



Global Governance and Compliance

Who we are

DLA Piper has unparalleled experience helping clients throughout the business lifecycle meet the evolving – and sometimes conflicting – expectations of regulatory and enforcement agencies. Our Compliance team consists of skilled attorneys in more than 40 countries, including former general counsels and chief compliance officers and business leaders who ensure we provide practical and results-oriented advice. Former regulators, senior policy officials and experienced trial attorneys around the globe offer the knowledge and experience necessary to address client needs in a way that will meet regulators' expectations.

What we do

We have the global breadth, local knowledge and industry experience to guide clients in all aspects of compliance issues.



Designing, implementing &
monitoring compliance programs



Assessing and mitigating risk

KEY CONTACTS

Adam Vause

Partner
Dubai
T: +971 4 438 6343
adam.vause@dlapiper.com

Sammy Fang

Partner
Hong Kong
T: +852 2103 0649
sammy.fang@dlapiper.com

Stefanie Jill Fogel

Partner
Boston
T: +1 617 406 6053
stefanie.fogel@dlapiper.com

Brett Ingerman

Partner
Baltimore (Mount
Washington)
T: +1 410 580 4177
brett.ingerman@dlapiper.com

Nathan Bush

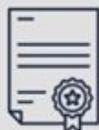
Partner
Singapore
T: +65 6512 6065
nathan.bush@dlapiper.com

Patrick Rappo

Partner



Detecting and investigating
potential misconduct



Remediating compliance issues

London

T: +44 (0) 20 7153

7258

Patrick.rappo@dlapiper.com

How we do it

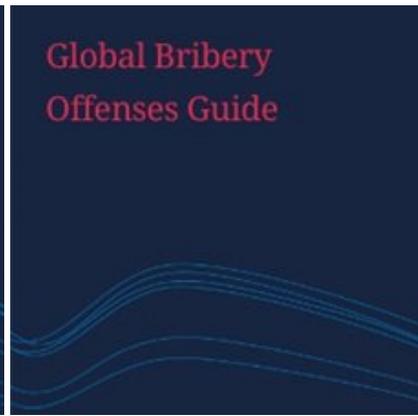
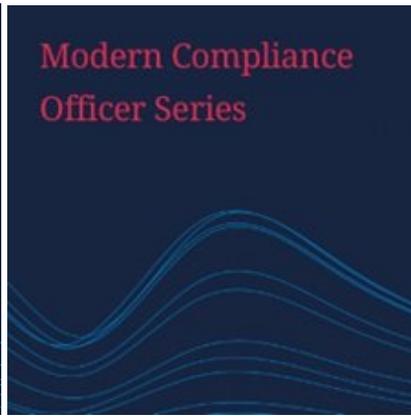
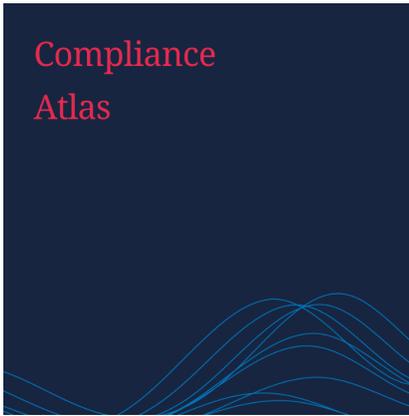
Using cross-functional teams to establish a seamless, integrated approach, as well as leveraging local and industry-specific experts, DLA Piper's Global Governance and Compliance team provides real-time local insight and strategic analysis to help our clients navigate the compliance intricacies and risks associated with their businesses.

The Global Governance and Compliance team additionally provides innovative, value-added tools, such as our compliance films, our CLE webinar series targeted towards the modern compliance officer and a free, abbreviated version of COMPASS, a compliance risk assessment, to help your team and company stay on top of its evolving compliance program.

