List of Sanctions and Accompanying Measures

The following elements may be used to complement regulations with regard to sanctions and accompanying measures. The elements can be used both to establish sanctions that apply automatically by virtue of the law and to give authorities or courts/tribunals discretionary powers.

The list was in the first round drawn up on the basis of model laws developed by the Regulatory Institute (www.howtoregulate.org) because these model laws integrate regulatory knowledge from many jurisdictions and sectors alike. They therefore provide an excellent international and cross-sectoral basis. It was entirely drawn up by various artificial intelligence programmes, known as Large Language Models (LLMs)¹. It is the result of a long series of instructions and tasks that took the human in charge several days to complete, whilst the document was only marginally revised by humans.

Namely the LLM interface Perplexity² has in many cases suggested additional very sensible rules based on regulations that have been sifted through around the world. In doing so, Perplexity continued the Regulatory Institute's approach of learning from regulators in all sectors around the world and making the knowledge gathered available globally and across sectors. It is this approach that has been continued by regulatory practitioners supporting the Regulatory Institute who manually redacted the text to a modest extent. Finally, it has been presented to members of the artificial intelligence working group of the Commonwealth Association of Legislative Counsel. The document is therefore the result of four rounds of international gathering of regulatory knowledge. Feel free to suggest further improvements.

We asked the LLMs to provide their references. The elements, and therefore the references, come from legislation all over the world. The letters "ML" stand for "Model Law of the Regulatory Institute". You can therefore find the relevant model law provisions via this website: https://www.howtoregulate.org/category/ri-model-laws/.

The list overlaps slightly with the parallel list of powers and obligations which is recommended as an extension for cases where this list of sanctions and accompanying measures is not considered sufficient³. The difference between the two lists is that this list pursues the goal of compliance only indirectly via sanctions, whereas the list of powers and obligations is aiming at directly ensuring compliance. Both lists complement the document "Cross-sectoral standard provisions for regulation", which already contains some basic sanctions and accompanying measures. The document "Cross-sectoral standard provisions for regulation" also contains an Annex / Chapter dealing with procedural and side-aspects of civil / administrative sanctions. Hence the two documents should be read together, they go hand in hand.

¹ By far the best performing LLM for extracting elements from the Regulatory Institute's model laws was Claude Sonnet 3.5 (Anthropic). By far the best performing LLM for completing the list with examples from the internet was Perplexity. However, some contributions were made by Chat GPT 40, Deepai and Mistral.

² Strictly speaking, Perplexity is not an independent LLM, but an interface that builds on various LLMs.

³ In theory, any kind of obligation can be imposed to sanction a person.

Despite many deletions, the list might still contain some redundancies. We also feel that the order of the elements could still be improved. Finally, we are concerned that some of the references might not be correct or do not contain a sanction or accompanying measure, but only an obligation that could also be imposed as a sanction. Despite these flaws, the list can already be used to make draft legislation more complete in terms of sanctions. This is the list's sole purpose.

A Classic (Imprisonment and Monetary) Penalties:

Basic types:

