

TAUIL | CHEQUER

MAYER | BROWN

CGU'S NEW
INTEGRITY
PROGRAM
GUIDELINE
FOR PRIVATE
COMPANIES



On October 15, 2024, the Brazilian Office of the Comptroller General (*Controladoria-Geral da União* or “CGU”) published Volume II of its Integrity Program Guideline for Private Companies (“*Manual Programa de Integridade: Diretrizes para Empresas Privadas*” or “Guideline”), which sets new recommendations for implementing, improving and monitoring integrity programs based on recent legislative updates and new market practices regarding integrity and environmental, social and corporate governance (“ESG”) matters.

Although the Guideline does not have a normative or binding nature, it aims to update and complement the first volume of the document released in 2015 in order to disseminate and encourage the adoption of best integrity practices while providing transparency and predictability on CGU’s perspective and approach with respect to such matters.

The Guideline’s best practice recommendations take into account regulations related to anti-corruption matters that came into force after 2015, such as Decree No. 11,129/2022, which regulates Law No. 12,846/2013 (or Anti-Corruption Law), and Law No 14,133/2021 (or New Law on Public Bids and Administrative Contracts), which now establishes the mandatory adoption of integrity programs by companies involved in large-scale public contracts, including for tie-breaking criteria and as a condition for the rehabilitation of ineligible companies.

When preparing the Guideline, the CGU also considered other regulations that, although applicable to companies operating in the public sector, can also be taken into consideration by private companies for the purposes of structuring their integrity programs, such as Law No. 13,303/2016 (or the State-Owned Companies Law) and Decree No. 11,529/2023 (which regulates the Federal Public Administration’s Integrity, Transparency and Access to Information System).

The Guideline pays special attention to the need to implement policies and procedures related to ESG matters, such as the prevention of harassment and discrimination practices, the promotion of corporate diversity and respect for human, social and environmental rights, with emphasis on the management of risks related to slave-like labor and the preservation of the environment.

To ensure that our clients are always informed and up to date, we have prepared the following summary of the main recommendations set forth in the Guideline. If you have any questions, do not hesitate to contact us – our Global Investigations & White-Collar Defense team is available to offer personalized support, discuss how these guidelines can impact your company and help you implement the best integrity and governance practices currently recognized by the CGU.

Enjoy your reading!



I. CONCEPT OF "INTEGRITY PROGRAM" UPDATED

The CGU introduces the Guideline by stating that it is essential that the concept of Integrity Program, initially defined by Decree No. 8,420/2015 (which originally regulated the Anti-Corruption Law until its revocation by Decree No. 11,129/2022), starts including the following objectives:

- Foster and maintain a **culture of integrity** in the organizational environment; and
- Combat **other ethical and conduct deviations**, violations or disrespect for rights, values and principles that **impact trust, credibility and institutional reputation**.

Such aspects of integrity were introduced, respectively, by Decree No. 11,129/2022 (Article 56) and Decree No. 11,529/2023 (Article 3). According to the CGU, these

aspects **add other elements** to the concept of Integrity Program **besides the fight against fraud and corruption**, such as positive actions that promote **ethics, good governance, respect for human and social rights, and the preservation of the environment**.

In the Guideline, CGU also highlights that addressing and committing to these practices is an "increasingly current demand from society," which requires public and private organizations to act "responsibly" and "committed to sustainable, fair and democratic economic and social development," especially with regard to ESG practices, which "have gained significant prominence in the last decade" and "can no longer be ignored by companies."

II. NEW CONSIDERATIONS FOR IMPLEMENTING AND/OR IMPROVING INTEGRITY PROGRAMS

INTEGRITY AND CORPORATE GOVERNANCE

BEST PRACTICE

The governance structure¹ plays a fundamental role in promoting integrity within the companies, as its internal bodies and individuals are responsible for making decisions that define the choice of leadership, corporate strategy and the way in which business is conducted and controlled. Regardless of their complexity, **it is important that companies have a well-defined management and control**

structure, with clearly defined roles and responsibilities that are accessible to stakeholders.