Compliance Survey
Website

Compliance
Films

COMPASS



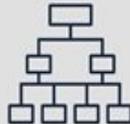
CAPABILITIES

Our service offering is multifaceted and tailored to each client's unique needs. Subject-matter-specific advice, including anti-bribery and anticorruption, anti-money laundering, antitrust and competition, trade compliance, environmental compliance, food and product safety, data privacy and cybersecurity, political contributions/lobbying, trade and sanctions, among others. Other services include:

Assessments of risks factors as balanced against the strategic plan and go-to-market strategy



Process mapping to determine control architecture



Development of statistical models to judge the health of the client's reporting system and provide insights



Communication strategies
for setting the right tone



Management of structured
and unstructured data to
provide statistical inferences
of risk-profiled behaviors



Creation and/or review of
tailored policies and
procedures



Deployment of client-owned
mobile applications to place
the policies and procedures
at the point of impact



Monitoring and testing
compliance program control
strategy and metrics



Design and implementation
of targeted training programs
mapped against employee
roles and responsibilities



Development of hotline procedures, escalation protocols and investigation procedures



Offering intelligence on - and insight into - regulatory developments



Management of regulatory and commercial crises



EXPERIENCE

- Represented the audit committee of a multinational technology company in an internal investigation focused on whether certain payments made by the company's India operations were made improperly and in possible violation of the FCPA and other applicable laws. As part of the engagement, we coordinate with local counsel and the company's local and global financial auditors. We advised the client on remediation to its global compliance and ethics program. The scope of the remediation not only included the anticorruption compliance program, but also advice on strengthening the core ethics component of its global corporate compliance program.
- Assisting a major multi-national cosmetics company to design, manage and implement a series of compliance initiatives in its APAC, EMEA, LATAM and North American markets. We worked together to update a pre-existing global compliance risk assessment, designed and implemented a compliance monitoring program, worked with internal audit to improve the auditing of the compliance management function, revised investigation protocols to improve efficiency and protect the applicable privileges, drafted or revised numerous compliance policies (including anti-corruption, gift-giving/hosting, trade sanctions, conflict of interest, social media, free merchandise, cash advance, direct government engagements and third-party vendor due diligence), and developed a global training plan. We also conducted an objective risk assessment on third-party vendors, designed an effective due diligence program for the vendor base, and administered the due diligence process on those vendors that presented the highest risk.
- Undertaking a comprehensive review of data privacy laws in 67 jurisdictions for a leading global bank. This brought together advice from across the globe on key data privacy issues including: basic data privacy requirements in each jurisdiction; banking secrecy, the interaction of data privacy and HR; CCTV and employee monitoring; IT organization, management and security; the use of personal data in marketing; the use of personal data on the internet and organizations' intranet; and cross-border transfers.
- Advising Hyundai and Kia in relation to global compliance work relating to ABC. As part of this process, lawyers from our offices in Seoul, Germany and Brazil, have conducted multiple anti-bribery and anti-trust compliance training sessions at Hyundai Motor and KIA Motors' plant locations around the world.

- o Acting as the Compliance Officer for a multi-billion dollar energy transportation company. This role involved conducting anti-bribery due diligence on numerous bidding entities and advising on the associated risk, advising on policies and procedures, training the Board and third parties and advising on measures required of contractors to ensure bribery risks were minimized as far as possible.
- o Advising an international insurance company, following a full scale and intensive review of the client's compliance framework and suite of policy documentation, on developing its Australian whistle-blower policy and to work with and train all of the key stakeholders (including the company's board and senior executives) on their obligations under the policy.
- o Continuing to provide a major pharmaceutical company with compliance counsel and assistance in further developing and honing the company's global compliance programs and processes - including as compliance counsel in an ongoing monitorship with the SEC.
- o Conducting a multi-jurisdictional compliance risk assessment and 'health check' for a FTSE 250 gambling company which covered: Anti-Bribery & Corruption, Anti-Money Laundering, Ethics, the Criminal Finances Act 2017, Responsible Gambling, and Human & Labour Rights. The risk assessment included a review of existing policies and procedures, multiple interviews across the business, and a compliance questionnaire. Our findings were then analyzed to produce a risk matrix, a heat map and a findings report. A multi-jurisdictional training program was then rolled out across the business which factored in the key learning points.
- o Assisting a leading Italian based multinational group in the oil, gas and power industry in updating the ex post (after the perpetration of a crime) organizational, management and control model, with a specific focus on safety rules, following legal issues relating to the kidnapping of four employees of the company in Libya.

INSIGHTS

Publications

China's Expanding Economic Sanctions Regime

31 March 2021

On March 22, 2021, the European Union (EU) and the governments of the US, Canada, and the UK concurrently imposed sanctions on individual Chinese officials and a Chinese entity based on findings of human rights violations in Xinjiang.

Representing individuals in interviews – the US perspective

30 March 2021

Determining whether to consent to an interview, and any interview itself, can be pivotal.

SEC interim final amendments signal stricter regulation on Chinese and other emerging market companies

29 March 2021

Under the new requirements, certain companies must establish that they are not owned or controlled by a foreign government entity and must disclose any foreign government influence.

