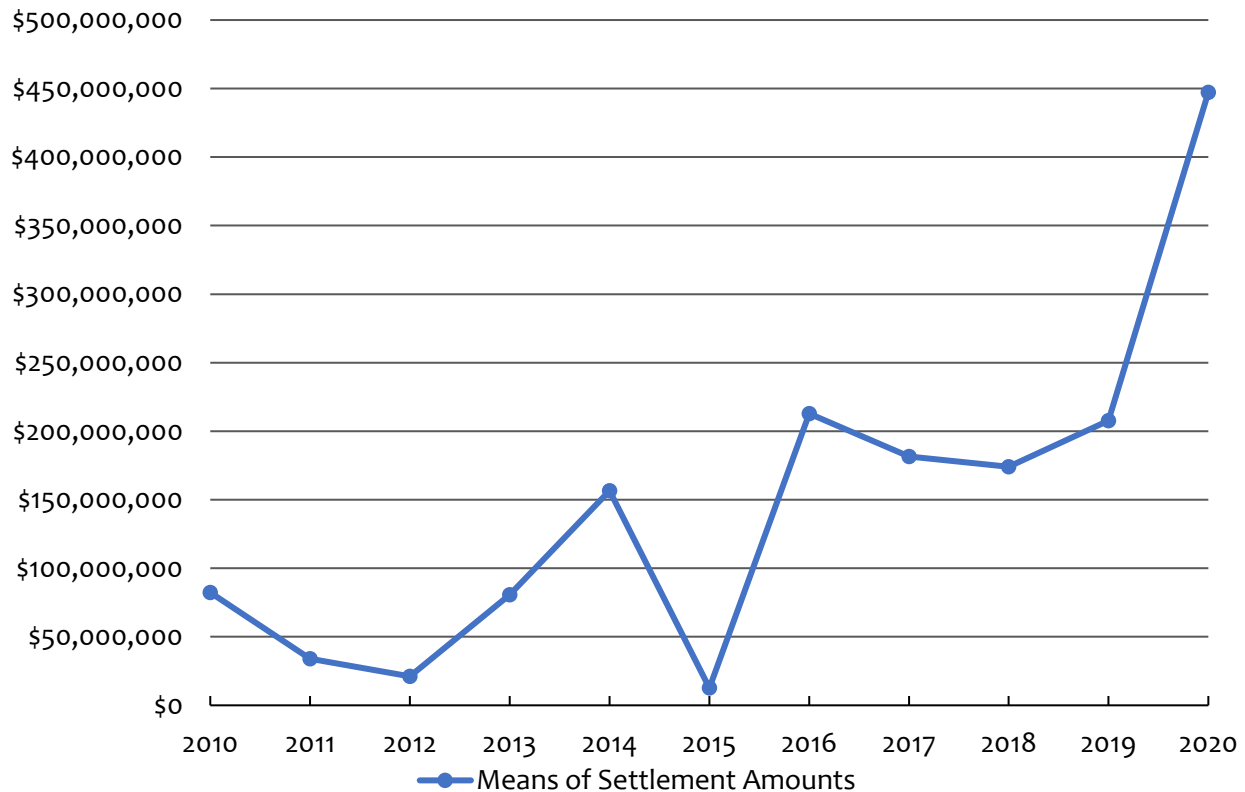


Figure 1. Sanctions for FCPA Violations, Mean Amounts Per Company by Year 2000 to 2020, US Dollars

Data Source: Stanford Foreign Corrupt Practices Act Clearinghouse, 2021. These settlements applied to companies that agreed to the sanctioned amounts. Over this period, there were 164 settlements (yearly: Mean Number of Cases Per Year = 14.9, Standard Deviation of Cases Per Year = 5.9).

The existing literature has used a few different models in attempts to understand the FCPA better. Most studies have adopted an institutional-level focus to examine the relationships between firms and external entities, such as legal institutions, government regulators, markets, auditors, and other firms (Shapiro & Matson, 2008). These tend to adopt a macro-level perspective of the firm looking outward or institutions looking inward at firms (Badua, 2015; Chen et al., 2008; Cuervo-Cazurra, 2016; Lee et al., 2010; Maher, 1981; Martin et al., 2007; Oliver, 1991; Spencer & Gomez, 2011). Under this macro perspective, it was recognized that legal and regulatory structures tended to reflect a country's social and legal norms (Bahoo et al., 2020). These norms influence the relationship between the firm and its external environment.

Similarly, business ethics literature has focused on a few macro-level factors such as the provisions of the FCPA, its effectiveness, and how it has been replicated or implemented in other countries (Brooks, 1997; Cleveland et al., 2009; Geo-JaJa & Mangum, 2000; Shaw, 1988; Weismann et al., 2014). This literature has also demonstrated several country-level factors that increase the likelihood of bribery. These factors include characteristics of the MNE's home country. FCPA violations were more likely when the MNE's home country was more tolerant of bribery, the home country was not a signatory to the OECD convention against corruption, the home country had a higher power distance culture, and the MNE paid bribes in less developed countries (Baughn et al., 2010). Also, when MNE headquarters were located in countries that were more corrupt, the MNE was likely to have already

paid bribes and been the subject of FCPA investigations (Dass et al., 2021). Studies have also shown why credible law enforcement and stronger and effective internal controls are needed to combat corruption that leads to FCPA violations (Darrough, 2010).

The macro focus contrasts with a more micro-level focus that could examine the relationship between the firm and its employees. This focus concentrates on the firm looking inward. As illustrated by the analysis reported in this article, the micro-level inward-looking perspective has been largely overlooked by the FCPA literature. However, many sound theories could be used by micro-level researchers to provide new insights into the FCPA. Research on the relationships between firms and their employees can provide useful insight into how to control the kind of corruption that leads to violations of the FCPA. Specific examples are provided later in this article.

MACRO-LEVEL INSTITUTIONAL VS. MICRO-LEVEL INDIVIDUAL RESEARCH

Several studies have adopted the institutional macro-level approach to examine the FCPA. For each, the possibility of research that examines a more inward-looking approach is suggested. For example, adopting a stakeholder theory perspective on corporate governance, Maher (1981) found that firms' response to regulatory controls under the FCPA tended to increase expenditures to primarily emphasize proof of compliance with the law and much less emphasis on directly influencing internal accounting controls. This suggests that firms may be more focused on the external perception of legitimacy instead of actual compliance. Actual compliance with the FCPA may be more effectively achieved through the implementation of empirically validated internal practices and controls.

Badua (2015) adopted a transaction cost economics theoretical perspective to study how the public scandals caused by firms' disclosed bribery can have several society-level outcomes. In addition, using an investor-attention theoretical perspective, the truly high reputational costs of FCPA bribery scandals to firms were examined (Sampath et al., 2018). Some firms may risk reputational losses by engaging in bribery to achieve financial goals. Nevertheless, bribery can be a less than optimal strategy because the payee makes no legal guarantee to follow through with the promised or expected favors for the payor. Instead, if firms were to spend resources on internal practices designed to prevent bribery, the firm itself could follow through to ensure compliance. Thus, internal controls could be more effective than bribery.

Hess and Kossack (1981) used a behavioral theory of the firm perspective and found that for many MNEs, confidential side payments were the least risky approach to meet the demands for bribery in foreign countries. However, more inward-looking solutions based on behavioral ethics theories could be a better way to prevent bribery (Pastin & Hooker, 1980).

Balachandran and Ramakrishnan (1980), using an agency theory perspective, identified possible problems with using audits to control bribery because the auditor was faced with a dilemma. The audit should present the true state of affairs, but the firm also wants the audit to be favorable to the firm. Nevertheless, auditors do charge higher fees in situations where the risk of FCPA violations is higher (Lyon & Maher, 2005). Thus, accounting controls and audits may not be the panacea for preventing FCPA violations. Instead, firms could consider a more direct observation of employee performance to increase confidence in controls.

Unfortunately, very little micro-level, inward-looking, theory-based empirical research on the causes of FCPA violations has been done, and even less on what organizations can do to prevent them. The structured analysis in this study suggests that scholars have tended to concentrate within research silos that focus on legal and policy-level questions. This research silo problem impairs the growth of knowledge that could provide innovative insights and breakthrough solutions (Abrahamson, 1991; Kuhn, 1962; Lindgreen et al., 2020). The lack of theory-based and evidence-based scholarly research is

regrettable since organizational research has provided a plethora of insights that could be used to understand, predict, and prevent the risks of bribery that violate the FCPA. This research could also provide a deeper understanding of how and why some methods of detecting, preventing, or controlling these behaviors could be effective.

Although largely ignored by the existing FCPA literature, these research streams could be integrated with theory-based and evidence-based studies. Examples of overlooked organizational research streams that could be very helpful include change management (Stouten et al., 2018), corporate culture (Schein, 2019), country culture (Hofstede, 1997; House et al., 2004), high compliance work systems (Posthuma, 2021), performance management (Posthuma et al., 2018), and training program design and effectiveness (Arthur et al., 2003). These and other examples of theoretical foundations for future research are elaborated in the section below.

LEGAL INSTITUTIONS VS. BUSINESS RESEARCH

Legal journals also have extensive research focusing on institutions (e.g., George et al., 2000; Pines, 1994). Nevertheless, despite the increased importance of the FCPA, the number of theory-based business publications has lagged behind the growth in sanctions. Figure 2 illustrates the number of FCPA business-related publications and the number of citations to FCPA business-related research each year from 2010 to 2020. Citations have increased from 88 to 231, indicating an increased interest in this topic. The slight dip in citations from 2012 to 2015 may reflect that there was somewhat waning interest during these years. Possible reasons for varying interests in this topic could be shifting sociological or psychological forces of research fads and fashions (Abrahamson, 1991). Nevertheless, the growth in citations is much smaller than the growth in sanctions. Moreover, the number of business-related publications has remained low and not kept pace with the increasing risk of sanctions. As a result, a gap between the real-world business need for scholarly knowledge on this topic and academic research has arisen. This study helps close this gap by summarizing the existing structure of business research on the FCPA, identifying gaps in this literature, and suggesting insightful future research directions.

THE RATIONALE FOR A STRUCTURED ANALYSIS OF THE RESEARCH LITERATURE

A comprehensive analysis was needed to objectively examine the structure of the research literature on the FCPA and identify critical gaps. Structured analyses are a type of scientific examination of publications that fall within the field of scientometrics. They typically include citation and publication analysis, but this structured review goes further, using maps to present spatial representations of scientific fields of inquiry (Piotrowski, 2019). Structured analyses can display the knowledge structure in several ways: publications, authors, journals, and keywords (Bayer et al., 1990; Beaver, 2001). Since structured techniques use mathematical algorithms, they are objective, inclusive, and a helpful supplement to conceptual literature reviews (Krampen et al., 2011; Vladutz & Cook, 1984). Moreover, the popularity of structured analysis is increasing as the acceptance of this analytic technique continues to flourish. Also, Scopus and Web of Science offer easier access to scholarly databases, which enable literature searches through online digital sources (Cancino et al., 2017). Recent demonstrations of the usefulness of structured analyses include the mapping of the intellectual structure of research on corporate social responsibility (Ji et al., 2021), ethics education (Poje & Groff, 2021), and social entrepreneurship (Hota et al., 2020).

