

Original Paper

Research on Corporate Commercial Bribery Offenses from a Criminal Compliance Perspective

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Abstract

Against the backdrop of expanding global economy and intensifying market competition, corporate commercial bribery has become increasingly prevalent. This illegal act severely undermines the fair market competition order, tarnishes corporate reputations and destabilizes society. Violating laws as well as business ethics and integrity, commercial bribery has evolved into a major barrier to sound corporate development and sustained socioeconomic progress. It is therefore urgent to figure out effective ways to curb and prevent such crimes.

As an innovative concept and management tool for modern enterprises, criminal compliance has drawn growing attention for its role in preventing and cracking down on corporate commercial bribery. By establishing and refining compliance systems to standardize corporate operations, criminal compliance ensures business activities abide by legal rules and ethical norms, and effectively lowers legal risks for enterprises.

This paper discusses the current situation, causes, characteristics and harms of corporate commercial bribery crimes from the perspective of criminal compliance. Combined with domestic and foreign real cases, it analyzes the functions and practical applications of criminal compliance in preventing and governing commercial bribery. The study also puts forward targeted strategies and suggestions for crime prevention, aiming to provide practical references for enterprises to build robust criminal compliance systems.

Governments, enterprises and all sectors of society need to make joint efforts to tackle corporate commercial bribery. Through tighter legal supervision, improved institutional arrangements and enhanced corporate culture, we can work together to build a market environment featured with integrity, fairness and good order.

Keywords

unit crime, commercial bribery, corporate compliance, criminal compliance

1. Introduction

1.1 Research Background

Driven by economic globalization, enterprises are now operating in an increasingly complex business landscape and facing mounting legal challenges. Corporate commercial bribery, an improper practice that undermines fair competition, damages corporate reputation and erodes public trust, has caught extensive attention across the world. A string of high-profile commercial bribery cases exposed in recent years has pushed corporate compliance management onto the spotlight globally.

Nowadays, commercial bribery is carried out in increasingly covert and sophisticated ways, making it far more difficult to investigate and penalize relevant crimes. Meanwhile, inadequate compliance management within enterprises is a major cause for the frequent occurrence of commercial bribery.

As a modern approach to corporate compliance management, criminal compliance helps standardize business practices by establishing complete compliance systems, keeps corporate operations in line with laws and ethics, and effectively reduces the incidence of commercial bribery. The introduction of criminal compliance provides enterprises with a new perspective to identify and defuse commercial bribery risks, and brings new ideas to corporate compliance governance.

Nevertheless, domestic research on corporate commercial bribery crimes under the framework of criminal compliance is still insufficient, lacking systematic theoretical frameworks and practical experience. On this account, this paper analyzes the causes, characteristics and rules of corporate commercial bribery crimes, and explores the role and operating mechanism of criminal compliance in preventing such crimes. It aims to offer theoretical support and practical guidance for corporate compliance management, and build a platform for all parties to discuss the governance of commercial bribery, so as to mobilize joint forces to prevent and crack down on such illegal acts.

1.2 Significance of the Topic

China's corporate compliance reform has undergone two years of pilot implementation, covering an expanding range of cases. Even so, the pilot work still faces prominent problems: the legal basis for lenient treatment and exemption from prosecution in compliance reform is inadequate; practical operations deviate from the original purpose of the compliance system; the applicable charges and coverage are limited, and some local practices have even broken the bounds of the rule of law.

The operation of the corporate criminal compliance system is inseparable from substantive legal provisions and the analysis of imputation rules for unit crimes. Only by consolidating the theoretical foundation of the compliance system can we ensure the steady advancement of this reform.

Starting from the theoretical and practical dilemmas of corporate commercial bribery crimes and the compliance system, this paper studies how criminal law can support the reform of corporate anti-commercial bribery compliance. It seeks to curb corporate commercial bribery effectively, foster a

sound business environment, and facilitate the stable and orderly development of private enterprises in China.

2. Overview of Corporate Commercial Bribery Offenses

2.1 Definition and Elements of Commercial Bribery Offenses

Corporate commercial bribery crimes refer to improper competition acts committed by business operators. In the course of trading goods or providing services, operators offer bribes in cash or other forms to relevant units or individuals, so as to seize trading opportunities, squeeze out competitors and seek improper economic benefits.

In terms of subject qualification, the perpetrator of commercial bribery must be a business operator, including legal persons, other economic organizations and individuals engaged in commodity trading or profit-making service industries. Subjectively, perpetrators intend to gain trading advantages, eliminate competitors and obtain improper economic benefits in business activities. This subjective intent distinguishes commercial bribery from other types of bribery. Objectively, perpetrators secretly offer money or other benefits to relevant units or individuals to conduct bribery.