RECOMMENDATIONS

- **Adjusting the governance structure to the size, activities** carried out by the company and the applicable regulatory framework.
- **Detailing the duties and responsibilities** of the agents and bodies that compose the governance structure **in the company's internal regulations** (by

¹ In general, a company's governance structure can be represented by the shareholders and owners, the Board of Directors, the Advisory Committees, the Chair, the Executive Officers and the Supervisory and Control Bodies, as well as the relationships between them. This structure can vary according to the characteristics of each company, such as size and number of employees.

laws, articles of incorporation and other regulations), as well as disclosing this information within the organization.

- Implementing instruments to oversee the Integrity Program in the governance structure.
- Assessing the possibility of ensuring greater diversity in the composition

of the company's governance bodies, reflecting the society in which it operates.

- Disclosing the governance structure (including information on the individuals that compose such structure, the positions they hold and their qualifications) on the company's institutional website.



ATTENTION!

With regard to economic groups, the recommendations above can be observed for all the companies that compose the group. Additionally, the CGU recommends that information on their composition, control structures and the relationship between subsidiaries and controlling companies are also disclosed.

LEADERSHIP'S ROLE

BEST PRACTICE

The commitment of companies' senior management,² evidenced by visible and unequivocal support for the program, as well as the allocation of adequate resources, is the foundation of an effective Integrity Program. Leaders should be seen as examples of conduct and the first to observe the principles of the Integrity Program in order to ensure that those who commit irregularities are properly held accountable.

RECOMMENDATIONS

- Verifying conduct history for selecting potential candidates for leadership positions (e.g., involvement in cases of corruption,

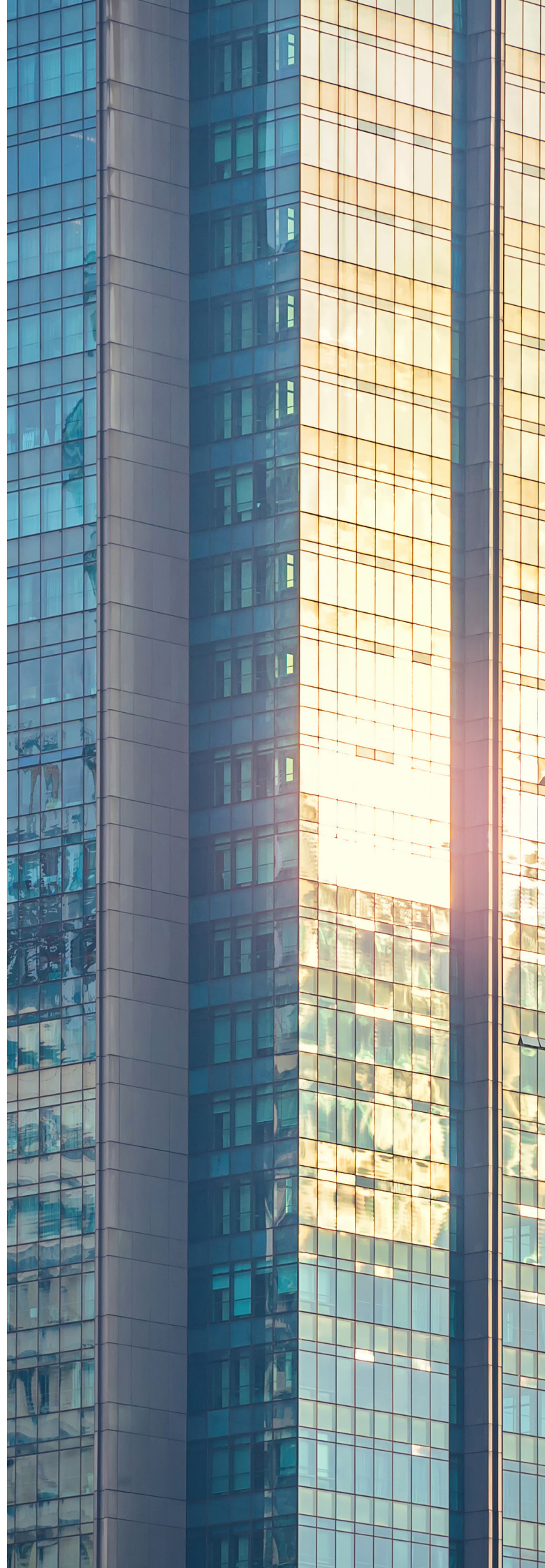
fraud, harassment, human rights violations or environmental damage, as well as possible failure to act in such cases).