The European Commission's new approach to ESG due diligence and corporate accountability

25 March 2021

This article sets out where the European Parliament stands on the proposed ESG Due Diligence law, key features of current proposals and a number of novel legal and commercial issues that businesses should consider engaging policy-makers on.

Blockchain and Digital Assets News and Trends

22 March 2021

[BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS](#)

Wyoming moves to clarify legal status of DAOs; court dismisses class action against a cryptocurrency exchange.

Blockchain and Digital Assets News and Trends

25 February 2021

[BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS](#)

Canada's AML regime amendments: is your interactive entertainment service or platform operating a "money service business"?

Corruption Perceptions Index 2020 - a regional perspective

11 February 2021

Last week Transparency International launched the 2020 edition of its Corruption Perceptions Index (CPI), which ranks 180 countries and territories by their perceived levels of public sector corruption, according to experts and business people, using a scale of zero to 100 (100 being very clean and zero being highly corrupt).

Something to Report: DLA Piper's latest film

28 January 2021

Something to Report is a 45-minute fictional corporate drama created as a training tool for directors, legal departments and management at companies around the world.

DLA Piper launches Compliance App

28 January 2021

DLA Piper has launched the Compliance Atlas app, a mobile solution built to meet the policy needs of modern-day companies.

Disputes, Issue 2

28 January 2021

[DISPUTES](#)

In this issue, we look at the split among the federal circuits over what it means to "exceed authorized access" in violation of the Computer Fraud and Abuse Act; the ways in which the federal courts apply the Supreme Court's recent limitations on equitable disgorgement; ways to mitigate liability risk in unauthorized financial transfers; considerations for employers as they develop policies regarding use of cannabis in their workforce; and the critical importance of escalation protocols in corporate whistleblower programs.

Six months after *Liu*: The SEC and disgorgement

28 January 2021

In the wake of *Liu*, several open questions are only now starting to work their way through the courts.

The missing link in whistleblower programs – the escalation protocols

28 January 2021

A fixed set of escalation protocols helps ensure that a whistleblower program functions efficiently.

Unauthorized financial transaction fraud: Mitigating liability risks

28 January 2021

Prudent financial institutions are seeking to protect themselves against liability for third-party fraud and accountholder carelessness.

When a threat actor strikes: Legal considerations and challenges in a ransomware attack

21 December 2020

Evidence suggests that having employees working remotely significantly increases the risk of a successful ransomware attack.

Blockchain and Digital Assets News and Trends

23 November 2020

[BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS](#)

IMF issues report on regulatory framework for CBDs and GSCs, SEC invites feedback on application of custody rule to digital assets.

SFO clarifies guidance on DPAs: Is the DPA model ready for take-off?

4 November 2020

On 23 October 2020, the Serious Fraud Office published a new chapter from its Operational Handbook which provides further guidance on the SFO's approach to Deferred Prosecution Agreements. Whilst the guidance does not introduce any major changes, it does provide clarity on the SFO's expectations of companies wishing to avoid prosecution.

Blockchain and Digital Assets News and Trends

21 October 2020

[BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS](#)

SDNY finds Kin token is a security; unpacking the DOJ's cryptocurrency guidance – plus latest legal, regulatory and case law developments.

Blockchain and Digital Assets News and Trends

21 August 2020

[BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS](#)

California appellate court affirms judgment for Coinbase in lawsuit over Bitcoin Gold – plus latest legal, regulatory and case law developments.

US moves forward on enhanced securities regulations focusing on Chinese companies

17 August 2020

Latest developments in US efforts to address the financial risks posed by emerging market companies.

Protecting the attorney-client privilege while under quarantine: Five tips for protecting attorney-client privilege when using online collaboration tools

22 June 2020

With the increase in remote working comes an increased opportunity for attorney-client privilege issues to surface.

Blockchain and Digital Assets News and Trends June 2020

18 June 2020

[BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS](#)

World Economic Forum announces Presidio Principles as a foundation of blockchain ecosystem design – plus latest legal, regulatory and case law developments.

World Economic Forum announces Presidio Principles as a foundation of blockchain ecosystem design

18 June 2020

WEF's foundational values for a decentralized future.

Chinese and other emerging market companies listed in the US face increased scrutiny from Congress and Nasdaq

27 May 2020

Within a span of two days, the US Senate, House and Nasdaq each took steps to safeguard investors in the US capital markets.