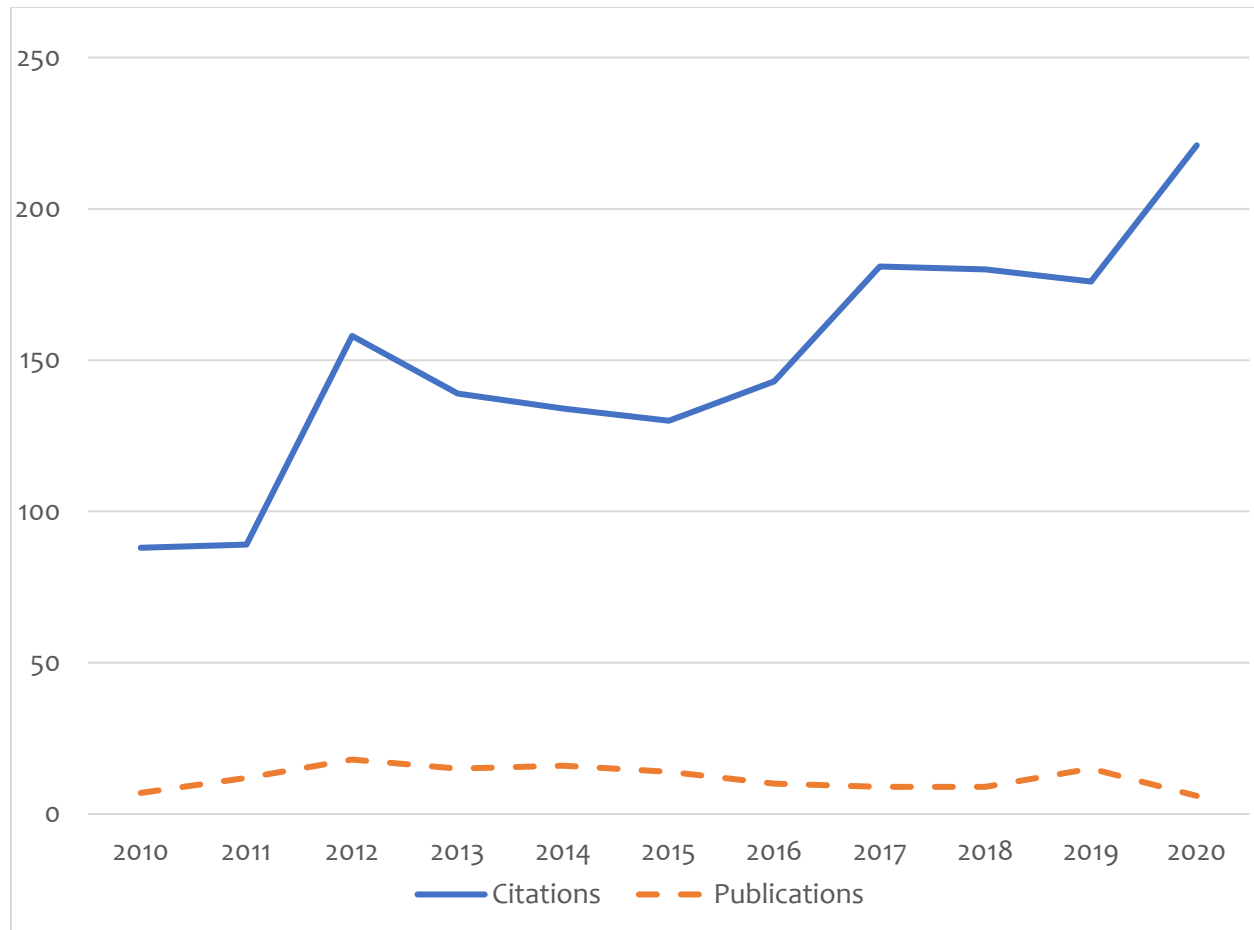


Figure 2. Business Research Publications and Citations Regarding the FCPA from 2010 to 2020

Moreover, research has too often congealed into separate functional silos (Sinkovics & Reuber, 2021). As illustrated by the structured analysis conducted here, much of the research on the FCPA has tended to fall into academic silos that focus on public policy debates about the effectiveness and propriety of the FCPA (Hotchkiss, 1998), or general broad-based analyses of international issues.

In addition, numerous firms have adopted Anti-Bribery and Anti-Corruption (ABAC) compliance programs designed to detect and prevent many types of corruption, including violations of the FCPA but also other things like money laundering, tax evasion, and wire fraud (PWC, 2022).³ Published research on these programs also has tended to focus on legal and policy issues. Integrating FCPA research with the many streams of organizational scholarship will provide more profound insight into how MNEs can manage their ABAC compliance functions more effectively. The current deficiency of research on the FCPA within these fields leaves scholars unable to provide sound advice to MNEs, who are then left vulnerable to pressures to adopt ABAC solutions that could be fads that are superficially attractive, yet empirically unproven (Abrahamson, 1991; Kostova & Roth, 2002).

³ Anti-Bribery and Anti-Corruption (ABAC) programs are designed to monitor, detect, and prevent illegal conduct by employees or third-party contractors. They often include sophisticated accounting information systems that focus on financial transactions.

METHODS

This study used two structured analytical approaches. The first approach is performance mapping, which quantifies research productivity through rankings of articles, journals, countries, academic fields, and publications (Van Raan, 2014). Performance mapping is becoming an increasingly popular research tool in several areas, including business (Boiko, 2021), engineering (Tamala et al., 2022), and medicine (Kumar et al., 2022). Performance mapping complements qualitative literature reviews, which could be subject to bias or lack of rigor, by providing an objective quantitative analysis that measures the performance of individuals and journals (Cobo et al., 2011; Zhang et al., 2021). To conduct a performance analysis of business-related FCPA research, rankings of journals, countries, academic fields, and articles were conducted (Tables 1 and 2).

The second approach is science mapping, which examines intellectual relationships and the conceptual structure of a research field (Verbeek et al., 2002; Zupic & Čater, 2015). Science mapping is often done using co-citation and citation analyses. Co-citation analysis identifies two articles as similar because they were both cited by another article. Journal citations are mapped to illustrate clusters of journals that tend to cite each other. Keyword co-occurrences are mapped to identify conceptual clusters. The resulting maps have nodes that represent authors, journals, and keywords. Closer distances between two nodes represent greater relatedness, and the most related nodes are connected by lines (van Eck & Waltman, 2018). A citation analysis groups journals into identifiable clusters that tend to cite each other.

Using the Web of Science, a search for research-related literature from business, social science, and related publications on the FCPA was conducted in April 2021. This database was used since the study focuses on business-related and not law-related publications. The specifications of this search were as follows, Topic: ("foreign corrupt practices act"), Timespan: all years, and Indexes: SCI-EXPANDED, SSCI, A & HCI, CPCI-S, CPCI-SSH, BKCI-S, BKCI-SSH, ESCI, CCR-EXPANDED, IC.

Each of the identified publications was examined to ensure that it focused on business-related research on the FCPA. The initial search resulted in 235 publications. One was eliminated because it only tangentially mentioned the FCPA. The remaining studies included 194 articles, 11 paper proceedings, six book chapters, six editorials, five early access articles, five reviews, two book reviews, two discussions, two letters, and one research note. The overall H-index of these studies was 16, average citations per item = 5.68, times cited = 1,330, and citing articles = 847.

Table 1. Ranked Frequencies of Business-Related Studies on the FCPA: Journals, Countries, and Academic Fields

Journal Names			Countries			Academic Fields		
	#	%		#	%		#	%
American Criminal L. Rev.	32	24.8%	US	150	82.4%	Law	152	53.7%
Securities Reg. L. Rev.	12	9.3%	UK	7	3.8%	Business	41	14.5%
J. of Business Ethics	11	8.5%	Canada	5	2.7%	Business Finance	18	6.4%
Business Lawyer	7	5.4%	Australia	3	1.6%	International Relations	16	5.7%
U. of Illinois L. Rev.	6	4.7%	China	2	1.1%	Ethics	14	4.9%
American Business L. J.	5	3.9%	France	2	1.1%	Management	13	4.6%
Cornell Int'l. L. J.	5	3.9%	Netherlands	2	1.1%	Economics	11	3.9%
J. of Corp, Accounting & Fn.	4	3.1%	South Africa	2	1.1%	Criminology Penology	8	2.8%
J. of Crim. L. & Criminology	4	3.1%	Argentina	1	0.5%	Political Science	6	2.1%
Wisconsin L. Rev.	4	3.1%	Belgium	1	0.5%	Social Issues	4	1.4%
Business Horizons	3	2.3%	Brazil	1	0.5%			
Col. J. of Law & Soc. Probs.	3	2.3%	Germany	1	0.5%			
Col. J. of Transnational L	3	2.3%	Israel	1	0.5%			
Columbia L. Rev.	3	2.3%	Latvia	1	0.5%			
Duke L. J.	3	2.3%	Romania	1	0.5%			
Fordham L. Rev.	3	2.3%	South Korea	1	0.5%			
Harvard Business Rev.	3	2.3%	UAE.	1	0.5%			
Harvard J. on Legis.	3	2.3%						
J. of Int'l. Business Studies	3	2.3%						
Accounting Review	2	1.6%						
Auditing - J. Prac. & Theory	2	1.6%						
Corruption Enemy Within	2	1.6%						
European Pol. Science	2	1.6%						
Iowa L. Rev.	2	1.6%						
J. Int'l. L & Economics	2	1.6%						

Note: Each column is a unique ranking, e.g., journal names do not match with countries. Small frequencies were excluded (less than 2 for journals, less than 4 for academic fields). # = number of publications and % = percentage for each category within articles published on the FCPA.

Three performance analyses were conducted. The first analysis, see Table 1, shows a ranking of journals, countries, and academic fields publishing on the FCPA. The second analysis, see Figure 2 above, summarized the number of business-related research publications and citations. The third analysis, see Table 2 below, ranks the ten most frequently cited publications.

RESULTS

The data in Table 1 were obtained from the search of the Web of Science database of publications. The columns in this table are independent. The Web of Science database provided the categories of countries and academic fields.

The first column in this table ranks the frequencies and percentages of articles published in different journals. This table shows that several legal publications were included in this ranking even though the search focused on business journals. The *American Criminal Law Review* topped this list with the highest number of publications, $n = 32$ (24.8% of the total). However, journals that are more commonly used as outlets for business-related research also appeared in this ranking: *Journal of Business Ethics* ($n = 11$, 8.5%), *Business Horizons* ($n = 3$, 2.3%), *Harvard Business Review* ($n = 3$, 2.3%), *Journal of International Business Studies* ($n = 3$, 2.3%), and *Accounting Review* ($n = 2$, 1.6%). These results suggest that legal scholars have been more prolific in writing about the FCPA than business scholars and that a gap exists in business-related research on the FCPA.

The second column in Table 1 shows the ranked frequencies of the country of origin of the scholars writing on the FCPA. Most of the published articles ($n = 150$, 82.4%) originated from the US. This is not surprising since the FCPA is a US federal statute. However, much of the illegal conduct that is sanctioned under the FCPA occurs in other countries (Stanford Foreign Corrupt Practices Act Clearinghouse, 2021). This suggests a relative lack of research originating outside of the US. This gap can be filled by studies conducted by scholars from other countries, especially countries where the kind of corruption that leads to FCPA violations frequently occurs.

The third column in Table 1 shows the ranked frequencies of the academic fields. Law dominated the academic field ranking having the majority of publications ($n = 152$, 53.7%). However, several business-related fields also had significant numbers of publications: business ($n = 41$, 14.5%), business finance ($n = 18$, 6.4%), ethics ($n = 14$, 4.9%), management ($n = 13$, 4.6%), and economics ($n = 11$, 3.9%). However, when all of these business-related categories are combined, they make up significantly less than half of the total publications ($n = 97$, 34.3%). This suggests a gap in FCPA research that can be filled by more studies in the fields of accounting, business, economics, ethics, finance, and management.

Table 2 ranks articles on the FCPA that were the most commonly cited in business research journals in recent years (2017 to 2021) and all years. Table 2 is useful for business scholars because it compares the importance of each FCPA publication within the group of other business-related publications on the FCPA. It indicates the relative impact of each publication compared to the frequency of expected citations in the field of business research on the FCPA (Martin, 1996; Verbeek et al., 2002). This also can suggest fruitful trends within the field of this business research. This comparison is more relevant for FCPA researchers than comparing each FCPA publication to business-related publications on other topics or comparing them to law-related publications. Also, the data in Table 2 enable the reader to determine which publications had the greatest long-term versus short-term impact (Moed et al., 1985). This helps identify articles that have gained more traction because they have been cited far longer than those that have not generated a longer-term research stream.