Commercial bribery infringes upon the fair competition order of the market and the legitimate rights and interests of other operators. It disrupts the fair trading environment, harms consumer interests and shakes the social integrity system. Such acts violate not only the Anti-Unfair Competition Law and other relevant regulations, but also criminal law provisions on bribery crimes and bribery of non-state staff.

2.2 Forms of Commercial Bribery Offenses

2.2.1 Rebates

A rebate means one party returns part of the commodity price to the other party as a hidden benefit in a transaction. Illegal rebates differ from legitimate discounts: legitimate discounts are explicitly offered and fully recorded in corporate accounts, while illegal rebates are conducted in secret and often concealed through off-book accounting or falsified financial records. Even if recorded under the name of “discount”, the act cannot be deemed legal if the party offering the rebate gains improper competitive advantages and disrupts normal business order.

In practice, rebates are often transferred through intermediaries such as public relations companies and conference service providers, or paid to remote or overseas companies with close ties to the recipient to cover up the bribery.

For instance, in a case involving Jingzhou Maternal and Child Health Hospital, the hospital charged standard medical fees to patients, who paid for lens products either directly or through hospital ophthalmology staff. After purchasing lenses from a local distributor surnamed Zhang, an ophthalmologist deducted 30% of the total payment as a rebate, and settled the remaining 70% with Zhang via cash or bank transfer.

2.2.2 Cash Payment

To leave no evidence, parties involved in commercial bribery often choose one-on-one cash handovers, with no third-party evidence to verify the facts. In the unit bribery case involving Jiang heard in 2019, Jiang invited the recipient Liu to a dinner, and later placed a bag containing 360,000 yuan in cash in the trunk of Liu's car. The two parties completed another bribery deal of 100,000 yuan in cash wrapped in old newspapers in the same way.

In judicial practice, the confessions of the two parties are usually used as evidence against each other. The briber's statement is taken as witness testimony in the trial of the recipient, and vice versa. This practice has obvious legal flaws and weak probative force. First of all, bribery and accepting bribes constitute joint crimes, so the statements of both sides belong to the confessions and statements of criminal suspects and defendants, which alone cannot support a conviction. In addition, the two parties have direct interest conflicts, and their untested statements carry low evidentiary value.

2.2.3 Transactions at Prices Deviating Greatly from Market Rates

Transactions at obviously higher or lower prices than the market level, though seemingly voluntary, are essentially covert bribery that runs against normal market rules. The judicial interpretations issued by the Supreme People's Court and the Supreme People's Procuratorate have clearly regulated such acts.

In a 2018 case, Xingtong Company sold multi-storey residential buildings in group purchase, while villas were not included in group purchase activities. A person named Yan bought a villa and an underground parking space at 2,500 yuan per square meter, while the prevailing market price stood at 4,150 yuan per square meter. Later, Yan asked his nephew to purchase another villa and parking space in a false name at 3,000 yuan per square meter, far below the market price of 4,800 yuan per square meter.

2.2.4 Other Forms of Bribery

There are various other financial bribery means, including fabricating or exempting debts, providing interest-free or low-interest loans against market rules, and transferring funds in the name of advertising commissions, sponsorship fees, labor service fees and consulting fees. Other common practices include reimbursing various expenses for the recipients, conducting bribery through commodity transactions, disguising bribes as shareholder dividends, setting up shell companies to receive illicit funds, and offering excessive investment returns or fake lottery prizes. Some perpetrators even take bribes through gambling or arrange fake jobs in their companies to pay salaries for recipients. Non-financial bribery is also prevalent, such as arranging children's admission to schools and employment opportunities, providing free luxury travel and inspection tours, and offering improper honors and professional qualifications for the recipients.

2.3 Harms and Impacts of Commercial Bribery Crimes

Commercial bribery brings extensive and far-reaching harms to the whole society. It destroys the basic order of fair market competition and triggers a series of negative social consequences.

From the perspective of market operation, fair competition is the cornerstone of a sound market economy. Commercial bribery allows enterprises to gain competitive edges through improper means, turning market competition based on product quality, price and service into a game of bribery and personal connections. This leads to distorted resource allocation, abnormal commodity prices and declining service quality, and severely impairs the efficiency of market operation.

