

Cross-Border Enforcement Priorities and Increased Cooperation Come Into Focus

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Key Points

- Enforcement of sanctions, anti-corruption, asset recovery, and anti-money laundering and counterterrorist financing laws is increasing along with new cooperation initiatives in Europe, the Middle East and Asia Pacific.
- For example, the United Arab Emirates and Singapore brought landmark enforcement actions, and the U.K., EU, China, Mexico, Chile and Peru have each put in place stricter laws or regulations on financial crimes.

Companies can expect an enforcement environment in 2026 that is increasingly coordinated, data-driven and globally integrated, with enforcement authorities and regulators across Europe, the Middle East and Asia Pacific pursuing cross-border cases with greater speed, consistency and operational alignment.

U.S. cross-border enforcement is likely to continue to focus on matters that impact U.S. national security, economic security and supply chain-related risks. Across jurisdictions, authorities are expected to continue relying on a growing number of whistleblower reports as an important source of enforcement leads.

The Americas

The U.S. Department of Justice (DOJ) has set out key priority areas for enforcement that include:

- Conduct that threatens national security (*i.e.*, sanctions violations or support of cartels and transnational criminal organizations).
- Trade and customs fraud (including tariff evasion).
- Material support of foreign terrorist organizations.
- Complex money laundering schemes.
- Fraud related to federal programs
- Securities fraud and market manipulation schemes.

The DOJ remains focused on prosecuting cases of “serious misconduct,” particularly against individuals, and cases of misconduct that undermine U.S. interests. Foreign

Corrupt Practices Act (FCPA) enforcement has resumed with a focus on bribery and associated money laundering that impact national interests and security.

This may lead to an increased focus on non-U.S. companies whose alleged corrupt conduct harms American competitiveness in international markets. The DOJ’s Corporate Whistleblower Awards Pilot Program remains in effect.

The Securities and Exchange Commission (SEC) has turned its attention to core areas such as insider trading, accounting and disclosure fraud, market manipulation and breaches of fiduciary duties by investment advisers. The SEC also launched a [Cross-Border Task Force](#) in September 2025, prioritizing foreign issuers, gatekeepers and cross-listed entities.

With respect to cryptocurrency enforcement, the SEC appears focused on fraud rather than registration issues.

Elsewhere in the Americas, enforcement authorities remain focused on combating financial crime, with heightened focus on anti-corruption, money laundering and fraud prevention linked to organized crime.

- **Mexico** has enhanced international coordination relating to cartel finance structures.
- **Brazil** expanded cooperation with the U.S. Department of Homeland Security to target transnational crime networks
- **Mexico, Chile** and **Peru** are also implementing stricter fraud prevention regulations and enhanced anti-money laundering (AML) regulations.

Europe and the United Kingdom

European Union sanctions enforcement has intensified following [Directive \(EU\) 2024/1226](#), which harmonizes criminal offenses for sanctions violations across member states. Corporate fines can reach 5% of global turnover, or up to €40 million, and member states must criminalize circumvention. Germany and the Netherlands are among the most active enforcers.

The EU is developing a comprehensive Anti-Corruption Directive (expected in 2026), supported by the International Anti-Corruption Prosecutorial Taskforce (IACT). IACT includes U.K., French and Swiss authorities as well as the European Public Prosecutor's Office, and it facilitates joint investigations, coordinated settlements and intelligence-sharing in complex cross-border cases.

The U.K. "Failure to Prevent Fraud" law came into effect in 2025. Companies are criminally liable for fraudulent acts committed by senior managers or associated persons that benefit the organization, unless the company had "reasonable prevention procedures."

The offense applies to all large organizations, has extraterritorial reach and significantly expands corporate exposure for a number of fraud-related offenses, including:

- Fraud by false misstatements.
- Fraud by failure to disclose information.
- False accounting.

Middle East and Africa

Cross-border anti-corruption enforcement and asset recovery cooperation accelerated in 2025. Saudi Arabia led the United Nations-backed GloBE Network, connecting over 220 anti-corruption agencies for intelligence-sharing.

The United Arab Emirates (UAE), which was removed from the Financial Action Task Force (FATF) "gray list" in 2024, intensified its AML/counterterrorist financing supervision and enforcement, imposed record-level sanctions on financial institutions and entered new mutual legal assistance treaties with the U.S. and the Philippines.

Meanwhile, the Middle East and North Africa Asset Recovery Inter-Agency Network (MENA-ARIN), which held its inaugural meeting in October 2025, aims to facilitate tracing, freezing, seizure and recovery of illicit assets.

Asia Pacific

Authorities strengthened financial crime and anti-corruption cooperation, and enhanced AML laws. The Monetary Authority of Singapore imposed landmark penalties for AML breaches and prioritized stronger regulations and collaboration in the digital assets sector.

In September 2025, Singapore hosted the INTERPOL Asian Regional Conference, in which the Silver Notice, an intelligence-sharing tool launched in January 2025 across 51 jurisdictions to trace illicit assets and enable coordinated action on transnational financial crime, was featured.

The Silver Notice's elevated profile indicates that, in 2026, authorities across the region will make greater use of shared intelligence platforms to trace assets, align investigative efforts and react more quickly to cross-border misconduct.

China's amended Anti-Money Laundering Law, effective January 2025, expanded compliance obligations to nonfinancial institutions and introduced a national ultimate beneficial owner registry. The law applies extraterritorially to overseas money laundering and terrorist financing threatening China's interests.

China and member states of the Association of Southeast Asian Nations (ASEAN) have also pledged to deepen cooperation on money laundering, bribery and transnational crime.

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- + With Supportive New Regulations, Digital Assets Are Likely to Proliferate in 2026
- + Corporate Compliance Remains Critical as State Enforcement Initiatives Gain Momentum Following Governors' Races
- + SEC Moves to Lighten Regulation and Encourage Capital Formation



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