- Including the achievement of milestones related to the application of the Integrity Program in the performance evaluation of senior management members and for granting variable compensation (bonuses).
- Implementing mechanisms that prevent the payment of bonuses or the granting of other types of benefits to members of senior management who commit irregularities or fail to act in the event of ethical violations.
- Requiring senior management members to be qualified with

² Members of senior management are those who occupy leadership roles in the company and are responsible for making strategic and operational decisions. Examples of senior management are the members of the Board of Directors, the CEO and other executive officers. With regard to micro and small companies, senior management can be their owners, shareholders, administrators and managers.

respect to corporate integrity matters (such as anti-corruption policies, ESG criteria and corporate governance), so that they can contribute to the implementation and oversight of the Integrity Program.

- Ensuring that members of senior management **attend internal compliance trainings, with periodic updates** (especially for members of senior management who compose bodies with the authority to deal with issues related to the application of the Integrity Program).
- Providing **clear and frequent expressions of support for the Integrity Program** through internal communications, electronic messages, social media, videos and meetings. In this case, it is important that **the statements made are also reflected in the companies' decision-making processes**.
- Providing **financial and human resources to guarantee the implementation and proper functioning of the Integrity Program**, in a manner compatible with the size and risks to which the company is subject, as well as **proportional to the investments made in other sectors of the company**.
- **Applying sanctions to those who commit any irregularities**, regardless of the position held by the offender, with remediation measures (including disciplinary measures) proportional to the seriousness of the infraction.



INTERNAL DEPARTMENT RESPONSIBLE FOR THE INTEGRITY PROGRAM

BEST PRACTICE

Companies must have a department responsible³ for leading and coordinating the process of implementing, applying and monitoring the Integrity Program. These tasks need to be carried out with autonomy and authority so that the Integrity Program can actually be implemented and applied in the company's routine.

RECOMMENDATIONS

- Formalizing the responsibilities, guarantees and reporting lines (including the form and minimum periodicity of reports) of the department responsible for the Integrity Program in a document approved by the highest hierarchical level of the company.
- Providing financial, material and human resources so that the department responsible for the Integrity Program can carry out its activities, including (i) ensuring the effective participation of the person responsible for the program in the development of the area's budget; (ii) setting budget contingencies in similar proportions to the contingency practiced in other areas; (iii) providing a sufficient number of employees for the program's activities; and (iv) allocating funds for the development, contracting and maintenance of electronic tools and systems for applying and monitoring the program.
- Requiring that the members of the department responsible for the Integrity Program are qualified, including a university degree and experience in risk management, regulation and internal controls, and willingness to be periodically updated.
- Ensuring that the person responsible for the Integrity Program occupies a hierarchical position equivalent to the other areas that deal with related issues, including compensation compatible with the complexity of the position held and with the compensation received by the other leaders who occupy similar positions in the company.
- Ensuring that the department responsible for the Integrity Program reports directly to the highest hierarchical level of the company, including the preparation of periodic reports (containing information on the stage of implementation of the program, risks identified and mitigation measures, data and statistics on the application of the program, irregularities detected and complaints received).
- Ensuring that the department responsible for the Integrity Program is subject to senior management supervision and periodic auditing procedures (external or internal).
- Ensuring that the activities of the department responsible for the Integrity Program are carried out by individuals working in the company, who are aware and share the organizational culture with the other members. If certain activities are outsourced, the services provided by the third parties must be supervised by the person responsible for the compliance department.

³ The way this department is structured depends on many factors, from the size of the company to the nature of the activities it carries out. In large companies and companies operating in highly regulated sectors, it is common to have a compliance department. In small companies, there may only be one person assigned to this function.



ATTENTION!

With regard to multinational companies, it is important that they implement a local department responsible for the Integrity Program in Brazil, structured to ensure its application taking into account the Brazilian reality.

In economic groups, it is important to be clear about which departments are responsible for implementing, applying and monitoring the Integrity Program (if any), as well as the hierarchy and forms of interaction between them.

The internal department responsible for the Integrity Program (which has an operational nature) should not be mistaken for the collegiate bodies that compose the corporate governance structure (which have supervisory and guiding nature), such as the Ethics Committees. Both structures are relevant within the scope of the Integrity Program and are interrelated, but are not the same.