Table 2. Ten Most Cited Business Research Publications on the FCPA

Articles	Year of Citation					All Years	Cites Per Year
	2017	2018	2019	2020	2021		
Stevens, B. (1994). An analysis of corporate ethical code studies – Where do we go from here? <i>Journal of Business Ethics</i> , 13(1), 63-69.	7	6	8	4	1	122	4.36
Cuervo-Cazurra, A. (2008). The effectiveness of laws against bribery abroad. <i>Journal of International Business Studies</i> , 39(4), 634-651.	9	14	10	9	6	100	7.14
Lyon, J. D. & Maher, M. W. (2005). The importance of business risk in setting audit fees: Evidence from cases of client misconduct. <i>Journal of Accounting Research</i> , 43(1), 133-151.	6	10	13	26	3	88	5.18
George, B. C., Lacey, K. A., & Birmele, J. (2000). The 1998 OECD Convention: An impetus for worldwide changes in attitudes toward corruption in business transactions. <i>American Business Law Journal</i> , 37(3), 485-525.	2	3	2	0	0	45	2.05
Cleveland, M., Favo, C. M., Freckle, T. J., & Owens, C. L. (2009). Trends in the international fight against bribery and corruption. <i>Journal of Business Ethics</i> , 90(2), 199-244.	7	3	1	7	2	39	3.00
Pines, D. (1994). Amending the Foreign Corrupt Practices Act to include a private right of action. <i>California Law Review</i> , 82(1), 185-229.	2	1	0	2	0	35	1.25
Hotchkiss, C. (1998). The sleeping dog stirs: New signs of life in efforts to end corruption in international business. <i>Journal of Public Policy & Marketing</i> , 17(1), 108-115.	3	0	0	1	0	33	1.38
Shapiro, B., & Matson, D. (2008). Strategies of resistance to internal control regulation. <i>Accounting Organizations and Society</i> , 33(2-3), 199-228.	2	4	2	5	0	32	2.29
Kaikati, J. G., Sullivan, G. M., Virgo, J. M., et al., (2000). The price of international business morality: Twenty years under the Foreign Corrupt Practices Act. <i>Journal of Business Ethics</i> , 26(3), 213-222.	2	2	1	1	0	31	1.41
Weismann, M. F. (2009). The Foreign Corrupt Practices Act: The failure of the self-regulatory model of corporate governance in the global business environment. <i>Journal of Business Ethics</i> , 88(3), 615-661.	1	3	3	2	0	27	2.08

Table 2 also shows citations of each article in the most recent five years, total number of citations, and the number of citations per year. Four of the most often cited articles appeared in the *Journal of Business Ethics* (Cleveland et al., 2009; Kaikati et al., 2000; Stevens, 1994; Weismann, 2009). Other articles frequently cited in the business research literature included two articles in accounting journals (Lyon & Maher, 2005; Shapiro & Mason, 2008), two articles in legal journals (George et al., 2000; Pines, 1994), one in international business (Cuervo-Cazurra, 2008), and one in marketing (Hotchkiss, 1998). Scholars new to FCPA research can carefully consider the articles with the greatest relative and most long-term impact and most recent publications. This enables them to identify trends and gaps where innovative insights could take the field in new and unexplored directions.

Notably absent from this list are articles from academic fields that could significantly contribute to the FCPA literature. These fields have well-developed theories and strong conceptual foundations. This gap in the FCPA literature could be filled by organizational scholars who could apply, extend, and revise theories to provide new insights for FCPA research.

The research gap can be partially explained from an institutional perspective. The research literature on the FCPA can be viewed as a social institution within which scholars cite each other, investigate important topics, and publish results. Forces such as social norms and mimetic isomorphism influence this social institution (DiMaggio & Powell, 1983; Powell & DiMaggio, 2012). Moreover, these institutional forces cause the clustering of authors, journals, and research topics as scholars conform to perceptions of legitimate or acceptable research. The following structured mapping of this research literature tended to confirm this.

CLUSTERS OF AUTHOR CO-CITATIONS

Figure 3 is a map created using VosViewer by choosing a co-citation map of cited authors, using full counting, with authors with a minimum of 10 citations. One hundred and seventeen authors met this threshold. The nodes represent the authors of each publication, and the lines between authors indicate co-citations. Larger nodes indicate a greater degree of connectedness to other publications. For example, Koehler (2012a) has many co-citations with other works. The map shows that the authors fell into three general clusters. Each cluster is encircled with a boundary line and displayed in different colors. The captions indicate the main themes of the authors' research in each cluster.

The co-citations illustrated in Red Cluster 1 indicate a moderately dense interconnected network of authors working on broad-scope issues such as international and transnational topics, including the OECD Anti-bribery Convention (Pieth et al., 2007), other regional conventions against corruption (Low et al., 1997), global markets (Salbu, 1997), and the extraterritorial application of the FCPA (Salbu, 1999). Others have focused on contextual issues in countries or regions outside of the US, such as oil and gas in Africa (Deming, 2011), working with outside counsel in the Asia-Pacific region (Impert, 1985), and corruption in Mexico (Low, 2003). These scholars have tended to publish in legal-oriented journals and generally provide overviews of cross-national legal issues.

The co-citations illustrated in Green Cluster 2 indicate a moderately dense interconnected network of authors. This cluster includes critiques of how the FCPA has been and should be enforced. These are primarily legal scholars. The types of publications include overviews of the legislative history and purposes of the FCPA (Koehler, 2012a), calls for more consistent application of pre-existing good faith efforts to comply with the FCPA (Koehler, 2012b), and a critique of the lack of judicial oversight of FCPA enforcement (Koehler, 2009). To a large extent, the target audience for this type of publication includes prosecutors, judges, and legislators who legal arguments could influence.

The co-citations illustrated in Blue Cluster 3 indicate a rather loosely connected gathering of authors. This cluster is not as dense as the other two clusters. This suggests that research by the authors in this cluster is not as well interconnected as research in the other clusters. Authors in this cluster often focused on practitioner-oriented advice based on observations of specific cases. These studies focused on diverse applied issues for firms and their advisors. For example, publications in this cluster focused on disputes about the definition of who was a covered foreign official (Brown, 2016), responsibilities of corporate directors and officers (Brown, 2001; Huskins, 2008), the allocation of liabilities between parent companies and their subsidiaries (Brown, 1998), and the risks of private litigation (Huskins, 2008). Also included are frequent citations of online websites and blogs that discuss recent FCPA cases (e.g., Cassin, 2010).

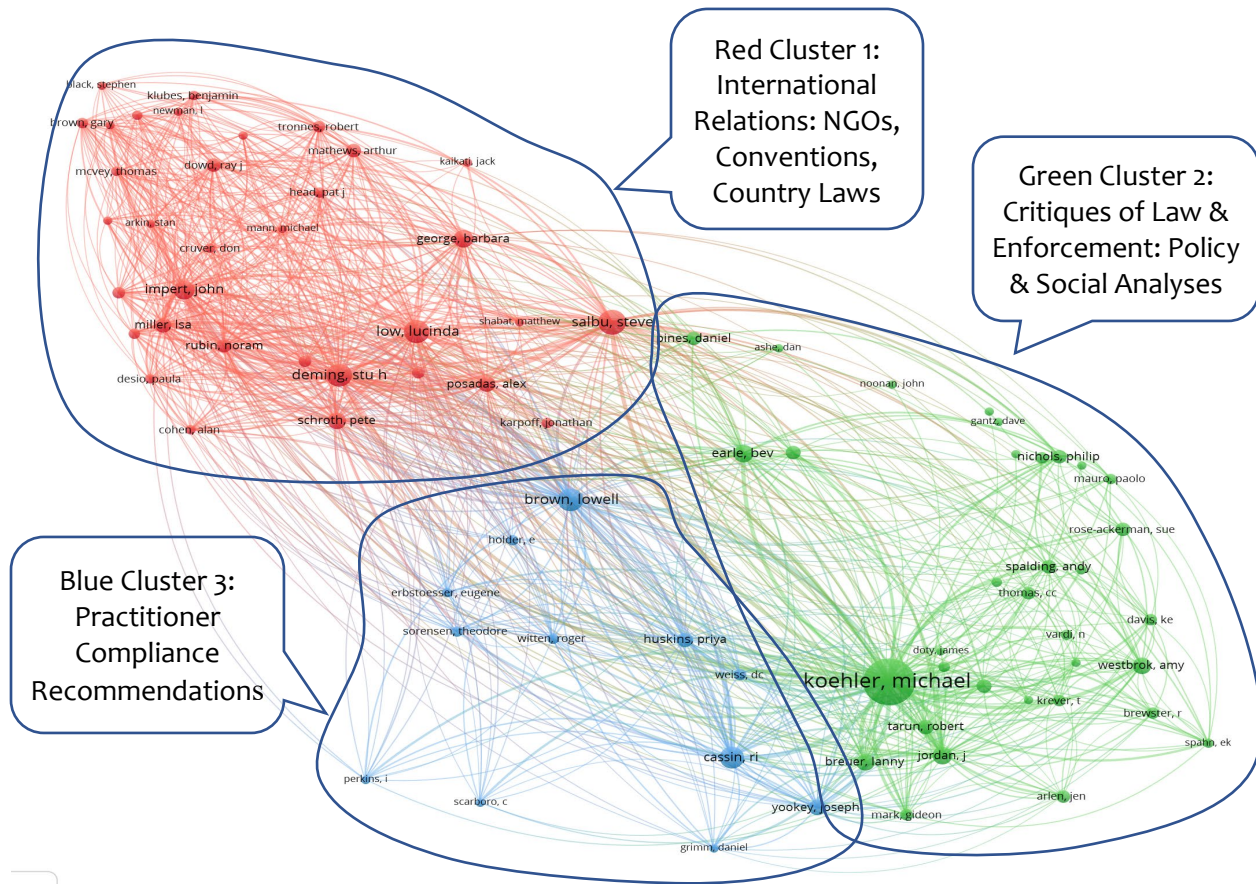


Figure 3. Clusters of Scholars and Their Research Focus

In this cluster of co-citations of authors that focus on practice or applied issues, few studies are based on sound theory and empirical validation. Future research could build a theory-based and orderly body of knowledge. The result would be a more densely interconnected network of co-citations as scholars cite, validate, and build upon each other's insights.

Figure 4 shows clusters of journal co-citations. The nodes represent the names of journals, and the lines indicate citations between journals. Larger nodes indicate a greater degree of connectedness to other journals. For example, the Journal of Business Ethics is a centrally located and larger node within the cluster of business journals (Blue Cluster 4). The map also shows that journals fall into four general clusters. The captions indicate the main themes of the research in each cluster. Each of these clusters has focal areas that help explain why the publications in these journals tend to cite each other.

Green Cluster 1 represents journals that focus on advice for MNEs on how to comply with the FCPA and how to do so in different countries and contexts. These include articles that describe the importance of global compliance programs (Winer, 1999), how to reduce the cost of sanctions under the FCPA by establishing proof of good faith compliance (Salbu, 2018), and the need for bi-cultural attorneys that understand both the FCPA and local laws in China (Erie, 2019). This cluster represents a closely intertwined set of articles.

Red Cluster 2 represents the co-citations of journals that tend to focus more on the governmental level and legislative policy issues. These include, for example, articles that examine the purposes and provisions of the FCPA (Gleich & Woodward, 2005), discuss possible amendments to the FCPA to enable it to achieve its policy objectives (Larson, 1980), and analyze the fairness of FCPA enforcement against US and foreign firms (Shnitser, 2010). This cluster represents a closely and densely connected set of journals. However, the focus of these articles generally tends toward policy-level thinking rather than a deeper understanding of how firms can successfully achieve compliance.