Blockchain and Digital Assets News and Trends

20 May 2020

[BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS](#)

California may limit application of securities laws to tokens, French court says bitcoins are fungible assets – plus latest legal, regulatory and case law developments.

California bill proposes limits on application of securities laws to tokens

20 May 2020

The proposed changes are likely to be well received by those considering issuing tokens.

COVID-19: Using technology to address compliance

13 May 2020

How can compliance routines be improved in a time of social distancing via technology?

Post-COVID-19 sustainability and ESG disputes: pinch points and practical pointers

12 May 2020

Where businesses are putting all of their efforts into crisis mitigation and survival in response to COVID-19, it is worth considering the importance of balancing short-term mitigation measures with the preservation of long term value and sustainability and ESG commitments

What compliance programs can do now to prepare for operations in the new COVID-19 reality

5 May 2020

Anticipating changes in the ABAC and compliance landscape to prepare for the lifting of social distancing mandates that have required non-essential businesses to close.

Post-COVID-19 Sustainability and ESG disputes: human rights commitments and key legal risk during times of crisis

5 May 2020

Maintaining a consistent approach to sustainability and human rights is not just the right thing to do during the COVID-19 crisis, but an important consideration to mitigate medium and long-term legal risks

Post-COVID-19: What to expect in the "next normal"

30 April 2020

Issues that are front of mind, based on an informal survey of some of the largest companies and most influential global business leaders.

COVID-19: conducting internal investigations in remote work settings

24 April 2020

For companies conducting internal investigations or responding to an investigation, practical solutions in a time of distancing.

Coronavirus: reopening businesses – compliance risks

24 April 2020

Companies looking to reopen are urged to do so in compliance with varying, changing government restrictions to avoid longer term liabilities that could potentially outweigh short term gains

Corporate commitment to compliance helps bank avoid FCPA charges despite alleged \$4.5M bribery scheme

24 April 2020

The SEC's complaint provides insight into what made the compliance program so effective that the individual's former employer avoided government sanctions.

Blockchain and Digital Assets News and Trends

23 April 2020

BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS

The FSB report on global stablecoin frameworks and related cryptoassets reflects views inside G20 governments – plus latest legal, regulatory and case law developments.

Investment adviser compliance in the COVID-19 pandemic – pay attention to valuation and strategy deviation issues

17 April 2020

Investment advisers still must comply with their obligations to maintain and implement fair pricing policies and procedures and follow their disclosed investment strategies.

COVID-19: A breeding ground for corruption – monitoring key risks

10 April 2020

US regulators are reminding US businesses that a crisis situation does not excuse a failure to address increased risks of bribery and corruption.

Cost-cutting considerations in the time of COVID-19 (Part 3 – employment issues outside the US)

7 April 2020

A deeper dive into various cost-saving measures and their viability for employers outside the US.

Coronavirus: Supplier due diligence for vetting Chinese medical suppliers for quality, safety, fair pricing and anti-corruption compliance

6 April 2020

Some key risks, and potential solutions to reduce cross-border operational risks.

Coronavirus COVID-19 - Corporate Governance Risks in Ireland

2 April 2020

This article discusses the commercial risks impacting business operations due to disruptions to the supply chain, changes to employee availability, the practicality of remote working and various governmental measures in place which may impede an organisation's ability to deliver products and services to its customers.

COVID-19 essential businesses: Anti-bribery and anti-corruption risks

31 March 2020

Given the significant impact of being deemed non-essential, businesses and employees are incentivized to ensure their business is deemed essential by local authorities – and this can pose anti-bribery anti-corruption (ABAC) risks to companies.

Coronavirus: Warning from SEC on insider trading highlights importance of disclosure controls during the COVID-19 pandemic

31 March 2020

A statement on March 23 warned that the SEC would be on heightened alert for signs of insider trading and other misconduct that might harm investors.

US Antitrust enforcers issue joint statement on competitor collaboration amid COVID-19 pandemic

27 March 2020

[ANTITRUST AND COMPETITION: NOVEL ISSUES IN A POST-CORONAVIRUS WORLD](#)

The US Department of Justice and Federal Trade Commission issued a Joint Antitrust Statement Regarding COVID-19, in which they announced an expedited procedure for evaluating proposed collaborations among competitors and other businesses working to address the pandemic.

Blockchain and Digital Assets News and Trends

25 March 2020

[BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS](#)

The age of viral outbreaks – key contract considerations in a post-COVID-19 world, plus latest legal, regulatory and case law developments around blockchain and digital transformation.