- 1. Impose imprisonment for a specified period. [ML Corruption, Section 45.I.1; ML Alcohol-Cannabis-Tobacco, Section 23.I.1; ML Animal Protection, Section 80.III.a; Indian Prevention of Corruption Act, 1988, Section 13(1)(a); Japanese Tax Law (Law No. 228 of December 30, 1950), Article 64]
- 2. Impose fines based on a fixed amount or percentage of annual income/turnover. [UK Bribery Act, Section 7(3); ML Corruption, Section 45.I.1; ML Alcohol-Cannabis-Tobacco, Section 23.I.1; ML Animal Protection, Section 80.II.a; ML Corruption, Section 45.II.1]
- 3. Double the sanction in case of repetition of the same type of deliberate or unintentional infringement. [ML Animal Protection, Section 80.I, Section 80.II]
- 4. Impose fines up to a certain amount for each individual violation of environmental regulations. [US Clean Air Act, Section 7410(a)(2)]
- 5. Impose a daily fine up to a certain amount for each day of ongoing non-compliance [Pakistan Environmental Protection Act,1997, Section 26; Mexican Federal Law on Environmental Matters Ley Federal de Protección al Medio Ambiente), Article 145; EU General Data Protection Regulation (GDPR), Article 83]
- 6. Impose adequate interest rates for all financial sanctions and obligations [ML Animal Protection, Section 80.IV.h]
- 7. Apply multipliers to fines based on the severity of the offense [U.S. Federal Sentencing Guidelines, Chapter 8;
- 8. Extend sanctions and side measures to parent or subsidiary companies, other legal or natural persons, and their staff if they controlled the infringing person to the extent that they were in reality responsible for the infringement [U.S. Foreign Corrupt Practices Act, Section 30A; ML Animal Protection, Section 80.V; ML Corruption, Section 45.VI]
- 9. Impose sanctions for negligently financing or otherwise supporting an act that constitutes an offense [U.K. Bribery Act, Section 7; ML Corruption, Section 22.I]

Specifically for non-fulfilment of reporting and similar compliance obligations:

- Impose sanctions for knowingly circumventing or failing to implement a system of internal controls [U.S. Foreign Corrupt Practices Act, Section 13(b)(2)(A); ML Corruption, Section 22.III]
- 11. Impose sanctions for knowingly falsifying any book, record, or account relevant for an offense [U.S. Foreign Corrupt Practices Act, Section 13(b)(2)(B); ML Corruption, Section 22.IV]
- 12. Impose sanctions for destroying documents, data or other means of proof relevant for an offense [U.S. Sarbanes-Oxley Act, Section 802; ML Corruption, Section 22.V]
- 13. Impose sanctions for failure to report known offenses within one's sphere of responsibility [U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 922; ML Corruption, Section 22.II]

Incentives used in relation to classic penalties:

- 14. Deferred prosecution agreements: These allow organisations and persons acting for them to avoid criminal charges by agreeing to implement compliance reforms and pay fines [U.S. Department of Justice's Corporate Enforcement Policy]
- 15. Reduction of fines if paid within a shorter deadline.
- 16. Probation period plus suspended prison sentence instead of immediate prison sentence, subject to conditions, e.g. regular reporting to a probation officer, restrictions on travel [U.S. Sentencing Guidelines Manual § 5B1.1]

More of the same⁴:

- 17. Fine up to \$1.7 million for violations of anti-money laundering regulations.

 [Australian Anti-Money Laundering and Counter-Terrorism Financing Act 2006, Section 11(2)]
- 18. Fine up to €5 million or imprisonment up to 5 years for environmental pollution[EU Environmental Crime Directive, Article 10]
- 19. Fine up to CAD 50,000 per day for non-compliance with Canadian environmental regulations under the Canadian Environmental Protection Act, 1999, Section 32(1).
- 20. Imprisonment up to 20 years for organized crime offenses [Russian Criminal Code, Article 210]
- 21. Fine up to ZAR 10 million for environmental pollution [South African Environmental Conservation Act, No. 73 of 1989, Section 24E]
- 22. Fine up to €20 million for cartel conduct [EU Cartel Regulation (Council Regulation (EC) No 1/2003), Article 23(1)]
- 23. Fine up to ¥500 million for antitrust violations [Japanese Antimonopoly Act (Act No. 54 of April 14, 1947), Article 7]
- 24. Imprisonment up to 10 years for price-fixing offenses [Australian Competition and Consumer Act 2010, Section 44ZZRF]
- 25. Fine up to NZD 10 million for anti-competitive behavior [New Zealand Commerce Act 1986, Section 36]
- 26. Imprisonment up to 5 years for illegal logging offenses [Brazilian Forest Code (Law No. 4,771 of September 15, 1965), Article 58]
- 27. Imprisonment up to life for terrorism offenses [Chinese Criminal Law (Law No.97 of July 1, 1979), Article 120]