Yellow Cluster 3 represents the co-citations of journals that select specific topics such as the morality of the FCPA, relationship to Sarbanes Oxley, territoriality issues, and statistics on the FCPA. This included a recent article that provided data on the FCPA (Koehler, 2020).

Blue Cluster 4 characterizes the co-citations of business journals addressing business ethics, accounting, and related fields. These include articles that identify factors likely to increase the risk of FCPA violations (Baughn et al., 2010) and also provide advice about how to avoid the risk of FCPA violations (Cleveland et al., 2009). It also includes analyses of whether the FCPA has reduced US company export performance (Graham, 1984) or reduced foreign direct investments in countries that have greater corruption (Cuervo-Cazurra, 2006).

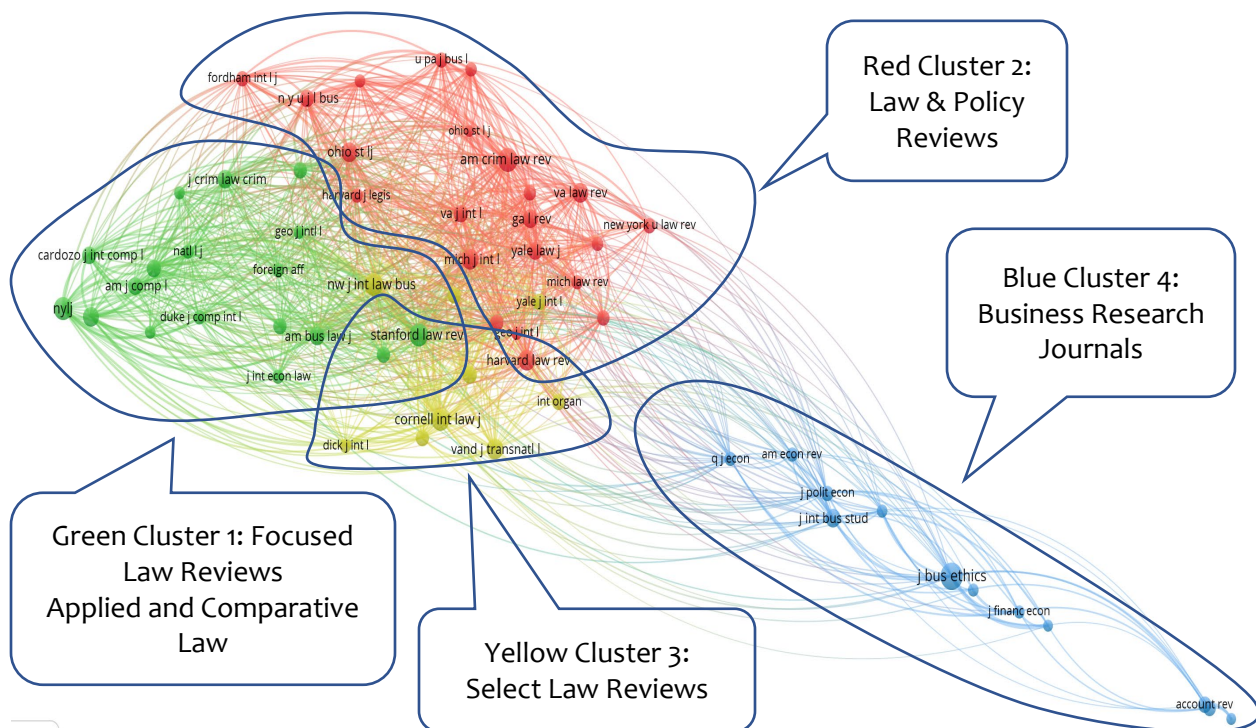


Figure 4. Clusters of Journals Publishing Business Related Research on the Foreign Corrupt Practices Act

Unfortunately, Blue Cluster 4 is comparatively sparse and not well developed since there are fewer interconnections between business journals. This suggests weaker development of the nomological network of ideas and insights on the FCPA within and among business journals. Future research could also help to fill gaps between Blue Cluster 4 and the rest of the FCPA literature.

Figure 5 shows clusters of author-supplied keyword co-citations. The nodes represent keywords from FCPA articles, and the lines indicate co-citations between articles with the same keywords. Larger nodes indicate a greater degree of connectedness to other keywords.

For example, the US FCPA and bribery are two centrally located keywords with larger nodes. Around them are six clusters of keywords. Captions indicate the main themes of the research of keywords in each cluster.

Red Cluster 1 represents keywords dealing with international relations issues. These include the application of the FCPA, a US federal law outside of the US, also known as extraterritoriality (Salbu, 1999). It also includes various conventions between countries that have agreed to follow general anti-corruption principles and enact and enforce laws in their own countries similar to the FCPA (George et al., 2000).

Aqua Cluster 2 represents keywords that focus on business outcomes related to the markets in which MNEs operate. These include, for example, the definitions of and different degrees of corruption in foreign markets (de la Torre, 2016; Singh, 1997), financial disclosures (Jaeschke et al., 2018), and corruption in specific industries (Dodds, 2015).

Yellow Cluster 3 denotes keywords that focus on accounting and auditing issues. These include the effectiveness of internal accounting controls across countries (Shapiro & Matson, 2008, Siedel, 1981) and auditing issues such as how auditing may be more challenging in countries with higher FCPA risks (Colón & Bladuel, 2014). It also includes research on higher audit fees where the risks of FCPA violations are greater (Lyon & Maher, 2005). Finally, it includes research on how auditing is influenced by a contagion effect when a peer firm of one of the auditor's clients has been involved with FCPA matters, i.e., a risk-based contagion (Lawson et al., 2019).

Orange Cluster 4 represents keywords that focus on corporate self-governance and global deployment of ethical standards across countries. Studies using these keywords concentrate on topics that include, for example, voluntary self-regulation (Cragg, 2005), corporate codes of conduct and ethics (Stevens, 1994), and the challenges of complying with the FCPA requirements within MNEs (Weismann, 2009).

Green Cluster 5 represents keywords that focus on company cultures, country cultures, social norms, and business ethics. These include studies that highlight how company cultures can influence the risk of FCPA violations (Hunter et al., 2011), and how the benefits of creating a compliance culture inside an organization may conflict with self-disclosing violations to government investigators (Yockey, 2012). Other studies show how different country cultures influence the propensity to engage in corrupt bribery (Sanyal & Guvenil, 2009), and how universalistic cultural norms against corruption that are a foundation for the FCPA may conflict with concepts of cultural pluralism and diverse understandings of morality in different countries (Dalton, 2005).

Blue Cluster 6 represents keywords that focus on international business corruption, a well-developed literature in international business research. However, it tends to focus mainly on the definitions and causes of global business corruption rather than analyzing the mechanisms through which it can be managed. Studies in this area include investigations of foreign direct investments and the Bribe Payers Index (Sanyal & Samanta, 2011), anti-bribery laws in countries outside the US (Alldridge, 2012), and how avoiding corruption is part of corporate social responsibility (Sweetbaum, 2008).

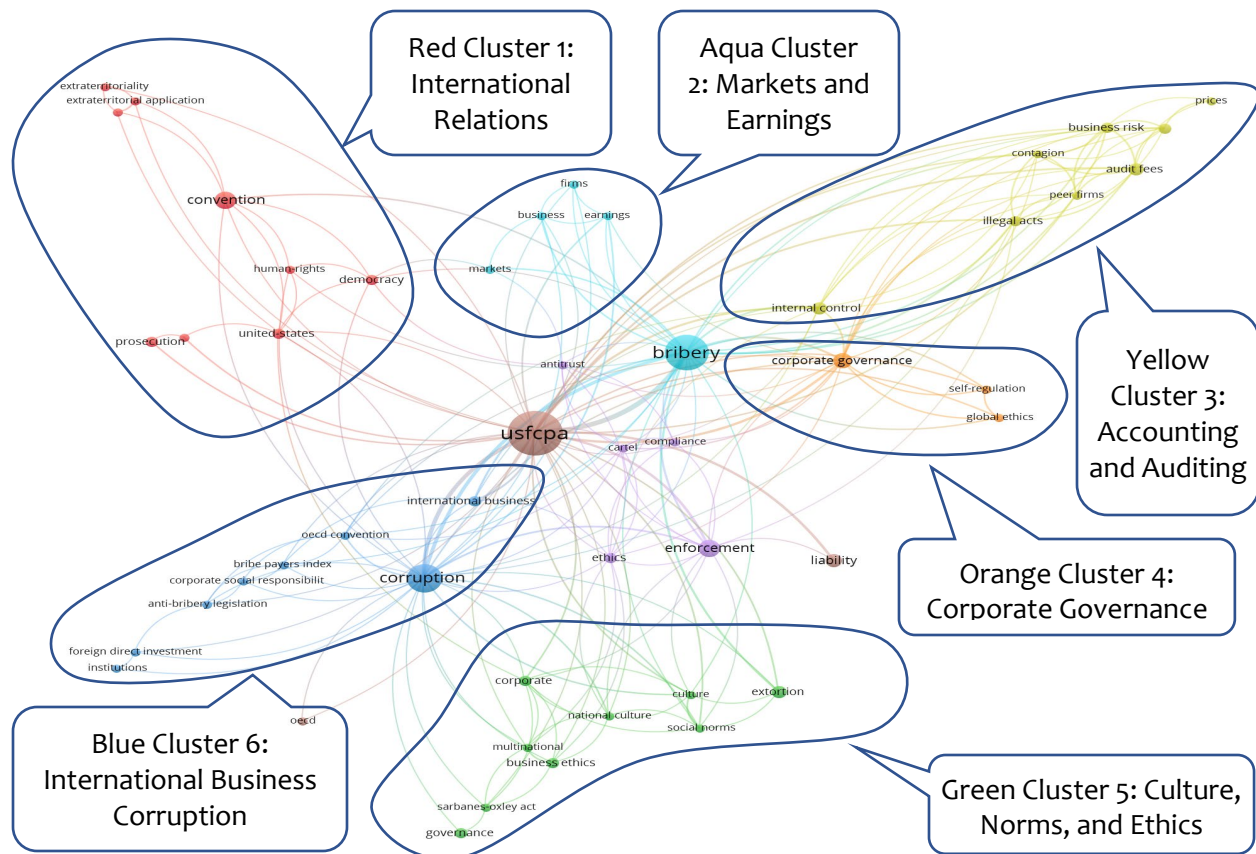


Figure 5. Clusters of Co-Occurrence of Keywords

THEORETICAL FOUNDATIONS FOR FUTURE RESEARCH ON MANAGING FCPA RISKS

Several theoretical foundations could facilitate an enhanced understanding of the predictors and processes involved in FCPA infractions. Many cases involving FCPA violations have demonstrated the importance of micro-level research because it is often the behavior of small numbers of individuals who are engaged in illegal activities (Furnham & Taylor, 2011). Unlike most prior research conducted at the macro or institutional level (e.g., Cuervo-Cazurra, 2016), an alternative perspective suggests the need for micro-level analysis focused on the behavior of individuals.

For example, valuable perspectives include how ethical concepts and theories such as cultural relativism, legalism, moralism, pragmatism, and rational choice (Longenecker et al., 1988; Sampath et al., 1988) moderate the effective implementation of compliance programs. More careful analysis is needed on factors that influence the effectiveness of corporate codes of conduct on FCPA violations by individuals (Stevens, 1994; Weber & Wasieleski, 2013).

Micro-level research should focus on the concepts and theories that can help explain what causes people to engage in corrupt behavior that leads to FCPA violations; and how these insights can help to reduce violations. Table 3 lists and summarizes theories and concepts at different levels (individuals, individuals within firms, and firms) and suggests future research directions for each.