INTEGRITY RISK MANAGEMENT

BEST PRACTICE

Companies must adopt procedures for managing the risks⁴ arising from their operations and the market in which they operate, in order to ensure the effective implementation of the Integrity Program. Based on the risk assessment conducted, companies must adopt adequate measures to mitigate their main risks and thus allocate their resources more efficiently.

RECOMMENDATIONS

- Identifying integrity risks and classifying them according to probability and impact, prioritizing them and defining mitigation measures, including designating those responsible for addressing

them and the deadlines for their implementation.

- In addition to the risks of fraud and corruption, consideration of (i) environmental risks,⁵ and (ii) risks related to activities carried out by the company on a day-to-day basis, even if it does not enter into administrative contracts with public authorities (e.g., facilitation payments, granting hospitality, courtesies and entertainment to public officials, financing cultural projects, interactions with tax authorities and credit operations with public banks).
- Periodic monitoring of risks under the coordination of the department responsible for the Integrity Program and the supervision of senior management.

⁴ There are various risk assessment methodologies on the market, and it is up to each company to use the one that suits them best. Companies are expected to effectively assess the integrity risks that exist in their activities.

⁵ The Federal Attorney General's Office (AGU) has already established precedents that certain environmental infractions committed by companies should be included in the concept of ineligible behavior under the terms of Article 155, X of the New Law on Public Bids and Administrative Contracts.



ATTENTION!

With regard to multinational companies, it is important to assess the integrity risks related to their operations in Brazil. These risks should guide the adjustment of the company's Integrity Program (in case a global program is adopted).

STANDARDS OF BEHAVIOR

BEST PRACTICE

Companies must define the **standards of conduct expected of their leaders, employees and main business partners**, taking into account the reality in which they operate and the risks to which they are subject. Companies should adopt a **Code of Ethics that establishes the principles and values that should guide their activities and the behavior of all those who are part of it**, as well as **integrity policies and procedures⁶ that address specific risks and set forth rules, controls and responsibilities to mitigate the occurrence of irregularities.**

RECOMMENDATIONS

a. Code of Ethics ("Code")

- Developing a Code that takes into account the company's **culture, history, purpose, challenges and commitments**, not only in the **content**, but also in the

language, layout, images and case studies.

- Approving the Code through the **highest hierarchical level** of the company.
- Making the Code available on the **company's institutional website.**
- Addressing issues such as (i) prohibition and zero tolerance of **fraud and corruption practices**; (ii) commitment to **respecting human rights and preserving the environment**; (iii) prohibition of **harassment and discrimination practices**; (iv) **diversity inclusion**; (v) prohibition of the exploitation of **child labor** and the use of **slave-related labor practices**; (vi) use of **reporting channels and mechanisms to protect whistleblowers**; and (vii) the possibility of **applying sanctions** to those who commit irregularities.

⁶ The content and way in which policies are structured depends on the specific characteristics of each company: some companies may address several issues in a single policy (relations with public authorities, granting of gifts, presents and hospitality, due diligence and hiring of third parties, donations and sponsorships, mergers and acquisitions), while others may establish a specific policy for each issue mentioned. This will depend on the degree of interaction with the public authorities, the risks related to their activities, their characteristics and their business model.



ATTENTION!

With regard to multinational companies that adopt global integrity programs, it is important to adopt a Code of Ethics in Portuguese and adapted to the Brazilian reality and legislation.

With regard to companies that adopt a specific Code of Ethics for the third parties with which they relate, it is important to establish, at the very least, (i) the conduct expected of third parties and the ones that are not allowed, (ii) the possibility of applying sanctions in the event of violations (including contractual ones), and (iii) the channels available to third parties for making complaints.