***US v. Hoskins*: in setback for DOJ, court grants post-trial motion for acquittal on all FCPA counts**

27 February 2020

The decision calls into question DOJ's aggressive approach to a narrow but significant class of potential defendants in FCPA cases.

Preventive Medicine: Official “Antimonopoly Compliance Guidelines for Business Operators” in China

10 December 2019

On 28 November 2019, the State Administration of Market Regulation (SAMR) released for public comment draft “Anti-Monopoly Compliance Guidelines for Operators” (the “Draft Guidelines”). These non-binding guidelines recommend measures for “business operators” subject to the Antimonopoly Law (AML) to develop and implement antitrust compliance programmes. The Draft Guidelines integrate prevailing best practices for international compliance programmes, while reflecting the unique challenges of

antitrust risk management in China.

Jury acquits foreign national in apparent rebuke of DOJ's attempt to police overseas corruption

4 December 2019

The result highlights some significant issues that may, in some cases, limit the ability of the DOJ to prosecute foreign nationals for corruption overseas.

Antitrust Matters - November 2019

18 November 2019

ANTITRUST MATTERS

We're pleased to share with you a new Edition of our periodical global publication Antitrust Matters

US Supreme Court denies review of *Robles v. Domino's Pizza*, opening door to more lawsuits on website and mobile app accessibility claims

16 October 2019

Does the ADA apply to websites and mobile apps?

Treasury Department proposes regulations comprehensively implementing FIRRMA and reforming CFIUS national security review

19 September 2019

The proposed regulations affect non-controlling investments involving critical technologies, critical infrastructure, and sensitive personal data; and transactions involving real estate near sensitive national security facilities.

Brexit for the insurance sector: No-deal regimes in the UK and Europe

17 September 2019

INSURANCE HORIZONS

This guide has been prepared by DLA Piper's insurance regulation team to provide a high level overview of post-Brexit regimes that are being implemented in key EU markets, and in the UK. It is intended to help insurers and intermediaries with their planning in the run up to a possible no-deal Brexit.

FTC announces Cambridge Analytica settlement

25 July 2019

A sign that the FTC may be stepping up its pursuit of individual liability in addition to corporate liability.

Updated FATF standards include interpretative note on virtual assets

16 July 2019

The FATF updates its anti-money laundering and counter-terrorist financing standards.

Proposed amendments to Canada's anti-money laundering regulations aim to close loop holes

15 APR 2019

Long-awaited amendments to Canada's anti-money laundering regulations are set to come into effect this coming fall. A number of deficiencies in the regulations had been previously identified in reports by inter-governmental agency, the Financial Action Task Force, and the US State Department.

DLA Piper's 2016 Compliance & Risk Report: What CCOs need to know

19 APR 2016

Mexico's new National Anticorruption System: 7 key points

20 JUL 2015

Constitutional reform regarding the creation of the National Anticorruption System

Third parties: 4 FCPA takeaways for working with distributors

24 SEP 2014

Four key challenges and related "cures"

NEWS

DLA Piper launches Aiscension to help detect and prevent cartel activity in collaboration with Reveal

15 March 2021

- New offering delivers cutting-edge technology from *Reveal* alongside DLA Piper's first-class legal know-how
 - Time and cost savings allow for companies to focus on detection
 - Faster, more effective and better value than traditional technology assisted and manual reviews
-

DLA Piper advises lenders on the refinancing of the Warnow Tunnel in Germany

26 February 2021

DLA Piper has advised the lenders on the EUR115 million refinancing of the Warnow Tunnel in Rostock (Germany), also known as the Warnow River Crossing (Warnowquerung).

DLA Piper advises Kölner Pensionskasse and Caritas Pensionskasse on their reorganization

21 January 2021

DLA Piper hat die Kölner Pensionskasse und die Pensionskasse der Caritas aufsichtsrechtlich gegenüber der Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), bei der Gestaltung und Umsetzung des Sanierungskonzepts sowie bei dem damit verbundenen formellen Gang in den Status der Liquidation beraten.

DLA Piper advises Wipro Limited on the acquisition of METRO-NOM GmbH and METRO Systems Romania

4 January 2020

DLA Piper has advised Wipro Limited, a leading global information technology, consulting, and business process services company, on the acquisition of METRO AG's IT units – METRO-NOM GmbH in Germany and METRO Systems Romania S.R.L.