Table 3. Theories and Concepts for Future Research on the FCPA

Theories & Concepts	Relationship to the FCPA	Proposed Future Research
Individual Level		
Bounded Ethicality Theory	Like the concept of bounded rationality, which proposes that people have limits to their rationality, bounded ethicality theory proposes that people have limits to their ethicality (Gino et al., 2008; McCarthy et al., 2012).	Future research should examine whether, how, and why the limits of individual ethicality can be increased and expanded as firms adopt ABAC programs and as more countries adopt laws to prohibit bribery.
Conformity Bias	Research on conformity bias suggests that employees make choices about the ethics of questionable conduct based on behavioral cues they receive from others (e.g., seeing others bribe and get away with it) instead of using their own standards (Greppin et al., 2020; Moscovici & Faucheux, 1972).	Future research should examine how organizations can use behavioral cues to increase individual-level ethicality. This could include examining the effectiveness of different types of modeling ethical behaviors in ethics compliance training, and leaders modeling ethical behaviors.
Moral Disengagement Theory	Research on moral disengagement has suggested that employees dampen their ethical judgments when they experience a psychological need to achieve organizational objectives (Greppin et al., 2020; Moore, 2008).	Future research should examine ways organizations can prevent moral disengagement or activate a countervailing moral engagement in situations related to the FCPA. For example, performance goals could be integrated with ethical performance goals (Posthuma & Campion, 2008).
Moral Identity Theory	Employees can be told to avoid unethical behavior, but employees who identify themselves as moral persons are less likely to engage in unethical behavior (Aquino & Reed, 2002).	Future research should evaluate the effectiveness of recruiting, hiring, and promotion systems to increase the number of employees with high moral identities and whether this reduces corruption.
Moral Muteness Theory	Research on moral muteness recognizes that business executives are reluctant to communicate about issues related to business ethics openly. Moral muteness causes several negative outcomes, such as thinking that business activity is always amoral, failing to learn from past ethical lapses (i.e., moral amnesia), and having narrow conceptions of business morality, moral stress, etc. (Aguilera & Vadera, 2008; Bird & Waters, 1989).	Research should focus on understanding effective methods to overcome moral muteness by encouraging open and appropriate discussions of ethical issues (e.g., speaking up initiatives, Posthuma, 2021).

Obedience to Authority

Research on obedience to authority suggests that employees will engage in corrupt behaviors to gain the approval of authority figures (Aguilera & Vadera, 2008). This is more likely to occur in cultures with greater acceptance of power distance, where employees will be more willing to engage in corruption if they believe the results would please their superiors. However, research suggests that if companies require strict performance standards, then employees may comply with company ethical standards, even in high power distance cultures (Cheng & Cascio, 2009).

Future research should examine whether this finding extends to performance standards that include strict enforcement of ABAC programs and ethical compliance that have been approved by authority figures in countries with higher power distance. This is important because countries with higher power distance also tend to have more FCPA violations.

Situationism Theory

Research on situationism suggests that employees engage in corrupt behaviors such as bribery because they think that the circumstances in which they find themselves, realistically, give them no other choice, and the situation overrides their ethical predispositions (Greppin et al., 2020; Kamtekar, 2004).

Future research should identify ways that MNEs can adopt systems and processes that ensure that employees in these situations will recognize ethical options because they are aware of them (e.g., case-based pattern recognition training). It can also determine why employees select ethical behaviors because of effective management practices (e.g., ethical performance management and incentives for ethics).

Self-Control Theory

Individuals need to exert self-control to reject the temptations to engage in unethical behavior (Gino et al., 2011). However, their ability to exercise self-control can be depleted by using self-control repeatedly and other factors such as alcohol consumption and sleep deprivation.

Future research should determine if careful scheduling of work activities with ethical implications can help. If these activities are scheduled when employees are well rested, and their self-control resources are not depleted, will this reduce unethical behavior, i.e., ethics-focused performance management (Gino et al., 2011)? Can a high compliance work system enhance self-control, e.g., training and developing employees to recognize and improve their self-control, designing work to reduce temptations, and focused performance monitoring of employees whose resources are depleted (Gino et al., 2011)?

Strain Theory	<p>Research on strain theory has demonstrated that when employees are blocked from obtaining organizationally desired goals, they experience a strain that induces them to engage in unethical and illegal behaviors when those behaviors are socially or culturally accepted and institutionalized within their environment (Burnham et al., 2018; Greve et al., 2010).</p>	<p>Future research should investigate whether firms can reduce strain by adopting effective performance management systems that help employees meet their goals using ethically and legally appropriate methods (Posthuma et al., 2018). Future research should also study how the level of goals, e.g., too high, aggressive, achievable, or low, will affect the choices of (un)ethical behavior.</p>
Individuals Within Firms Level		
Change Management Theory	<p>Prior research suggested that change management concepts can be integrated with FCPA compliance research (White, 2013). Kotter (1995) conducted a program evaluation of an ABAC based on foundational change management concepts, including his 8-step model and Lewin's unfreeze, change, and refreeze 3-step model (Lewin, 1947).</p>	<p>Future research should build on recent and more fully developed change management theorizing (Stouten et al., 2018). Future change management research should study how companies can change their corporate culture after being sanctioned for FCPA violations to avoid future violations. Research should examine whether it is more effective for firms to exert top-down coercive ABAC control or, alternatively, to mobilize energy for increased compliance through spreading change through all areas of the company using careful implementation planning, communication, employee involvement, and honesty (Beer, 2009; Kanter et al., 1992; Stouten et al., 2018).</p>
Compliance Dynamism Theory	<p>The compliance dynamism approach can advance our understanding of how people respond to the multiple laws that regulate their businesses using multiple legal norms. Their responses are then part of an iterative process that changes over time (Wu & van Rooij, 2021). This approach recognizes that there will be cross-over effects from external to internal environments.</p>	<p>This perspective can be integrated into future research with the emerging temporal dynamics approach to organizational psychology to study how the role of time and time dynamics influences the risk of FCPA violations (Griep & Zacher, 2021; Wright & Haggerty, 2005).</p>
Event Systems Theory	<p>The Event Systems Theory perspective is a growing organizational behavior approach that focuses less on individual differences between people and more on the causes and outcomes of events in the workplace (Morgeson et al., 2015).</p>	<p>A useful future application of this approach would focus on the events (before, during, and after) FCPA violations, and then learn from those events to reduce the likelihood of future occurrences.</p>

Frontline Understanding Theory

The frontline understanding approach explicates norms that create fundamental disconnections at the frontlines between government regulators, businesses, and the behavioral responses of employees charged with compliance duties (Li & van Rooij, 2021).

This perspective can help draw connections between prior macro-level outward-looking research with new, more micro-level, and inward-looking analysis. This could include research that studies the understanding of the obligations of frontline employees to implement practices and procedures designed to increase compliance with the FCPA.

Human Resource Information Systems (HRISs), Data Analytics, and ABAC Systems

Increasingly sophisticated HRISs, big data analytics, artificial intelligence, and machine learning programs could assist companies using ABAC systems to comply with the FCPA (Coalition for Integrity, 2021; Galvin & Chen, 2019). They use continuous monitoring and identifying transactions that pose risks of FCPA bribery, fraud, or other misconduct (Chanda, 2021; Taylor, 2009).

Future research should examine the implications of people being falsely red-flagged as a corruption risk by data analytics, e.g., false positives. This topic could be analyzed using concepts such as distributive, procedural, and interactional justice (Posthuma & Campion, 2008). Research can study whether systems that identify the "bad apple" employees engage in future corruption, i.e., are they true positives, and to what extent do their social connections with others at work diminish ethical corporate cultures (Furnham & Taylor, 2011). Future research should examine how to implement ABAC programs across multiple countries where governmental regulations (e.g., European Union data privacy and China disclosure requirements) constrain the implementation of these programs (Galvin & Chen, 2019). Research should also examine if incremental change processes that gradually deploy ABAC data analytics are more or less effective than leapfrog technologies that skip prior generations of software (Chanda, 2021).

High Compliance Work Systems

Research has consistently shown that high-performance work systems can improve organizational performance. More recently, it has also been proposed that high compliance work systems can enhance organizational performance and simultaneously achieve higher compliance with legal constraints such as those imposed by the FCPA (Posthuma, 2021). These systems can be improved if they remind people of the salience of morality, visibility to reduce anonymity that increases peer monitoring, and self-engagement to

Innovative research could analyze the best methods for attracting, recruiting, and hiring employees with predispositions for avoiding moral disengagement and corrupt behaviors. It could also help identify performance management and financial incentives that encourage ethicality. Research can also help design improved training methods that increase employee knowledge of the content of ethics codes. However, it can go further to develop employees' ethical abilities, skills, and motivations to engage in moral behaviors. Research can also identify methods that enhance successful transfer

Moral Licensing Theory	<p>increase individual self-perceptions of their moral identity (Ayal et al., 2015).</p> <p>Moral licensing theory predicts that people who engaged in good behavior in the past, e.g., made donations to non-profits, are more likely to engage in unethical behavior in the future because they have earned a license to do so (Blanken et al., 2015). Similarly, it has been predicted that firms engaged in philanthropy may gain a sense of entitlement to engage in unethical behavior (Bouzzine & Lueg, 2022).</p>	<p>of training to actual ethical work performance (Arthur et al., 2003).</p> <p>Future research should examine whether there is a significant positive relationship between a firm's past philanthropy and future corruption, and what moderates this relationship.</p>
Firm Level	<p>Agents resist threats to their autonomy or survival (Oliver, 1991). Auditors have a dilemma because they want to keep clients, report a true state of affairs (e.g., violations), but also issue a favorable audit (Balachandran & Ramakrishnan, 1980; Maher, 1981).</p>	<p>Future research should examine if agents will resist organizational attempts to control bribery. However, research can also examine how this resistance can be overcome. Can data analytics improve confidence and accuracy of reporting and levels of compliance?</p>
Behavioral Theory of the Firm	<p>Many MNEs will make confidential bribe payments because it is their least risky option to address pressures in some countries (Hess & Kossack, 1981).</p>	<p>Future research should examine if the expense of implementing high compliance work systems is a cost-effective substitute for bribe payments. Will firm philanthropy achieve a moral equilibrium that reduces the perceived need to engage in bribery? How can firms ensure that philanthropy does not become a disguised form of bribery?</p>
Corporate Culture	<p>Company culture can increase corruption and seem to justify it (Berghoff, 2018).</p>	<p>Future research should help to understand how firms build corporate cultures that resist and prevent corruption. How can firms change from a culture that tolerates corruption to one that does not?</p>
Corporate Governance	<p>Although studies showed that the FCPA reduced US foreign direct investment in some countries, overall, US foreign trade was not discouraged by the FCPA. Factors related to FCPA violations were subsidiary control, bribes to reduce taxes, lack of sanctions by top management, operating in competitive industries, and poor financial performance compared to peers (Darrough, 2010; Jensen, 1993).</p>	<p>Future research should study if firms in downward spirals avoid investing in corporate governance because they are already losing to competitors, and the added administration costs would worsen results. How can compliance governance be implemented and maintained? Will an institutionalized, integrated, and mutually reinforcing system be more sustainable than a bricolage of practices?</p>