b. Integrity Policies and Procedures

- Establishing policies and procedures through a **formal process, with the approval of the company's senior management** and the indication of the date, the person responsible for the approval and any changes made.
- Defining **rules, workflows and procedures applicable to the company's routine**, indicating those responsible for their application and control (policies must be operational).
- Establishing **controls that are proportional** to the risks they are intended to mitigate.
- Presenting internal **guidelines that are compatible with the applicable Brazilian legislation**.
- Ensuring that all policies and procedures can be **accessed by employees and other stakeholders** interested in their application (intranet, institutional website, posters, printed folders and QR codes).
- **Recording and documenting the application** of policies.
- Adopting specific policies that address issues related to the **prevention of harassment and discrimination practices**, as well as **respect for human rights and environmental sustainability**, in line with the 10 Guiding Principles of the United Nations Global Compact.
- With regard to companies that contract with the Public Administration, **adopting a policy that sets forth specific rules aimed at preventing violations in the context of public bids and contracts**, such as (i) mapping risks prior to participation in bids; (ii) prior verification of fulfillment of the conditions required in bids and contracts; (iii) indicating those responsible for approving the company's participation in bids and interacting with public agents in the execution of contracts; (iv) conduct expected of employees and third parties acting on behalf of the company in bids and in the execution of contracts; (v) express prohibition of collusion and combining prices or bid conditions with competitors; (vi) rotation of those responsible for interacting with public agents during the execution of contracts, depending on the term of the contract; (vii) defining the internal authorities responsible managing contracts; (viii) periodic reassessment of the risks of the contracts executed and (ix) disclosing information regarding the bids in which the company participates and the administrative contracts it has entered into on its institutional website.



ATTENTION!

For multinational companies that adopt global integrity programs, it is essential that, just like the Code of Ethics, the main policies and procedures are made available in Portuguese and adjusted according to the Brazilian legislation.

COMMUNICATION AND TRAINING

BEST PRACTICE

- It is through communication and training actions that the Integrity Program will be known, internalized and applied in companies. Companies must have a **formal plan and carry out these actions on a regular basis, by different means and taking into account the specific audience they are aimed at.** The department responsible for the Integrity Program – even if it does not lead this process directly – must participate in its planning, content creation, training application, supervision of activities or in the hiring of third parties responsible for conducting the training sessions.

RECOMMENDATIONS

a. Training

- Conducting **specific training sessions** based on the main risks identified by the company and aimed at specific

audiences, especially individuals who occupy higher-risk positions.

- Investing in **different types of training**, combining simpler formats, such as educational videos, with more comprehensive training, both online and in-person, in which there is more intense interaction between employees and instructors, allowing inquiries to be resolved.
- **Evaluating the impact and effectiveness of training** by comparing statistics, applying tests, simulations and perception surveys, in order to identify gaps and opportunities for improvement.

b. Communication

- Promoting **positive conduct** in the organizational environment, encouraging and recognizing ethical behavior, respect for human rights and diversity and the pursuit of sustainable environmental practices.



- Conducting the company’s business and leadership actions in accordance with the content of the messages conveyed.
- Ensuring transparency with regard to the actions adopted if irregularities are detected, communicating in a timely, clear and objective manner the facts investigated and the actions adopted to interrupt, remediate and mitigate them.
- Disclosing, on the company’s

institutional website, information on (i) governance structure; (ii) main interactions with the Public Administration (participation in public bids, execution of administrative contracts, donations and sponsorships); (iii) main policies and information on the Integrity Program and (iv) periodic reports with information on its environmental, social and governance performance.



ATTENTION!

With respect to multinational companies, communication actions must go beyond merely translating messages from the headquarter. Communication actions must take into account the culture and values shared by those who are part of the company in Brazil.

ACCOUNTING CONTROLS

BEST PRACTICE

All companies, regardless of their size, must establish accounting records and controls to ensure that administrators have a clear understanding of the organization’s financial situation and can make informed decisions, avoiding the centralization of decisions in a few areas or people. These activities must be supported by strict policies and procedures that establish the workflows of the financial records, in order to guarantee their fidelity and reliability, as well as mitigating the possibility of fraudulent acts.

RECOMMENDATIONS

- Adopting rules that establish segregation of duties and define

approval levels for income, expenses and asset transactions.

- Adopting red flags warning mechanisms to identify unusual expenditure and income.
- Adopting guidelines that require verification of the execution of the subject matter of contracts in order to make payments.
- Using computerized systems programmed in accordance with company policies and procedures.
- Establishing an internal audit department⁷ and, for large companies, independent external audits, even in the absence of a legal requirement.

⁷ The CGU establishes, as a standard, the three lines of defense recommended by the Committee of Sponsoring Organization of the Treadway Commission (COSO) and the Institute of Internal Auditors of Brazil (IIA).

