



# Compliance and Investigations

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Lefosse



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# Legislation

# Legislation

## Permanent Crisis Management Committee is Established by CGU

As registered by the Minister of the CGU, Vinicius de Carvalho, on the G20 meeting in Natal last month, the CGU has been concerned and attentive to the deviations and illicit acts practiced in the context of crises, such as the COVID-19 pandemic and the latest floods in Rio Grande do Sul.

As a result, the CGU established the Permanent Crisis Management Committee (CPGC), whose focus is to ensure an agile and integrated response of the agency in times of crisis, calamity and disasters.

During the floods south of Brazil, the CGU even created an exclusive section to monitor federal financial aid on the Federal Transparency Portal. The collegiate interaction at that time resulted in the need for this permanent instance, especially with the possibility of future new cases across the country.

The CPGC will be composed of representatives of all CGU secretariats and the heads of CGU's Regional Offices involved in the crisis. The coordination of the Committee will be in charge of the Executive Secretariat of the CGU, which will also be responsible for organizing the activities and compiling the results, to be presented in a final report to the minister.

Coordinated and evidenced responses will allow not only agility in addressing cases but also facilitate control and access to information by the Brazilian agencies. Therefore, it is essential that companies that are affected and receive public resources, as well as companies that engage in support, especially financial, must do so with due diligence and compliance, under penalty of facing sanctions ahead, even administrative proceedings under the Anti-Corruption Law.

Access Normative Ordinance No. 178/24 [here](#).

02

# Other Highlights

## Other Highlights

### CGU Leads Global Anti-Corruption and Integrity Initiatives at G20

In 2024, the Brazilian Office of the Comptroller General of the Union (CGU) took a prominent role in the 3 meetings of the G20 Anti-Corruption Working Group (GTAC), leading initiatives to strengthen anti-corruption guidelines and promote public and private integrity on a global scale. Under the Brazilian presidency, the GTAC has defined three priorities for the Group:

- (i) encourage the private sector to adopt integrity measures;
- (ii) organize institutions to prevent corruption in public administration; and
- (iii) implement actions that promote a fairer and more sustainable society.

During the meeting in October, the GTAC also approved a ministerial declaration to be submitted to the G20 leaders next week, in Rio de Janeiro, at the summit of heads of state and government. The document lists commitments to sustainable development, global governance and the fight against corruption – which, according to CGU Minister Vinicius de Carvalho, cannot move forward without the commitment of all.

The CGU's leading role in the G20 highlights the importance of a collaborative and innovative approach in the fight against corruption, by promoting clear guidelines and implementing advanced technologies such as the ALICE robot, presented at the meeting prior to the GTAC and a great ally in the fight against corruption in bidding.

For more information, click [here](#).

## Other Highlights

### ANTT Adheres to the Brazil Pact: A Milestone in the Promotion of Integrity and Ethics in the Transport Sector

The adhesion of the Brazilian National Land Transport Agency (“ANTT”) to the Brazil Pact for Business Integrity marks a local achievement in the maturity of integrity and ethics with the public entities. This commitment, under the Term of Commitment of Institutional Supporter signed by the Director General of ANTT, Rafael Vitale, arose from the collaboration between the CGU, the Ministry of Transport and ANTT itself.

The initiative aims to motivate entities (mostly companies) to make public and voluntary commitments to integrity and transparency, promoting ethical practices that benefit the business environment. As the regulatory body responsible for the land transport sector, one of the pillars of national infrastructure, ANTT strengthens the CGU movement by participating in the group of supporters of this important initiative.

The Brazil Pact for Business Integrity has several institutional supporters, including entities such as the Federation of Industries of the State of São Paulo (FIESP) and the National Department of Transport Infrastructure (DNIT). The movement currently counts with 183 companies committed to high standards of compliance and to create a culture of solid business ethics.

As the first regulatory agency to join the movement, ANTT is committed to the implementation of compliance initiatives, which undoubtedly reflects on the dynamics of both the companies regulated by the agency and the ANTT suppliers, which must be aware of the requirements replicated by the Agency.

For more information, click [here](#).

## Other Highlights

### **CGU and National Network advance in Standardization of Anti-Corruption Law to Strengthen Private Integrity**

On October 30, 2024, the CGU held the 4th Meeting of the National Network for the Promotion of Private Integrity, held in Brasilia. The meeting brought together representatives from 17 states and 8 municipalities with the objective of promoting and standardizing the application of the Brazilian Anti-Corruption Law No. 12,846/2013 at the federal, state and municipal levels.

Launched in October 2023, the initiative integrated by the three levels of the Comptroller Offices aims to disseminate knowledge and integrated strategies to promote integrity in the private environment.

This year, the Minister of the CGU, Vinícius Marques de Carvalho, emphasized the importance of the partnership between the different levels of government in the control agenda, highlighting the articulating role of the Network in the promotion of integrity. Marcelo Vianna, Secretary of Private Integrity of the CGU, stressed that Brazil has become an international reference in the fight against corruption, promoting a fairer society with greater capacity for economic development.

The meeting addressed the normative agenda at the federal level, the Brazil Pact for Business Integrity and the performance of institutional supporters.

It is evident that the Brazilian controlling bodies, under the leadership of the CGU, have been engaged in the agenda, and the National Network represents an important leveling mechanism for states and municipalities in the culture of integrity and the fight against corruption.

For more information, click [here](#).



# CGU Observatory: Trends in PARs established in the month

In November of 2024, the administrative proceedings initiated by CGU were mostly centered on facts known by the authority in 2023 and involved various public entities.

## Public Bodies:

- Ministry of Transport
- Ministry of Finance
- Ministry of Health

Services

Real Estate

Construction

## Illicit Facts:

- Payment or offering of undue advantage, directly or indirectly, to a national public agent or a related third party
- Favoring oneself or third parties
- Hindering the investigation or inspection activities of national public agencies or agents
- Covert use of an intermediary to obtain undue advantage with the national public administration

# Compliance and Investigations Practice



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