Institutional Theory	<i>Differences in institutional environments between home and host countries influence business behavior and strategy. When the FCPA is enforced in a host country, US foreign direct investment in that country is reduced (Kostova & Roth, 2002; Jia et al., 2022).</i>	<i>Future research should investigate if some MNEs reduce the threat of FCPA enforcement through lobbying. Can and do firms reduce the risk of FCPA violations through alternative forms of market entry, e.g., exporting or licensing?</i>
Institutional Anomie Theory	<i>Universalism, pecuniary materialism, industrialization, and family breakdown can increase justification for unethical behavior (Cullen et al., 2004).</i>	<i>Future research should investigate if the position of foreign managers in society influences the degree to which institutional anomie factors will increase or decrease corrupt behavior.</i>
Prospect Theory	<i>Firms with higher Research and Development intensity and higher marketing intensity had fewer FCPA violations because they provided employees with ethical ways to meet organizational goals (Burnham et al., 2018).</i>	<i>Future research should examine how firms can design human resource practices for employees to achieve performance success ethically and not just restrict their behaviors, causing anxiety.</i>
Rational Choice Theory	<i>Firms will weigh the benefits, costs, and risks of sanctions and make rational choices about bribery and corruption (Sampath et al., 2018).</i>	<i>Research should study if corporate compliance programs can be designed to be effective and sufficiently efficient so that firms pay for compliance instead of paying the costs of bribery and corruption.</i>
Residual Control Theory	<i>Differences in firms' vulnerability and exposure to corruption influence the ability to walk away from bribe demands (e.g., higher foreign ownership, firm international orientation, state ownership) because of the governmental residual right to control. Pervasive corruption increases and arbitrary corruption reduces bribes (Lee, et al., 2010).</i>	<i>Future research should examine how firms can reduce their vulnerability to corruption; and also study the influence of country-level differences based on pervasiveness, arbitrariness, and legal institutions.</i>
Social Contracts Theory	<i>Weak internal accounting creates opportunities for bribery, thereby allowing firms to violate the implicit social contract they have to act ethically (Donaldson & Dunfee, 1994; Huang, 2016).</i>	<i>Research should examine how Environmental, Social, and Corporate Governance (ESG) and Corporate Social Responsibility (CSR) initiatives can be designed and implemented to reduce FCPA violations. Alternatively, does CSR create a moral licensing effect increasing corruption (Bouzzine & Lueg, 2022)?</i>

Stakeholder Theories	<p>Unlike Friedman (1970), who proposed that the firm's social responsibility is to increase shareholders' profits, stakeholder theories identify other essential parties. The FCPA addresses four crucial factors affecting stakeholder interests: coercion, duty creation, mutuality, and opportunism (Radin, 1999).</p>	<p>Research should examine how governance practices such as accounting controls and human resource management systems can be designed to reduce unethical conduct and address societal stakeholder interests.</p>
Stigmatization Theory	<p>The social stigmatization of bribery scandals reduces company share value, especially when the scandal occurs in less corrupt countries and when managers are involved. Stigma can reduce credit ratings (Sampath et al., 2018).</p>	<p>Research can study whether firms should deploy more compliance resources in corrupt countries with higher risks of FCPA violations or in less corrupt countries where violations are less likely, but losses due to social stigma are greater.</p>
Transaction Cost Economics	<p>Although firms could try to trivialize bribery scandals by focusing on non-essential facts, research suggests that this is unlikely because scandals that affect multiple stakeholder interests and sanctions are expensive (Badua, 2015).</p>	<p>Future research should examine under what conditions firms will attempt to trivialize their own or others' bribery scandals. Do scandals cause significant change within firms? How can the costs of transactions in riskier countries be reduced without increasing the risk of FCPA violations?</p>

CROSS-DISCIPLINARY COLLABORATIVE RESEARCH: LAW AND MANAGEMENT

Much of the legal literature focuses on the potential consequences for individuals, such as fines and incarceration. However, future studies should attempt to integrate and combine the scholarship of management researchers with legal scholars. Doing so will enable legal scholars to inform management researchers and management scholars to inform legal researchers. For example, social psychological concepts can help legal scholars better understand the motivations of those involved in FCPA cases (Rusch, 2016). Also, in the legal field, a Socratic method of questioning and following up answers with more pointed questions is often used in legal education. This same Socratic method could be used as a technique to enhance the effectiveness of corporate investigations and improve the internal self-analysis of corporate compliance programs (Rusch, 2018). Researchers can examine whether the more pointed follow-up questioning helps avoid cover-ups and better identifies FCPA problems early on.

The result should be new and enhanced insights applicable to both fields. This cross-disciplinary research will require overcoming institutional forces (e.g., mimetic pressures, social norms) that encourage scholars to stay within the boundaries of their academic disciplines. However, the large increases in FCPA sanctions against MNEs may be the type of shock to the institutional system of the FCPA research enterprise that could induce this type of significant change (Kuhn, 1962). As a result, more cross-disciplinary law and management research on the FCPA will be undertaken in the future.

CONCLUSION

Given the growing importance of research on the FCPA, this article facilitates future studies among business scholars by providing an important foundational summary of the existing literature. Scholars can build on this groundwork to arrive at new and vital insights. Two methods of structured analysis were used. Performance mapping identified important journals, countries, and academic fields studying the FCPA. Science mapping identified clusters of publications that illustrate groupings of scholars, journals, and research keywords that were likely to result from institutional forces such as mimetic pressures and social norms that have influenced FCPA research.

These analyses demonstrated gaps within and disconnections between much of the legal literature and scholarship in business academic disciplines. Many future theory-based research directions are suggested to fill these gaps and disconnections. These include proposed research on business ethics, change management, high compliance work systems, data analytics systems, and many others. Past research showed a detachment between published scholarship in legal journals and other fields. The growing importance of FCPA sanctions should be the catalyst for future research that includes more cross-disciplinary scholarship that integrates the law and other areas such as business ethics and management disciplines.

Data Availability: The author will make the complete list of publications available upon request.

REFERENCES

- Abrahamson, E. (1991). Managerial Fads and Fashions: The Diffusion and Rejection of Innovations. *Academy of Management Review*, 16, 586-612.
- Aguilera, R. V., & Vadera, A. K. (2008). The Dark Side of Authority: Antecedents, Mechanisms, and Outcomes of Organizational Corruption. *Journal of Business Ethics*, 77(4), 431-449.
- Alldrige, P. (2012). The UK Bribery Act: The Caffeinated Younger Sibling of the FCPA. *Ohio State Law Journal*, 73(5), 1181-1216.
- Aquino, K., & Reed II, A. (2002). The Self-Importance of Moral Identity. *Journal of Personality and Social Psychology*, 83(6), 1423-1440.
- Arthur Jr, W., Bennett Jr, W., Edens, P. S., & Bell, S. T. (2003). Effectiveness of Training in Organizations: A Meta-Analysis of Design and Evaluation Features. *Journal of Applied Psychology*, 88(2), 234-245.
- Ayal, S., Gino, F., Barkan, R., & Ariely, D. (2015). Three Principles to REVISE People's Unethical Behavior. *Perspectives on Psychological Science*, 10(6), 738-741.
- Badua, F. (2015). Laying Down the Law on Lockheed: How an Aviation and Defense Giant Inspired the Promulgation of the Foreign Corrupt Practices Act of 1977. *Accounting Historians Journal*, 42(1), 105-126.
- Bahoo, S., Alon, I., & Paltrinieri, A. 2020. Corruption in International Business: A Review and Research Agenda. *International Business Review*, 29(4), 101660.
- Balachandran, B. V., & Ramakrishnan, R. T. S. (1980). Internal Control and External Auditing for Incentive Compensation Schedules. *Journal of Accounting Research*, 18, 140-171.
- Bayer, A. E., Smart, J. C., & McLaughlin, G. W. (1990). Mapping Intellectual Structure of a Scientific Subfield Through Author Co-Citations. *Journal of the American Society for Information Science*, 41(6), 444-452.
- Baughn, C., Bodie, N. L., Buchanan, M. A., & Bixby, M. B. (2010). Bribery in International Business Transactions. *Journal of Business Ethics*, 92(1), 15-32.
- Beaver, D. (2001). Reflections on Scientific Collaboration (and Its Study): Past, Present, and Future. *Scientometrics*, 52(3), 365-377.
- Beer, M. (2009). Sustain Organizational Performance Through Continuous Learning, Change, and Realignment. In *Handbook of Principles of Organizational Behavior* (2nd ed., pp. 537-555). Wiley.
- Berghoff, H. (2018). Organised Irresponsibility?: Siemens Corruption Scandal of the 1990s and 2000s. *Business History*, 60(3), 423-445.
- Bird, F. B., & Waters, J. A. (1989). The Moral Muteness of Managers. *California Management Review*, 32(1), 73-88.
- Blanken, I., Van De Ven, N., & Zeelenberg, M. (2015). A Meta-Analytic Review of Moral Licensing. *Personality and Social Psychology Bulletin*, 41(4), 540-558.
- Boiko, K. (2021). R&D Activity and Firm Performance: Mapping the Field. *Management Review Quarterly*, 1-37.
- Bouzzine, Y. D., & Lueg, R. (2022). CSR, Moral Licensing and Organizational Misconduct: A Conceptual Review. *Organization Management Journal*, ahead-of-print. <https://doi.org/10.1108/OMJ-09-2021-1355>.
- Brooks, L. J. (1997). Business Ethics in Canada: Distinctiveness and Directions. *Journal of Business Ethics*, 16(6), 591-604.
- Brown, H. L. (2016). Emerging Issues in Compliance with the Foreign Corrupt Practices Act: A Case of Arrested Development. *Santa Clara Journal of International Law*, 14, 203-264.

- Brown, H. L. (2001). Corporate Director's Compliance Oversight Responsibility in the Post-Caremark Era. *Delaware Journal of Corporate Law*, 26, 1-145.
- Brown, H. L. (1998). Parent-Subsidiary Liability Under the Foreign Corrupt Practices Act. *Baylor Law Review*, 50(1), 1-63.
- Burnham, T. A., Jeon, H. J., & Zeng, H. (2018). Illegal corporate Bribery: The Pressure to "Make Do" and Achieve Goals. *Journal of Marketing Theory & Practice*, 26(3), 246-259.
- Cancino, C. A., Merigó, J. M., & Coronado, F. C. (2017). A Bibliometric Analysis of Leading Universities in Innovation Research. *Journal of Innovation & Knowledge*, 2(3), 106-124.
- Cassin, R. L. (2010). Alcatel-Lucent Settles Bribery Case. *The FCPA Blog*. <https://tinyurl.com/j38cf976>.
- Chanda, P. (2021). Make Way for Data Analytics and Automation. *QEP Magazine*, May. <https://compliancecosmos.org/make-way-data-analytics-and-automation>.
- Chen, Y., Yasar, M., & Rejesus, R. M. (2008). Factors Influencing the Incidence of Bribery Payouts by Firms: A Cross-Country Analysis. *Journal of Business Ethics*, 77(2), 231-244.
- Cheng, K. H., & Cascio, W. (2009). Performance Appraisal Beliefs of Chinese Employees in Hong Kong and the Pearl River Delta. *International Journal of Selection and Assessment*, 17(3), 329-333.
- Cleveland, M., Favo, C. M., Freckle, T. J., & Owens, C. L. (2009). Trends in the International Fight Against Bribery and Corruption. *Journal of Business Ethics*, 90(2), 199-244.
- Coalition for Integrity (2021). *Using Machine Learning for Anti-Corruption Risk and Compliance*. Coalition for Integrity. <https://tinyurl.com/2p9fh36y>.
- Cobo, M. J., López-Herrera, A. G., Herrera-Viedma, E., & Herrera, F. (2011). An Approach for Detecting, Quantifying, and Visualizing the Evolution of a Research Field: A Practical Application to the Fuzzy Sets Theory Field. *Journal of Informetrics*, 5(1), 146-166.
- Colón, R., & Bladuell, H. G. (2014). Auditors and the Foreign Corrupt Practices Act: Lessons from Latin America. *Accounting in Latin America (Research in Accounting in Emerging Economies, Vol. 14)*, Emerald Group Publishing Limited, pp. 105-133.
- Cragg, W. (2005). *Ethics Codes, Corporations, and the Challenge of Globalization*. Edward Elgar Publishing.
- Cuervo-Cazurra, A. (2006). Who Cares About Corruption? *Journal of International Business Studies*, 37(6), 807-822.
- Cuervo-Cazurra, A. (2008). The Effectiveness of Laws Against Bribery Abroad. *Journal of International Business Studies*, 39(4), 634-651.
- Cuervo-Cazurra, A. (2016). Corruption in International Business. *Journal of World Business*, 51(1), 35-49.
- Cullen, J. B., Parboteeah, K., & Hoegl, M. (2004). Cross-National Differences in Managers' Willingness to Justify Ethically Suspect Behaviors: A Test of Institutional Anomie Theory. *Academy of Management Journal*, 47(3), 411-421.
- Dalton, M. M. (2005). Efficiency v. Morality: The Codification of Cultural Norms in the Foreign Corrupt Practices Act. *New York University Journal of Law and Business*, 2, 583-639.
- Darrough, M. N. (2010). The FCPA and the OECD Convention: Some Lessons from the US Experience. *Journal of Business Ethics*, 93(2), 255-276.
- Dass, N., Nanda, V., & Xiao, S. C. (2021). Geographic Clustering of Corruption in the United States. *Journal of Business Ethics*, 173(3), 577-597.
- de la Torre, M. J. (2016). The Foreign Corrupt Practices Act: Imposing an American Definition of Corruption on Global Markets. *Cornell International Law Journal*, 49(2), 469-495.
- Deming, S. H. (2011). The Oil Industry and Africa: The Expanding Reach of the Foreign Corrupt Practices Act. *The Law and Development Review*, 4(3), 311-370.
- DiMaggio, P. J., & Powell, W. W. (1983). The Iron Cage Revisited. Institutional Isomorphism and Collective Rationality. *American Sociological Review*, 48(2), 147-160.