In terms of national fiscal revenue, commercial bribery causes massive tax losses. Bribers often falsify accounts and inflate costs to evade taxes, while recipients hide illicit gains off the books. This weakens national fiscal capacity and hinders the improvement of public services and infrastructure construction.

Commercial bribery also damages the credibility of government authorities. Many such cases involve government staff, whose corrupt conduct erodes public trust in the government and may even trigger social unrest. Moreover, commercial bribery is closely linked to embezzlement, money laundering and other crimes, disrupting the rule of law and widening the gap between the rich and the poor.

Furthermore, commercial bribery hinders the transformation of government functions. Frequent illegal acts force government departments to strengthen market intervention, holding back the shift toward a service-oriented government. It also reduces the efficiency of public fiscal spending, intensifies social contradictions and impedes the construction of a harmonious society.

3. The Institutional Foundation of Corporate Criminal Compliance with Anti-Bribery Laws

3.1 The Negative Effects of Criminal Sanctions for Corporate Bribery

3.1.1 Disruption to Normal Business Operations of Enterprises

Once an enterprise is subject to criminal sanctions for commercial bribery, its daily operation will suffer severe blows. A criminal conviction will seriously damage corporate reputation, make partners and customers lose trust, and result in the loss of market resources.

Criminal penalties such as fines and confiscation of illegal gains will increase corporate financial burdens and put pressure on cash flow and profitability. For small and medium-sized enterprises with fragile financial status, such blows may be fatal and even lead to bankruptcy. In addition, corporate scandals will dampen employees' morale, reduce work enthusiasm, trigger personnel turnover and internal conflicts, and further weaken corporate competitiveness.

Over 90% of enterprises in China are private businesses. Unlike state-owned enterprises with stable policy and resource support, most private enterprises lack external backing. Once hit by criminal sanctions, they are hardly able to sustain normal operations and tend to go bankrupt.

Most private enterprises do not have sound internal supervision mechanisms such as Party organizations and trade unions. Their management selection, assessment and training systems are loose, and they lag behind foreign-funded enterprises in establishing anti-bribery awareness and compliance systems. Weak internal governance makes private enterprises more vulnerable to commercial bribery crimes.

Besides, China's market economy developed at a rapid pace in the early stage, with insufficient experience in corporate supervision. Many small and medium-sized local enterprises were founded with weak awareness of lawful operation, which has left hidden troubles for illegal acts. Combined with institutional defects, commercial bribery has become a prominent problem among domestic private enterprises.

3.1.2 Collateral Damages to Innocent Stakeholders

Criminal sanctions on enterprises involved in commercial bribery will bring incidental losses to a large number of innocent stakeholders. The affected parties cover employees, business partners, suppliers, investors, shareholders and consumers.

For enterprise employees, the tainted reputation of the company will affect their career development and social evaluation, and even bring difficulties in job hunting afterwards.

For cooperative enterprises and suppliers, the breakdown of cooperation and disrupted supply chains will directly affect their normal operation. Long-term business partners will also face operational fluctuations due to the adverse impact on the convicted enterprise.

Investors and shareholders will suffer direct economic losses from falling stock prices and shrinking corporate market value. As for consumers, they may end up buying shoddy and overpriced goods and services, with their legitimate rights and interests violated.

3.1.3 Failure of Penalties to Perform Crime Prevention Functions

Criminal sanctions have limited deterrent effects on commercial bribery crimes. On the one hand, the covert and complex nature of commercial bribery makes investigation and conviction difficult, which greatly weakens the deterrence of criminal punishment. On the other hand, such crimes usually involve multiple parties, and the mentality of "no punishment for all offenders" makes potential perpetrators take chances.

Commercial bribery is often initiated by senior management of enterprises. Imposing criminal penalties on senior staff will trigger internal unrest and damage corporate reputation and market position. More importantly, simple criminal punishment cannot fundamentally solve the problem. Driven by profit, enterprises will constantly adjust transaction modes and business structures to evade legal sanctions. As a result, penalties fail to achieve the goal of preventing crimes from the source.

Criminal sanctions may also cause negative public opinions and damage national external image, further weakening the preventive effect of criminal penalties on commercial bribery.

3.2 *Legitimacy of Corporate Criminal Compliance against Commercial Bribery*

3.2.1 Compliance as a Regulative Alternative rather than Connivance at Crimes

Corporate anti-commercial bribery compliance emphasizes the important role of internal governance in crime prevention, and encourages enterprises to reduce legal risks through standardized operation. As an effective corporate governance model, a sound compliance system requires enterprises to abide by laws and business ethics, and improve internal control and risk management mechanisms. It helps prevent illegal acts, enhance corporate transparency and credibility, and strengthen core

competitiveness.