B. Alternatives to classic imprisonment and monetary sanctions:

- 28. Assignment of residence ("house arrest") and electronic monitoring (such as ankle bracelets) to track the movements of offenders [18 U.S.C. § 3563; UK Offender Management Act 2007]
- 29. Community service as a penalty for minor offenses [California Penal Code, Section 1203.4; UK, the Criminal Justice Community Service Act 1970]
- 30. Community service requirements for corporations as a penalty [Brazilian Environmental Crimes Law (Law No. 9,605/98), Article 9]
- 31. Contribution to Victim Compensation Funds [U.S. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)]
- 32. Loss or residence / removal / deportation / prohibition to reenter for non-citizens [8 U.S.C. § 1227]
- 33. Loss of Citizenship [British Nationality Act 1981]

⁴ The examples given here are not new types. However, some readers may find them preferable.

- 34. Mandatory treatment programs [U.S. Drug Abuse Prevention and Control Act (21 U.S.C. § 841 et seq.]
- 35. Government benefits suspension [U.S. Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA)]

C. Asset Seizure and Financial Measures:

Basic types:

- 36. Impose civil forfeiture of property used in the commission of the offense. [U.S. Comprehensive Crime Control Act, Section 413]
- 37. Impose administrative forfeiture of property used in the commission of the offense. [U.S. Tariff Act of 1930, Section 607]
- 38. Impose criminal forfeiture of property used in the commission of the offense. [U.S. Racketeer Influenced and Corrupt Organizations Act, Section 1963]
- 39. Order the confiscation of property or assets related to the offense. [Canada: Criminal Code, R.S.C., 1985, c. C-46, s. 490; ML Corruption, Section 45.IV.2; ML Alcohol-Cannabis-Tobacco, Section 32.I]
- 40. Seize assets related to illegal activities and convert them into cash to compensate victims. [US RICO Act, Section 1963(a)]
- 41. Make provisions for taking possession of assets or property to which a confiscation order applies and for the disposal of such resources or property. [U.K. Proceeds of Crime Act, Section 239]
- 42. Freeze assets related to suspected infringements. [ML Corruption, Section 28.II.44; ML Alcohol-Cannabis-Tobacco, Section 69.I.jj; US Bank Secrecy Act, Section 311]
- 43. Order the creation of escrow accounts for funds related to potentially infringing activities. [ML Corruption, Section 28.II.115]
- 44. Order the disgorgement of profits made through unfair business practices. [US Sherman Antitrust Act, Section 5]
- 45. Confiscate gains obtained from the illicit practice and oblige compensation for savings made due to it. [ML Animal Protection, Section 80.IV.e; ML Corruption, Section 45.IV.5; ML Alcohol-Cannabis-Tobacco, Section 69.I.ee]
- 46. Confiscate capital or other value gains obtained with the help of gains from the illicit action (indirect gains). [ML Animal Protection, Section 80.IV.f]
- 47. Order the repatriation of assets held abroad. [U.S. Foreign Corrupt Practices Act (FCPA), 15 U.S.C. §§ 78dd-1]
- 48. Impose restrictions on the use of offshore financial structures. [Extrapolated]
- 49. Impose restrictions on dividend payments. [Extrapolated]
- 50. Order temporary suspension of stock trading. [Extrapolated]
- 51. Impose restrictions on certain financial instruments or transaction methods found to facilitate infringements. [ML Corruption, Section 28.II.103; ML Alcohol-Cannabis-Tobacco, Section 69.I.nn]
- 52. Impose restrictions on executive compensation. [ML Corruption, Section 28.II.122; ML Alcohol-Cannabis-Tobacco, Section 69.I.pp]
- 53. Order the revocation of patents or intellectual property rights related to the offense. [U.S. Patent Act, Section 282]
- 54. Recover costs incurred by the Authority from the responsible person. [U.S. Comprehensive Environmental Response, Compensation, and Liability Act, Section 107]
- 55. Issue a payment notice for reimbursement of costs, including calculation of costs and setting payment terms. [ML Environmental Liability, Section 19]