THIRD PARTIES

BEST PRACTICE

Companies must adopt appropriate, risk-based due diligence procedures for contracting and supervising the third parties with which they have relationships, in order to mitigate possible risks of irregularities and to choose business partners who share the same values and ethical behavior.

RECOMMENDATIONS

- Adopting specific policies and procedures for contracting and supervising third parties, including for mergers, acquisitions and corporate restructuring processes (in this case, providing for the measures to be adopted for the continuity or not of operations in case any irregularities are identified, as well as the role of the department responsible for the Integrity Program in the respective decision-making process).
- Using tools available on the market to assist in carrying out the due diligence procedures.
- Consulting public databases, including the Register of Ineligible and Suspended Companies (*Cadastro de Empresas Inidôneas e Suspensas* or “CEIS”), the National Register of Punished Companies (*Cadastro Nacional de Empresas Punidas* or “CNEP”) and the Register of Debarred Private Non-Profit Entities (*Cadastro de Entidades Privadas sem Fins Lucrativos Impedidas* or “CEPIM”).
- Using CGU’s Certificate System to issue or validate negative certificates relating to sanctions in force in the CGU-PJ, CEIS, CNEP and CEPIM systems.
- Analyzing the involvement of third parties in other ethical violations (in addition to the practice of corruption and fraud acts), such as environmental damage and disrespect for human rights, including by consulting the Ministry of Labor and Employment’s Register of Employers who have subjected workers to conditions analogous to slavery.
- Conducting research on positive information about third parties, such as the adoption of an Integrity Program, receipt of integrity awards (such as the Pro-Ethics Program), or



adherence to pacts or other public commitments aimed at promoting corporate integrity.

- Defining the integrity risk profile of potential partners and **prioritizing the hiring of third parties committed to a culture of integrity in their business operations.**
- **Periodic monitoring of third parties,** including periodic due diligence depending on the term of the contract and the third party's risk profile.
- Paying attention to **circumstances that may indicate, in the context of contracts involving intermediation of relationships with the Public Administration, the occurrence of possible irregularities on behalf of the business partner (e.g., requesting payments by unusual means, requests for payments to be made to third party accounts, requests for exorbitant commissions, vague descriptions of the services provided, hiring of Politically Exposed Persons to occupy relevant positions, dissemination of disreputable news in the media, etc.).**
- **Reporting possible irregularities detected** during the course of the contract **to the person responsible for the Integrity Program,** who must investigate and remedy them.
- Adopting contractual clauses that establish (i) the obligation to comply with ethical standards, as well as the **prohibition of fraud and corruption practices and disrespect for human, labor and social rights by the third party;** (ii) the possibility of **applying sanctions,** including contract termination, in the event of any ethical violations and (iii) **payment of indemnification** in case the company is held accountable for the third-party illegal actions.

DETECTING AND INVESTIGATING IRREGULARITIES

BEST PRACTICE

Companies must adopt, operate and make available **whistleblowing channels for detecting irregularities,** as well as adopting specific policies and procedures for **addressing and investigating the complaints received.**

RECOMMENDATIONS

a. Detection

- Making the **Whistleblowing Channel available in Portuguese,** from the moment it is accessed to the moment reports are made.
- Providing **easy access to the Whistleblowing Channel for the internal and external public.** At least one whistleblowing channel should be made available on the company's institutional website.
- Expressly stating in the Whistleblowing Channel that it is **intended for receiving reports of irregularities** (highlighting the types of irregularities that can be reported). The channel must not be confused with the Consumer Assistance Service (or SAC).
- **Expressly encouraging people to make complaints** in case any irregularities are detected, **prohibiting retaliation practices** and ensuring **anonymity and confidentiality** to the reports made.
- Allowing whistleblowers to follow up on the investigation of the complaints, to ensure transparency and credibility to the investigation process.

b. Investigation

- Adopting policies and procedures applicable to the process of **addressing and investigating complaints,** with a clear definition of those responsible for

each stage of the process.