When an enterprise is suspected of commercial bribery, a sound compliance system can serve as an important basis for discretionary conviction and sentencing. Enterprises with complete compliance mechanisms can take the initiative to discover and rectify illegal acts, mitigate the consequences of crimes, and communicate effectively with law enforcement authorities to reduce legal risks.

It must be clarified that corporate compliance never means indulging crimes. On the contrary, it requires enterprises to take the initiative to assume the responsibility of crime prevention, improve internal control systems, and actively cooperate with judicial investigations and accept legal sanctions once illegal acts occur.

3.2.2 Procedural Arrangements for Separating Liabilities of Enterprises and Entrepreneurs

Natural persons are the actual implementers of corporate will and behaviors. It has always been a difficult judicial issue to distinguish between corporate acts and personal criminal acts, especially in domestic private enterprises where owners usually hold management positions. In such enterprises, corporate decisions and personal behaviors are often intertwined and hard to tell apart.

A well-designed anti-commercial bribery compliance program provides an effective solution to this problem. It sets clear standards to distinguish between acts of entrepreneurs and corporate behaviors, and demonstrates the enterprise's firm stance against corruption through standardized governance and operational rules.

If an enterprise has formulated and strictly implemented an anti-bribery compliance program, with clear prohibitions, risk prevention, reporting and punishment mechanisms in place, it has fulfilled its due management obligations. Under such circumstances, if individual managers or employees violate compliance rules and commit commercial bribery, their acts shall be deemed personal conducts rather than the expression of corporate will, and the enterprise shall not bear corresponding criminal liabilities.

It is worth noting that the standard for judging whether an enterprise has fulfilled its management duties should be reasonable and practical. A complete compliance system can greatly reduce the risk of internal bribery, but it is unrealistic to require enterprises to completely eliminate all illegal acts. As long as an enterprise has taken reasonable preventive measures in line with operational reality, it should not be held excessively liable for individual employees' violations.

3.2.3 Considerations for Protecting Innocent Stakeholders

Proper application of the compliance system can avoid excessive criminal proceedings against enterprises involved in bribery, maintain normal corporate operation, stabilize employment and guarantee economic development. Corporate anti-bribery compliance protects consumers, investors and market players from unfair competition and illegal gains, restrains improper business activities that harm public interests, and reduces the negative external effects brought by criminal proceedings.

Criminal penalties are necessary to punish and deter commercial bribery crimes, but judicial authorities need to control the intensity of punishment to avoid pushing law-breaking enterprises into bankruptcy and causing extensive social losses. The corporate compliance system offers a flexible solution for judicial practice.

Judges and prosecutors can take multiple factors into consideration, including the subjective malice of the enterprise, social impacts of the crime, cooperation in investigation and the operation effect of the compliance system. For enterprises with sound and effectively operated compliance systems, mitigated punishment or deferred prosecution can be applied. This approach can punish illegal acts while keeping enterprises running normally, prevent mass unemployment and losses of investors, and balance legal effects and social effects to the maximum extent.

4. Restructuring the Legal Regime of Unit Bribery Crimes under Criminal Compliance

4.1 Clarify the Criminal Functions of Corporate Anti-commercial Bribery Compliance through Legislation

To restructure the legal regime of unit bribery crimes under the framework of criminal compliance, the first step is to define the criminal functions of corporate anti-commercial bribery compliance through clear legislative provisions.

Legislation needs to clarify the legal status of corporate compliance programs. Relevant laws shall stipulate explicitly that establishing and effectively implementing anti-commercial bribery compliance systems can help enterprises reduce criminal liabilities when their staff commit bribery crimes. Such provisions will motivate enterprises to invest more in compliance construction and elevate the overall business ethics of the whole society.

Meanwhile, laws shall set up evaluation criteria for the effectiveness of compliance programs. When an enterprise is accused of commercial bribery, it can claim mitigated liabilities if it can prove that its compliance system is complete and it has performed reasonable supervision duties. A standardized evaluation mechanism will push enterprises to continuously optimize compliance programs and improve the capacity to guard against commercial bribery risks.

In addition, legislation shall establish corresponding incentive and restraint mechanisms. Incentive policies and mitigated penalties can be offered to enterprises with sound compliance systems, while stricter sanctions shall be imposed on enterprises that refuse to build or effectively implement compliance rules. Clear legal provisions will provide a solid basis for judicial practice and curb commercial bribery from the source.