- Dodds, M. A. (2015). Foreign Corrupt Practices Act Cases Impact Sports Marketing Strategies. *Sport Marketing Quarterly*, 24(4), 258-260.
- Donaldson, T., & Dunfee, T. W. (1994). Towards a Unified Conception of Business Ethics: Integrative Social Contracts Theory. *Academy of Management Review*, 19, 252-284.
- Erie, M. S. (2019) Anticorruption as Transnational Law: The Foreign Corrupt Practices Act, PRC Law, and Party Rules in China. *The American Journal of Comparative Law*, 67(2), 233-279.
- Friedman, M. (1970). The Social Responsibility of Business is to Increase its Profits. *New York Times Magazine*, September 13, 122-126.
- Furnham, A., & Taylor, J. (2011). *Bad Apples: Identity, Prevent & Manage Negative Behavior at Work*. Springer.
- Galvin, M., & Chen, H. (2019). Driving Transparency in Corporate Compliance: A Suggested Approach for Using Technology to Influence Behavior for the New Decade. *International In-house Counsel Journal*, 12(48), 1-10.
- Geo-JaJa, M. A., & Mangum, G. L. (2000). The Foreign Corrupt Practices Act's Consequences for US Trade: The Nigerian Example. *Journal of Business Ethics*, 24(3), 245-255.
- George, B. C., Lacey, K. A., & Birmele, J. (2000). The 1998 OECD Convention: An Impetus for Worldwide Changes in Attitudes Toward Corruption in Business Transactions. *American Business Law Journal*, 37(3), 485-525.
- Gino, F., Moore, D. A., & Bazerman, M. H. (2008). *See No Evil: When We Overlook Other People's Unethical Behavior*. Working Paper, 08-045. Harvard Business School. <https://tinyurl.com/2p8pmdk4>.
- Gino, F., Schweitzer, M. E., Mead, N. L., & Ariely, D. (2011). Unable to Resist Temptation: How Self-Control Depletion Promotes Unethical Behavior. *Organizational Behavior and Human Decision Processes*, 115(2), 191-203.
- Gleich, O., & Woodward, R. (2005). Foreign Corrupt Practices Act. *The American Criminal Law Review*, 42(2), 545-571.
- Graham, J. L. (1984). The Foreign Corrupt Practices Act: A New Perspective. *Journal of International Business Studies*, 15(3), 107-121.
- Greppin, C., Lyytinen, K., Ufere, N., & Wang Y. (2020). What Motivates Participation in Corruption and How Does Such Participation Affect Firm Performance? *Academy of Management Annual Conference Proceedings*, 10263.
- Greve, H. R., Palmer, D., & Pozner, J. E. (2010). Organizations Gone Wild: The Causes, Processes, and Consequences of Organizational Misconduct. *Academy of Management Annals*, 4(1), 53-107.
- Griep, Y., & Zacher, H. (2021). Temporal Dynamics in Organizational Psychology. *Oxford Research Encyclopedias: Psychology*. <https://doi.org/10.1093/acrefore/9780190236557.013.32>.
- Hess, R. K., & Kossack, E. W. (1981). Bribery as an Organizational Response to Conflicting Environmental Expectations. *Journal of the Academy of Marketing Science*, 9(3), 206-226.
- Hofstede, G. (1997). *Cultures and Organizations: Software of the Mind*. McGraw-Hill.
- Hota, P. K., Subramanian, B., & Narayanamurthy, G. (2020). Mapping the Intellectual Structure of Social Entrepreneurship Research: A Citation/Co-Citation Analysis. *Journal of Business Ethics*, 166(1), 89-114.
- Hotchkiss, C. (1998). The Sleeping Dog Stirs: New Signs of Life in Efforts to End Corruption in International Business. *Journal of Public Policy & Marketing*, 17(1), 108-115.
- House, R. J., Hanges, P. J., Javidan, M., Dorfman, P. W., & Gupta, V. (2004). *Culture Leadership and Organizations*. Sage.
- Huang, M. (2016). *Financial Reporting Quality in Corrupt Firms: Evidence from the Foreign Corrupt Practices Act* [PhD Dissertation]. University of Rochester.

- Hunter, R. J., Mest, D., & Shannon, J. (2011). A Focus on the Foreign Corrupt Practices Act (FCPA): Siemens and Halliburton Revisited as Indicators of Corporate Culture. *Atlantic Law Journal*, 13, 60-90.
- Huskins, P. C. (2008). FCPA Prosecutions: Liability Trend to Watch. *Stanford Law Review*, 60(5), 1447-1457.
- Impert, J. (1985). Relations with Outside Counsel in the Asia Pacific. *International Lawyer*, 19, 29-37.
- Jaeschke, R., Lopatta, K., & Yi, C. (2018). Managers' Use of Language in Corrupt Firms' Financial Disclosures: Evidence from FCPA Violators. *Scandinavian Journal of Management*, 34(2), 170-192.
- Jensen, M. C. (1993). The Modern Industrial Revolution, Exit, and the Failure of Internal Control Systems. *Journal of Finance*, 48, 831-880.
- Ji, Y. G., Tao, W., & Rim, H. (2021). Theoretical Insights of CSR in Communication from 1980 to 2018: A Bibliometric Network Analysis. *Journal of Business Ethics*. <https://tinyurl.com/56ac67th>.
- Jia, W., Li, S., & Zhao, J. (2022). Kicking Back Against Kickbacks: An Examination of the Foreign Corrupt Practices Act and US Foreign Investment. *Journal of International Business Studies*, 53(2), 326-343.
- Kaikati, J. G., Sullivan, G. M., Virgo, J. M., Carr, T. R., & Virgo, K. S. (2000). The Price of International Business Morality: Twenty Years Under the Foreign Corrupt Practices Act. *Journal of Business Ethics*, 26(3), 213-222.
- Kamtekar, R. (2004). Situationism and Virtue Ethics on the Content of our Character. *Ethics*, 114(3): 458-491.
- Kanter, R. M., Stein, B. A., & Jick, T. D. 1992. *The Challenge of Organizational Change: How Companies Experience It and Leaders Guide It*. Free Press.
- Koehler, M. (2009). The Facade of FCPA Enforcement. *Georgetown Journal of International Law*, 41, 907-1009.
- Koehler, M. (2012a). The Story of the Foreign Corrupt Practices Act. *Ohio State Law Journal*, 73, 929-1013.
- Koehler, M. (2012b). Revisiting a Foreign Corrupt Practices Act Compliance Defense. *Wisconsin Law Review*, 609-659.
- Koehler, M. (2020). Foreign Corrupt Practices Statistics, Qualitative Issues, and Other Developments. *Vanderbilt Journal of Transnational Law*, Forthcoming.
- Kostova, T., & Roth, K. (2002). Adoption of an Organizational Practice by Subsidiaries of Multinational Corporations: Institutional and Relational Effects. *Academy of Management Journal*, 45(1), 215-233.
- Kotter, J. P. (1995). Leading Change: Why Transformation Efforts Fail. *Harvard Business Review*, 73(2), 59-67.
- Krampen, G., Alexander Von Eye, A., & Gabriel Schui, G. (2011). Forecasting Trends of Development of Psychology from a Bibliometric Perspective. *Scientometrics*, 87(3), 687-694.
- Kuhn, T. (1962). *The Structure of Scientific Revolutions*. University of Chicago Press.
- Kumar, V., Patel, S., Sharma, S., Kumar, R., & Kaur, R. (2022). Fifty Years of Cervical Myelopathy Research: Results from a Bibliometric Analysis. *Asian Spine Journal*. <https://doi.org/10.31616/asj.2021.0239>.
- Larson, W. L. (1980). Effective Enforcement of the Foreign Corrupt Practices Act. *Stanford Law Review*, 32(3), 561-580.
- Lawson, B. P., Martin, G., Muriel, L., & Wilkins, M. S. (2019). How Do Auditors Respond to FCPA Risk? *Current Issues in Auditing*, 13(2), 21-28.

- Lee, S.-H., Oh, K., & Eden, L. (2010). Why Do Firms Bribe? Insights from Control Theory into Firms' Exposure and Vulnerability to Corruption. *Management International Review*, 50(6), 775–796.
- Lewin, K. (1947). Frontiers in Group Dynamics: Concept, Method and Reality in Social Science: Social Equilibria and Social Change. *Human Relations*, 1, 5-41.
- Li, N., & van Rooij, B. (2021). Law Lost, Compliance Found: A Frontline Understanding of the Non-Linear Nature of Business and Employee Responses to Law. *Journal of Business Ethics*. <https://tinyurl.com/yc5jke7u>.
- Lindgreen, A., Di Benedetto, C. A., Brodie, R. J., & Van der Borgh, M. (2020). How to Undertake Great Cross-Disciplinary Research. *Industrial Marketing Management*, 90, A1-A5.
- Longenecker, J. G., McKinney, J. A., & Moore, C. W. (1988). The Ethical Issue of International Bribery: A Study of Attitudes Among US Business Professionals. *Journal of Business Ethics*, 7(5), 341-346.
- Low, L. A. (2003). The Anti-Corruption Laws of the United States and Mexico. *United States – Mexico Law Journal*, 11, 149-157.
- Low, L. A., Bjorklund, A. K., & Atkinson, K. C. (1997). The Inter-American Convention Against Corruption: A Comparison with the United States Foreign Corrupt Practices Act. *Virginia Journal of International Law*, 38, 243-292.
- Lyon, J. D., & Maher, M. W. (2005). The Importance of Business Risk in setting Audit Fees: Evidence from Cases of Client Misconduct. *Journal of Accounting Research*, 43(1), 133-151.
- Maher, M. W. (1981). The Impact of Regulation Controls: Firms' Response to the Foreign Corrupt Practices Act. *Accounting Review*, 56(4), 751-770.
- Martin, B.R. (1996). The Use of Multiple Indicators in the Assessment of Basic Research. *Scientometrics*, 36, 343–362.
- Martin, K., Cullen, K., Johnson, J., & Parboteeah, K. (2007). Deciding to Bribe: A Cross-Level Analysis of the Firm and Home Country Influences on Bribery Activity. *Academy of Management Journal*, 50(6), 1401–1422.
- McCarthy, D. J., Puffer, S. M., Dunlap, D. R., & Jaeger, A. M. (2012). A Stakeholder Approach to the Ethicality of BRIC-Firm Managers' Use of Favors. *Journal of Business Ethics*, 109(1), 27-38.
- Moed, H. F., Burger, W. J. M., Frankfort, J. G., & van Raan, A. F. J. (1985). The Use of Bibliometric Data for the Measurement of University Research Performance. *Research Policy*, 14, 131–149.
- Moore, C. (2008). Moral Disengagement in Processes of Organizational Corruption. *Journal of Business Ethics*, 80(1), 129-139.
- Morgeson, F. P., Mitchell, T. R., & Liu, D. (2015). Event System Theory: An Event-Oriented Approach to the Organizational Sciences. *Academy of Management Review*, 40: 515–537.
- Moscovici, S., & Faucheux, C. (1972). Social Influence, Conformity Bias, and the Study of Active Minorities. In Berkowitz, L. (Ed). *Advances in Experimental Social Psychology*, 6, 149-202: Elsevier.
- Oliver, C. (1991). Strategic Responses to Institutional Processes. *Academy of Management Review*, 16(1), 145-179.
- Pastin, M., & Hooker, M. (1980). Ethics and the Foreign Corrupt Practices Act. *Business Horizons*, 23(6), 43-47.
- Pieth, M., Low, L. A., & Cullen, P. J. (2007). *The OECD Convention on Bribery: A Commentary*. Cambridge University Press.
- Pines, D. (1994). Amending the Foreign Corrupt Practices Act to Include a Private Right of Action. *California Law Review*, 82(1), 185-229.
- Piotrowski, C. (2019). Contemporary Research Emphasis in Personality Assessment: A Bibliometric Analysis Mapping Investigatory Domain (2009–2018). *SIS Journal of Projective Psychology and Mental Health*, 26(2), 97-103.