- 56. Impose late interest for failure to reimburse costs by the due date. [ML Environmental Liability, Section 19.4]
- 57. Require reimbursement of awards or relief money falsely or fraudulently claimed. [U.S. False Claims Act, Section 3729; ML Corruption, Section 30.VII]
- 58. Make provisions for taking possession of assets or property to which a confiscation order applies and for the disposal of such resources or property. [ML Alcohol-Cannabis-Tobacco, Section 32.VI]
- 59. Require the deposit of property titles or assets as security against escape from the national territory. [ML Corruption, Section 28.II.63; ML Alcohol-Cannabis-Tobacco, Section 69.I.dddd; ML Animal Protection, Section 80.IV.i]

More of the same:

- 60. Seizure of assets worth up to IDR 10 billion for corruption offenses [Indonesian Criminal Code (Kitab Undang-Undang Hukum Pidana), Article 412]
- 61. Confiscation of assets worth up to AED 1 million for money laundering offenses [United Arab Emirates Anti-Money Laundering and Combating the Financing of Terrorism Law (Law No.14 of July 14,2012)]
- 62. Seizure of assets worth up to €10 million for terrorist financing offenses [EU Terrorism Financing Directive, Article 25(3)]
- 63. Confiscation of assets worth up to £100,000 for money laundering offenses UK Money Laundering Regulations 2017, Regulation 34]

D. Operational Restrictions and Bans:

Basic types:

- 64. Prohibit participation in public tenders for a specified period. [Brazilian Clean Company Act, Law No. 12,846/2013, Article 19]
- 65. Exclude the offender from public tenders and grants. [ML Corruption, Section 45.III.2; ML Alcohol-Cannabis-Tobacco, Section 69.I.z]
- 66. Impose restrictions on access to government contracts or subsidies. [EU Public Procurement Directive 2014/24/EU, Article 57]
- 67. Impose travel bans on individuals involved in serious violations. [U.S. Global Magnitsky Act, 22 U.S.C. § 2656; U.S. Immigration and Nationality Act, Section 212(a)(2)]
- 68. Revoke or deny visas to offenders. [U.S. Immigration and Nationality Act, Section 212(a)(3)]
- 69. Impose restrictions on the entry or residence of offenders in certain countries. [Extrapolated]
- 70. Suspend or revoke (professional and other) licenses or permits. [ML Corruption, Section 45.IV.3; ML Alcohol-Cannabis-Tobacco, Section 69.I.g; US Clean Water Act, Section 403(a); Sarbanes-Oxley Act of 2002 (15 U.S.C. § 7243)]
- 71. Impose a temporary or permanent ban from certain professional activities. [ML Corruption, Section 36.I; ML Alcohol-Cannabis-Tobacco, Section 69.I.g]
- 72. Impose debarment from holding certain corporate positions. [ML Corruption, Section 43; ML Alcohol-Cannabis-Tobacco, Section 69.I.g]
- 73. Impose restrictions on mergers and acquisitions. [ML Corruption, Section 28.II.97; ML Alcohol-Cannabis-Tobacco, Section 69.I.II]
- 74. Impose restrictions on advertising or marketing practices. [ML Corruption, Section 28.II.109; ML Alcohol-Cannabis-Tobacco, Section 69.I.mm; EU General Data Protection Regulation, Article 21; EU Code of Practice on Disinformation, Section 2.2]