- Establishing **specific workflows for addressing and investigating complaints** if the irregularities reported involve **members of senior management**.
- Adopting **immediate measures to interrupt irregularities** that, depending on their seriousness, may include restricting access to systems, preventive dismissal from executive positions, the inclusion of new thresholds for making payments in the context of contracts under investigation and the suspension of contracts with business partners.
- **Applying sanctions to offenders in the event of proven irregularities**, in accordance with the company's internal policies.
- **Periodically disclosing general information on the investigation procedures conducted and the application of disciplinary measures**, without exposing employees or sensitive company processes.
- **Preserving all evidence** related to the irregularities investigated, so that it can be used, if necessary, in any process of collaboration with the authorities.

MONITORING

BEST PRACTICE

Companies must plan, structure and document **monitoring processes that allow the identification and treatment of any gaps** in the Integrity Program, the improvement of existing measures, the monitoring of the occurrence of any new

risks and, consequently, the timely development of mitigation measures.

RECOMMENDATIONS

- Developing a **Monitoring Plan**.
- **Defining those responsible for carrying out monitoring activities**, including the department responsible for the Integrity Program.
- Defining a **periodicity** for carrying out monitoring activities.
- **Standardizing the way and frequency in which the information and data obtained from the monitoring activities is presented**.
- **Sharing the results of the monitoring activities with the highest hierarchical levels** of the company.
- Using simple, objective and specific **indicators and performance milestones** (e.g., number of employees attending compliance training, average time spent investigating complaints, number of third parties hired without undergoing the due diligence procedure, number of courtesies offered to public officials, number of violations of policies and procedures detected in a year, number of audit procedures carried out).
- Carrying out **perception surveys**, internally or through contracted companies.
- **Documenting and recording the entire monitoring procedures**.



III. MINIMUM STRUCTURE OF THE INTEGRITY PROGRAM

Despite the differences of size, activities, characteristics and risks of each company, it is important to define a **minimum structure**; without this structure, it is not possible to consider the existence of an Integrity Program. The CGU considers at least the following elements to be present in a program:

- Visible and unequivocal **support from members of senior management**;
- Existence of an **internal department** – area or person – **responsible for implementing the Integrity Program**;
- Carrying out a **risk assessment** that includes the analysis of **integrity risks**;
- Existence of a Code of Ethics or equivalent document available in Portuguese;
- Existence of a policy or procedure that at least **expressly prohibits the granting of undue advantages**, economic or otherwise, to public officials;
- **Compliance training and communication actions** focused on the company's employees; and
- **Whistleblowing channel** available in Portuguese.

This minimum structure is an excellent start for implementing the program, but it is **crucial that the program is operationalized and effectively applied in the company's day-to-day activities**. For an Integrity Program to be effectively recognized and considered by the CGU, it must **exceed mere formalities** and reflect, in the business environment, a true commitment to corporate governance and business ethics.

The Guideline's new recommendations can help companies achieve this goal, as they (a) contribute to the development of a **more transparent and responsible business environment**; (b) play a fundamental role in **strengthening integrity and social responsibility initiatives** and (c) help in the **positive evaluation of Integrity Programs** in Administrative Liability Proceedings (PARs) initiated by the CGU and other authorities based on the Anti-Corruption Law, leniency agreements and even within the scope of projects that promote corporate integrity (e.g., Pro-Ethics Program and the Brazilian Pact for Business Integrity).



MAIN CONTACTS



PARTNER
SÃO PAULO
MICHEL SANCOFSKI
MSANCOFSKI@MAYERBROWN.COM



PARTNER
BRASÍLIA
LUÍS ADAMS
LADAMS@MAYERBROWN.COM



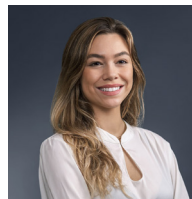
COUNSEL
SÃO PAULO
MARIA EUGENIA KANAZAWA
MKANAZAWA@MAYERBROWN.COM



ASSOCIATE
RIO DE JANEIRO
LUIZ SANTIAGO FILHO
LSANTIAGO@MAYERBROWN.COM



ASSOCIATE
BRASÍLIA
LOUISE DIAS
LODIAS@MAYERBROWN.COM



ASSOCIATE
RIO DE JANEIRO
LORENA BITTELO BARBOSA
LBARBOSA@MAYERBROWN.COM



ASSOCIATE
SÃO PAULO
ISABELLA SORROCHE ZAMBO
IZAMBO@MAYERBROWN.COM



ASSOCIATE
BRASÍLIA
LUCAS ROCHA
LROCHA@MAYERBROWN.COM

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