4.2 Build a Rigorous Criminal Legal Network

There are still loopholes in China's current legal system targeting commercial bribery crimes, such as the absence of the crime of unit bribery introduction and explicit charges for bribery involving foreign public officials and staff of international public organizations. To improve the criminal legal system, we need to fill these legislative gaps, strengthen the identification of commercial bribery risks, and

increase criminal accountability for perpetrators, so as to enhance the deterrent effect of criminal law. At present, the criteria for setting penalties for commercial bribery crimes are inconsistent. Penalties are formulated based on infringed legal interests, crime types or the identity of perpetrators in different cases, which violates the principle of suiting punishment to crime and weakens the deterrent effect of criminal sanctions.

The penalty system for legal persons also needs further improvement. Currently, fines are almost the only form of punishment for corporate crimes, without tiered standards based on specific circumstances. We can set differentiated fine standards according to the type of bribery, severity of circumstances, social impacts and the presence of effective compliance systems within enterprises.

Moreover, qualification penalties can be introduced for corporate offenders. In light of the severity of crimes, authorities may impose restrictions on corporate management power, order mandatory compliance rectification, partially suspend business rights, or ban enterprises from engaging in specific commercial activities. For enterprises that commit serious bribery crimes, relevant criminal departments can be shut down, and their business qualifications can be revoked. Tiered and diversified penalties can crack down on commercial bribery in a targeted manner and provide clear guidance for enterprises to operate in compliance with laws.

4.3 Formulate Guidelines for Corporate Anti-commercial Bribery Compliance Programs

Drawing on mature international experience, procuratorial organs and judicial authorities in China can take the lead in formulating unified guidelines for corporate anti-commercial bribery compliance programs. Industry associations and professional third-party institutions can first draft industry-specific rules according to operational characteristics, which will then be reviewed and finalized by judicial organs.

The guidelines shall specify the core contents of qualified anti-commercial bribery compliance programs and unified evaluation standards for their effectiveness. Most small and medium-sized enterprises lack interdisciplinary professional capabilities covering company law, criminal law and corporate management, making it difficult for them to independently build complete compliance systems. Guidelines formulated by judicial authorities can reduce the cost of compliance construction for enterprises and improve the overall implementation efficiency of the anti-bribery compliance system.

The guidelines shall be flexible and adaptable to enterprises of different scales and from various industries, instead of setting overly rigid unified standards. Meanwhile, appropriate discretionary power shall be granted to front-line judicial staff to assess the completeness and actual effect of corporate compliance systems based on the specific conditions of each case.

When judging the effectiveness of a compliance program, we should abandon the overly harsh result-oriented standard. It is unfair to define a compliance system as ineffective merely because isolated bribery acts occur occasionally. A reasonable evaluation standard should focus on the rationality of system design and implementation. As long as an enterprise has adopted feasible

measures to effectively reduce internal bribery risks within its capacity, its compliance program shall be recognized as effective.

The guidelines need to establish quantifiable evaluation frameworks, so that judicial authorities can assess the operation of corporate compliance systems in a scientific and reasonable way, and encourage enterprises to take the initiative to improve anti-commercial bribery compliance construction.

5. Conclusion

In the new era, corporate anti-commercial bribery criminal compliance has become an important part of national governance modernization and modern corporate internal governance. Localizing this advanced governance concept in China, optimizing the law-based business environment, and promoting law-based corporate governance are of great significance to the steady development of the national economy.

Nevertheless, the localization of corporate anti-commercial bribery criminal compliance still faces multiple challenges: insufficient legal basis for exemption from prosecution based on compliance, deviation from the core idea of “lenient treatment for enterprises and severe punishment for individual perpetrators”, and limited applicable charges and coverage scope.

A fully functional anti-commercial bribery compliance system is the core of criminal compliance reform and corporate self-governance. Enterprises need to establish sound financial reporting and audit mechanisms, improve internal control procedures, and formulate comprehensive post-incident remediation plans. Effective internal control can identify bribery risks in a timely manner, report illegal acts and optimize operational processes.

It is necessary to introduce third-party supervision and evaluation mechanisms into compliance construction. Professional third-party institutions can provide targeted suggestions to improve the efficiency of system building, and assist procuratorial organs in conducting supervision and acceptance of compliance rectification. This can make up for the lack of professional business knowledge among judicial staff and prevent abuse of power.

It is believed that with the continuous improvement of the criminal compliance system, corporate commercial bribery crimes will be effectively controlled, and the market order and economic development of China will move toward a healthier and more standardized direction.

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