- 75. Order the confiscation of a domain and request the domain registrar to cooperate for such confiscation. [U.S. Anticybersquatting Consumer Protection Act, Section 2]
- 76. Impose restrictions on the use of certain types of encryption [U.S. International Traffic in Arms Regulations, Category XIII]
- 77. Impose restrictions on the use of certain technologies. [ML Corruption, Section 28.II.128; ML Alcohol-Cannabis-Tobacco, Section 69.I.qq]
- 78. Impose a ban on the marketing or sale of certain products or services. [U.S. Federal Trade Commission Act, Section 5(a)]
- 79. Impose restrictions on the import or export of certain goods or services. [U.S. International Emergency Economic Powers Act, Section 203]
- 80. Impose restrictions on certain business models. [ML Corruption, Section 28.II.140; ML Alcohol-Cannabis-Tobacco, Section 69.I.ss]
- 81. Impose restrictions on political contributions. [Extrapolated from ML Corruption, Section 45.IV.12]
- 82. Impose restrictions on lobbying activities. [U.S. Honest Leadership and Open Government Act, Section 221]

Sector specific:

- 83. Impose restrictions on cross-border data transfers. [ML Corruption, Section 28.II.116; ML Alcohol-Cannabis-Tobacco, Section 69.I.oo]
- 84. Impose restrictions on the use of anonymous accounts or transactions. [U.S. Bank Secrecy Act, Section 326]
- 85. Impose restrictions on algorithmic decision-making in certain contexts. [EU General Data Protection Regulation, Article 22]
- 86. Impose restrictions on the use of certain types of personal data. [EU General Data Protection Regulation, Article 9]
- 87. Impose restrictions on data collection and processing practices. [Extrapolated from ML Corruption, Section 28.II.104]
- 88. Impose restrictions on the collection and use of biometric data. [Extrapolated from ML Corruption, Section 28.II.104; eU General Data Protection Regulation, Article 9]
- 89. Impose restrictions on the use of facial recognition technologies in public spaces. [Extrapolated from ML Corruption, Section 28.II.104; San Francisco Administrative Code, Chapter 12R]
- 90. Impose restrictions on the use of automated content moderation systems without human oversight. [Extrapolated from ML Corruption, Section 28.II.132; EU Proposal for a Regulation on Preventing the Dissemination of Terrorist Content Online, Article 6]
- 91. Impose restrictions on the use of dark patterns in user interfaces. [Extrapolated from ML Corruption, Section 28.II.109; California Business and Professions Code, Section 22948.2]
- 92. Impose restrictions on the use of artificial intelligence in certain high-risk applications. [Extrapolated from ML Corruption, Section 28.II.132]
- 93. Impose restrictions on water usage in water-stressed areas. [Extrapolated from ML Environmental Liability, Section 9]
- 94. Impose restrictions on certain types of packaging. [EU Directive on Packaging and Packaging Waste, Article 9]
- 95. Impose restrictions on the use of certain raw materials. [EU Regulation on Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Article 67]

- 96. Prohibit the use of certain chemicals or substances in manufacturing processes. [US Toxic Substances Control Act, Section 6(b)(2)]
- 97. Ban the sale or distribution of products containing harmful substances. [US Consumer Product Safety Commission, Section 15(b)(3)]
- 98. Impose restrictions on water usage in water-stressed areas. [California Water Code, Section 10535]
- 99. Impose restrictions on certain types of animal testing. [EU Directive on the Protection of Animals Used for Scientific Purposes, Article 45]
- 100. Impose restrictions on certain types of genetic modification. [EU Directive on the Deliberate Release into the Environment of Genetically Modified Organisms, Article 23]
- 101. Impose restrictions on certain types of employee monitoring. [EU Charter of Fundamental Rights, Article 7]
- 102. Impose restrictions on certain types of workplace surveillance. [EU Directive on the Protection of Workers from the Risks Related to Exposure to Electromagnetic Fields, Article 10]

E. Transparency and Disclosure Measures:

Basic types:

- 103. Order the offender to cooperate with investigations or regulatory authorities. [ML Corruption, Section 28.II.10; ML Alcohol-Cannabis-Tobacco, Section 69.I.cc]
- 104. Oblige any natural or legal person to cooperate for purposes of enforcement of sanctions and collateral measures. [U.S. Federal Rules of Civil Procedure, Rule 34]
- 105. Impose an obligation to share information or data with regulatory authorities. [EU General Data Protection Regulation, Article 32]
- 106. Order the offender to provide access to premises, systems, or other relevant resources for inspection or monitoring. [EU General Data Protection Regulation, Article 58(1)]
- 107. Mandate disclosure of beneficial ownership in a public register. [EU 5th Anti-Money Laundering Directive, Directive (EU) 2018/843; U.S. Anti-Money Laundering Act, Section 6403; ML Corruption, Section 28.II.113; ML Alcohol-Cannabis-Tobacco, Section 69.I.ttt]
- 108. Require public disclosure of infringements by the infringing entity. [ML Corruption, Section 28.II.87; ML Alcohol-Cannabis-Tobacco, Section 69.I.ppp]
- 109. Publish names and further data permitting the identification of natural or legal persons who have deliberately infringed the law. [U.S. Securities and Exchange Commission, Rule 10b-5; ML Corruption, Section 28.II.56 and 45.V.1; ML Alcohol-Cannabis-Tobacco, Section 69.I.qqq and 69.I.r]
- 110. Publish a blacklist of natural and legal persons who committed or contributed to infringements. [ML Corruption, Section 28.II.21; ML Alcohol-Cannabis-Tobacco, Section 69.I.y; U.S. Department of the Treasury, Office of Foreign Assets Control, Specially Designated Nationals and Blocked Persons List]
- 111. Order public naming and shaming through official channels. [U.K. Financial Conduct Authority, Enforcement Notices; ML Corruption, Section 28.II.56; ML Alcohol-Cannabis-Tobacco, Section 69.I.y]
- 112. Impose mandatory sustainability and corporate social responsibility reporting related to compliance matters. [EU Directive on Non-Financial Reporting, Article 19a]
- 113. Establish and maintain a public registry of enforcement decisions and guidance documents. [U.S. Securities and Exchange Commission, Enforcement Actions

- Database; ML Corruption, Section 28.II.39; ML Alcohol-Cannabis-Tobacco, Section 69.I.xxx]
- 114. Require mandatory disclosure of tax information. [U.S. Foreign Account Tax Compliance Act, Section 1471]
- 115. Mandate the implementation of whistleblower protection programs. [U.S. Sarbanes-Oxley Act, Section 806]
- 116. Publish evaluations of compliance statistics and reports. [U.S. Environmental Protection Agency, Toxics Release Inventory; ML Corruption, Section 28.II.23; ML Alcohol-Cannabis-Tobacco, Section 69.I.rrr]
- 117. Impose mandatory disclosure of lobbying activities and political contributions. [U.S. Lobbying Disclosure Act, Section 4; ML Corruption, Section 28.II.131; ML Alcohol-Cannabis-Tobacco, Section 69.I.uuu]
- 118. Require the creation of consumer education programs related to the entity's products or services. [ML Corruption, Section 28.II.130; ML Alcohol-Cannabis-Tobacco, Section 69.I.vvv]
- 119. Create and manage labeling systems for compliant and non-compliant entities. [ML Corruption, Section 28.II.24; ML Alcohol-Cannabis-Tobacco, Section 69.I.www]
- 120. Mandate the use of blockchain or other distributed ledger technologies for enhanced transparency and traceability [Extrapolated]
- 121. Impose an obligation to notify customers, partners, or other stakeholders of the infringement. [EU General Data Protection Regulation, Article 33]
- 122. Order the publication of corrective statements or apologies in relevant media outlets. [UK Enterprise Act 2002, Section 215]

Sector specific:

- 123. Require public disclosure of gender pay gap information. [Extrapolated]
- 124. Require public reporting on modern slavery risks in supply chains. [UK Modern Slavery Act 2015, Section 54]
- 125. Impose mandatory sustainability and corporate social responsibility reporting related to compliance matters. [ML Corruption, Section 28.II.106; ML Alcohol-Cannabis-Tobacco, Section 69.I.sss]
- 126. Mandate disclosure of product lifecycle environmental impact data. [EU Ecodesign for Sustainable Products Regulation]
- 127. Require public reporting on workforce diversity and inclusion metrics. [Extrapolated]
- 128. Mandate disclosure of algorithmic decision-making processes in Al-driven services. [Extrapolated]
- 129. Require public reporting on cybersecurity incidents and data breaches. [Extrapolated]
- 130. Require mandatory disclosure of tax information. [Extrapolated from ML Corruption, Section 45.IV.1]
- 131. Require the creation of consumer education programs related to the entity's products or services. [U.S. Federal Trade Commission Act, Section 5]
- 132. Create and manage labeling systems for compliant and non-compliant entities. [EU Regulation on Energy Labeling, Article 4]
- 133. Require public disclosure of gender pay gap information. [U.K. Equality Act, Section 78]
- Mandate disclosure of product lifecycle environmental impact data. [EU Regulation on Ecodesign, Article 10]

- 135. Require public reporting on workforce diversity and inclusion metrics. [U.S. Securities and Exchange Commission, Proposed Rule 13h-1]
- 136. Mandate disclosure of algorithmic decision-making processes in Al-driven services. [EU General Data Protection Regulation, Article 13]
- 137. Require public reporting on cybersecurity incidents and data breaches. [U.S. Securities and Exchange Commission, Disclosure Guidance: Topic No. 2]
- 138. Require mandatory disclosure of supply chain information. [California Transparency in Supply Chains Act, Section 1714.43]

F. Remediation and Compensation Measures:

Basic types:

- 139. Order the payment of compensation to victims or affected parties. [ML Corruption, Section 45.VI.1; ML Alcohol-Cannabis-Tobacco, Section 69.I.t]
- 140. Mandate the implementation of victim compensation funds. [U.S. Victims of Crime Act, Section 1402; ML Corruption, Section 45.IV.11; ML Environmental Liability, Section 31]
- 141. Mandate participation in rehabilitation or education programs. [Extrapolated from ML Corruption, Section 45.IV.4]
- 142. Impose an obligation to notify customers, partners, or other stakeholders of the infringement. [EU General Data Protection Regulation, Article 33]
- 143. Order the publication of apologies in relevant media outlets. [UK Enterprise Act 2002, Section 215]
- Impose liability on directors or officers for infringements committed by the legal person. [ML Corruption, Section 45.VI.2; ML Alcohol-Cannabis-Tobacco, Section 69.I.u]
- 145. Order the implementation of remedial measures or improvement plans. [EU General Data Protection Regulation, Article 58(2)(d);]
- 146. Impose mandatory product recall procedures for non-compliant or dangerous products. [ML Corruption, Section 28.II.119; ML Alcohol-Cannabis-Tobacco, Section 69.I.xxxx]
- 147. Issue a payment notice for reimbursement of costs, including calculation of costs and setting payment terms. [U.K. Environmental Damage (Prevention and Remediation) Regulations, Regulation 12]
- 148. Impose late interest for failure to reimburse costs by the due date. [U.K. Late Payment of Commercial Debts (Interest) Act, Section 1]
- 149. Restorative justice processes, where offenders meet with victims to discuss the impact of their actions and agree on a plan for reparation [New Zealand, the Sentencing Act 2002]

Sector specific:

- 150. Mandate carbon offsetting payments [Extrapolated from ML Environmental Liability, Section 9]
- 151. Mandate the implementation of environmental remediation programs [U.S. Comprehensive Environmental Response, Compensation, and Liability Act, Section 104; ML Environmental Liability, Section 9]
- 152. Impose administrative costs related to the prevention or remediation of environmental damage on the responsible person. [U.S. Comprehensive Environmental Response, Compensation, and Liability Act, Section 107; ML Environmental Liability, Section 18]