- Poje, T., & Groff, M. Z. (2021). Mapping Ethics Education in Accounting Research: A Bibliometric Analysis. *Journal of Business Ethics*, 1-22. <https://tinyurl.com/2p8hf9jg>.
- Posthuma, R. A. (2021). High Compliance Work Systems: Innovative Solutions for Firm Success and Control of Foreign Corruption. *Business Horizons*, 65(2), 205-214.
- Posthuma, R. A., & Campion, M. A. (2008). Twenty Best Practices for Just Employee Performance Reviews: Employers Can Use a Model to Achieve Performance Reviews that Increase Employee Satisfaction, Reduce the Likelihood of Litigation and Boost Motivation. *Compensation & Benefits Review*, 40(1), 47-55.
- Posthuma, R. A., Campion, M. C., & Campion, M. A. (2018). A Taxonomic Foundation for Evidence-Based Research on Employee Performance Management. *European Journal of Work and Organizational Psychology*, 27(2), 168-187.
- Powell, W. W., & DiMaggio, P. J. (2012). *The New Institutionalism in Organizational Analysis*. University of Chicago Press.
- PWC (2022). *Anti-Bribery & Anti-Corruption (ABAC)*. <https://www.pwc.com/sg/en/services/consulting/forensics/anti-bribery-anti-corruption.html>.
- Radin, T. J. (1999). *Stakeholder Theory and the Law*. [PhD Dissertation]. University of Virginia.
- Rusch, J. J. (2016). The Social Psychology of Corruption. In *Proceedings, 2016 OECD Integrity Forum, Fighting the Hidden Tariff: Global Trade Without Corruption*. Paris: OECD.
- Rusch, J. J. (2018) Socrates in the C-suite: The Need for Socratic Dialogue in Corporate Compliance. *Journal of Financial Compliance*, 2(2), 176-183.
- Salbu, S. R. (1997). Bribery in the Global Market: A Critical Analysis of the Foreign Corrupt Practices Act. *Washington and Lee Law Review*, 54, 229-287.
- Salbu, S. R. (1999). Extraterritorial Restriction of Bribery: A Premature Evocation of the Normative Global Village. *Yale Journal of International Law*, 24, 223-255.
- Salbu, S. R. (2018). Mitigating the Harshness of FCPA Enforcement Through a Qualifying Good-Faith Compliance Defense. *American Business Law Journal*, 55(3). 475-535.
- Sampath, V. S., Gardberg, N. A., & Rahman, N. (2018). Corporate Reputation's Invisible Hand: Bribery, Rational Choice, and Market Penalties. *Journal of Business Ethics*, 151(3), 743-760.
- Sanyal, R. (2012). Patterns in International Bribery: Violations of the Foreign Corrupt Practices Act. *Thunderbird International Business Review*, 54(3), 299-309.
- Sanyal, R., & Guvenli, T (2009). The Propensity to Bribe in International Business: The Relevance of Cultural Variables. *Cross Cultural Management: An International Journal*, 16(3), 287-300.
- Sanyal, R., & Samanta, S. (2011). Trends in International Bribe-Giving: Do Anti-Bribery Laws Matter? *Journal of International Trade Law and Policy*, 10(2), 151-164.
- Schein, E. H. (2019). *The Corporate Culture Survival Guide*. Jossey-Bass.
- Shapiro, D. M. (2013). Treasurers, Bribery, and the FCPA: Is There a Better Way? *Journal of Corporate Accounting & Finance*, 25(1), 39-42.
- Shapiro, B., & Matson, D. (2008). Strategies of Resistance to Internal Control Regulation. *Accounting Organizations and Society*, 33(2-3). 199-228.
- Shaw, B. (1988). Foreign Corrupt Practices Act - A Legal and Moral Analysis. *Journal of Business Ethics*, 7(10), 789-795.
- Siedel, G. J. (1981). Internal Accounting Controls Under the Foreign Corrupt Practices Act - A Federal Law of Corporations. *American Business Law Journal*, 18(4), 443-475.
- Singh, S. (2017). Competition in Corruptible Markets. *Marketing Science*, 36(3), 361-381.
- Sinkovics, N., & Reuber, A. R. (2021). Beyond Disciplinary Silos: A Systematic Analysis of the Migrant Entrepreneurship Literature. *Journal of World Business*, 56(4), 101223. <https://tinyurl.com/4amc7ma2>.

- Shnitser, N. (2010). A Free Pass for Foreign Firms? An Assessment of SEC and Private Enforcement Against Foreign Issuers. *The Yale Law Journal*, 119(7), 1638-1701.
- Spencer, J., & Gomez, C. (2011). MNEs and Corruption: The Impact of National Institutions and Subsidiary Strategy. *Strategic Management Journal*, 32(3), 280–300.
- Stanford Foreign Corrupt Practices Act Clearinghouse. (2021). *Stanford Law School Foreign Corrupt Practices Act Clearinghouse a collaboration with Sullivan Cromwell, LLP*. <https://fcpa.stanford.edu/preferences.html>.
- Stevens, B. (1994). An Analysis of Corporate Ethical Code Studies – Where Do We Go from Here? *Journal of Business Ethics*, 13(1), 63-69.
- Stouten, J., Rousseau, D. M., & De Cremer, D. (2018). Successful Organizational Change: Integrating the Management Practice and Scholarly Literature. *Academy of Management Annals*, 12(2), 752-788.
- Sweetbaum, H. (2008). Socially Responsible Capitalism. *Society and Business Review*, 3(3), 186-190.
- Tamala, J. K., Maramag, E. I., Simeon, K. A., & Ignacio, J. J. (2022). A Bibliometric Analysis of Sustainable Oil and Gas Production Research Using VOSviewer. *Cleaner Engineering and Technology*, 7, 100437.
- Taylor, P. (2009). Strategic FCPA Compliance: The Role of Continuous Monitoring as a Proactive Control. *Corporate Finance Review*, 14(2), 2-5.
- United States Securities and Exchange Commission (SEC) (2021). *SEC Enforcement Actions: FCPA Cases*. <https://www.sec.gov/enforce/sec-enforcement-actions-fcpa-cases>.
- Van Eck, N.J., & Waltman, L. (2018). *VOSviewer Manual: Manual for VOSviewer Version 1.6.8*. Centre for Science and Technology Studies, Universiteit Leiden, Netherlands. <https://tinyurl.com/mw53ckwb>.
- Van Raan, A. F. (2014). Advances in Bibliometric Analysis: Research Performance Assessment and Science Mapping. *Bibliometrics Use and Abuse in the Review of Research Performance*, 87, 17-28.
- Verbeek, A., Debackere, K., Luwel, M., & Zimmermann, E. (2002). Measuring Progress and Evolution in Science and Technology—I: The Multiple Uses of Bibliometric Indicators. *International Journal of Management Reviews*, 4(2), 179-211.
- Vladutz, G., & Cook, J. (1984). Bibliographic Coupling and Subject Relatedness. *Proceedings of the American Society for Information Science*, 21, 204–207.
- Weber, J., & Wasieleski, D. (2013). Corporate Ethics and Compliance Programs: A Report, Analysis, and Critique. *Journal of Business Ethics*, 112(4), 609-626.
- Weismann, M. F. (2009). The Foreign Corrupt Practices Act: The Failure of the Self-Regulatory Model of Corporate Governance in the Global Business Environment. *Journal of Business Ethics*, 88(3), 615-661.
- Weismann, M., Buscaglia, C., & Peterson, J. (2014). The Foreign Corrupt Practices Act: Why it Fails to Deter Bribery as a Global Market Entry Strategy. *Journal of Business Ethics*, 123(4), 591-619.
- White, L. T. (2013). *A Program Evaluation on the Viability of a Foreign Corrupt Practices Act (FCPA) Program Implemented in a Multinational Organization in Corporate America*. Dissertation Abstracts International, Publication No. 3556948).
- Winer, K. (1999). Doing It Right—Overseas: Compliance Programs Take on New Importance in a Global Economy. *Business Law Today*, 44-50.
- Wright, P. M., & Haggerty, J. J. (2005). Missing Variables in Theories of Strategic Human Resource Management: Time, Cause, and Individuals. *Management Revue*, 16(2): 164-173.
- Wu, Y., & van Rooij, B. (2021). Compliance Dynamism: Capturing the Polynormative and Situational Nature of Business Responses to Law. *Journal of Business Ethics*, 168, 579-591.
- Yockey, J. W. (2012). FCPA Settlement, Internal Strife, and the "Culture of Compliance." *Wisconsin Law Review*, 2, 689-716.

- Zupic, I., & Čater, T. (2015). Bibliometric Methods in Management and Organization. *Organizational Research Methods*, 18(3), 429-472.
- Zhang, Y., Hou, Z., Yang, F., Yang, M. M., & Wang, Z. (2021). Discovering the Evolution of Resource-Based Theory: Science Mapping Based on Bibliometric Analysis. *Journal of Business Research*, 137, 500-516.

APPENDIX

Mean FCPA Enforcements by Firm Headquarter Countries, Number of Cases, Mean Settlement Amounts, and Mean Year of Settlements, 1978 – 2021

Headquarters Countries of Firms	FCPA		
	Enforcement Cases	Mean Settlement Amounts Per Firm	Mean Year of Settlements
United States	168	\$43,420,657	2008
United Kingdom	13	\$76,965,328	2013
Germany	10	\$144,410,888	2015
Switzerland	8	\$111,627,884	2014
Japan	7	\$101,686,119	2014
Netherlands	7	\$454,632,147	2013
Brazil	6	\$407,291,246	2018
France	6	\$376,103,506	2014
Italy	4	\$101,902,286	2010
Sweden	3	\$695,068,874	2015
Canada	2	\$662,500	2017
Chile	2	\$26,337,644	2017
Israel	2	\$519,177,348	2017
Singapore	2	\$211,277,330	2013
Australia	1	\$25,000,000	2015
Barbados	1	\$93,940	2018
Belgium	1	\$6,720,987	2007
Bermuda	1	\$6,720,987	2007
China	1	\$1,000,000	2013
Denmark	1	\$18,030,145	2009
Hungary/Germany	1	\$95,000,000	2011
Indonesia	1	\$0	2001
Luxembourg	1	\$8,928,338	2011
Norway	1	\$21,000,000	2006
Russia	1	\$850,000,000	2019
South Korea	1	\$75,481,600	2019
Mean	9.7	\$94,536,743	2013

Note: Data Source Stanford FCPA Clearinghouse, 2021