DLA Piper advises Nemetschek on acquisition of DEXMA by subsidiary Spacewell

18 December 2020

DLA Piper has advised the Nemetschek group, one of the world's leading software providers for the Architecture, Engineering, Construction and Owner-operated (AECO) industry, on the acquisition of 100% of the shares in DEXMA by its subsidiary Spacewell.

DLA Piper advises Stillfront Group on the acquisition of gaming company Sandbox Interactive

18 December 2020

DLA Piper has advised Stillfront Group AB, a leading free-to-play gaming studios company, on the acquisition of Sandbox Interactive GmbH, a rapidly growing and highly profitable gaming company based in Berlin and developer and publisher of the popular cross-platform free-to-play sandbox MMORPG Albion Online. The sellers are the four co-founders of Sandbox.

DLA Piper wins TMT Finance M&A Global Telecom Deal of the Year

8 December 2020

DLA Piper is pleased to announce that they have received the TMT Finance M&A Global Telecom Deal of the Year for their representation of T-Mobile and Deutsche Telekom in the T-Mobile-Sprint merger.

'Industry standard' for use of arbitration platforms moves a step closer as pan-firm collaboration receives support

30 November 2020

Plans to standardise the approach to online case management in international arbitration are a step closer to reality, after a draft protocol received positive feedback from an industry-wide consultation.

DLA Piper advise Liverpool Football Club on sponsorship claim defence

14 September 2020

DLA Piper has successfully represented The Liverpool Football Club and Athletics Grounds Limited (LFC) in defending a GBP1.13 million claim brought by sports intermediary Winlink Marketing Limited.

DLA Piper arbitration practice recognized as world leading by Global Arbitration Review

14 July 2020

DLA Piper has been recognized once again as having one of the world's leading international arbitration practices.

Law firms collaborate on industry first to accelerate tech adoption in international arbitration

2 July 2020

DLA Piper is amongst six international law firms which have developed a Protocol to help deliver a globally consistent approach to the use of online case management platforms in international arbitration.

DLA Piper announces partnership promotions for 2020

30 April 2020

DLA Piper is proud to announce that 67 lawyers have been promoted to its partnership. The promotions are effective as of April 1, 2020 in the United States and May 1, 2020 for EMEA and Asia Pacific. The promotions have been made across many of the firm's practice areas in 35 different offices throughout 13 countries.

Across the firm's practices globally, Corporate saw the largest intake of new partners with 19 promotions, followed by Litigation and Regulatory with 15. Intellectual Property and Technology and Finance and Projects had ten and eight promotions respectively, while there were six in Real Estate. Tax and Employment both had four, and there was one in Restructuring.

DLA Piper lawyers named Acritas Stars

10 March 2020

Acritas has named over 200 DLA Piper lawyers as 2020 Acritas Stars. Now in its fourth year, Acritas Stars highlights the stand-out lawyers in private practice as nominated by clients around the world. More than 3,000 senior in-house counsel feed into the nomination process to give a comprehensive view of highly recommended lawyers across the globe.

DLA Piper appoints Head of Global Government Affairs team

6 March 2020

DLA Piper announces the strengthening of its Global Government Affairs team with the appointment of Richard Sterneberg who will head up the team in its Brussels office. Richard brings with him over 20 years of experience working in Brussels as a global government affairs expert.

DLA Piper launches its Global Litigation Guide

3 December 2019

DLA Piper has launched its 'Global Litigation Guide', which covers aspects of civil litigation in 30 jurisdictions worldwide.

DLA Piper continues to boost CEE region capability with new hires in Poland

5 September 2019

DLA Piper today announces the appointment of eight new lawyers in its Warsaw office into three key practice areas of Corporate, Finance & Projects (F&P) and Litigation & Regulatory. These hires follow the recent appointment of corporate partners Marek Sawicki and Jakub Marcinkowski from CMS.

DLA Piper announces launch of Artificial Intelligence practice

14 MAY 2019

DLA Piper announced today the launch of its Artificial Intelligence practice, which will focus on assisting companies as they navigate the legal landscape of emerging and disruptive technologies, while helping them understand the legal and compliance risks arising from the creation and deployment of AI systems.

DLA Piper establishes Litigation Regulatory offering in Dublin with partner hire

18 APR 2019

DLA Piper today announces the appointment of Caoimhe Clarkin as a Litigation & Regulatory partner in the firm's Dublin office. This is the seventh partner hire for DLA Piper in Dublin this year.
