

**CONTRIBUIÇÕES DA CONTROLADORIA-GERAL DA UNIÃO AO GUIDANCE NOTE FOR THE
PROVISION OF INFORMATION BY STATES PARTIES FOR THE THIRTEENTH MEETIN OF THE
WORKING GROUP ON THE PREVENTION OF CORRUPTION
MARÇO DE 2022**

Information requested from States parties in relation to promoting the use of information and communications technologies (ICT) for the implementation of the Convention.

**1. In relation to integrity in public procurement and management of public finances
(article 9)**

The Brazilian Office of the Comptroller General (CGU) uses information and communications technologies as part of its anti-corruption effort of promoting social control and oversight. There are several tools, dashboards and projects that can be mentioned in this field:

Transparency Portal

The [Transparency Portal](#), first launched in 2004, actively publishes in a user-friendly and open format budgetary, procurement and financial information of the federal government, including transfers to states and municipalities. The Portal allows for natural language searches, has an interactive and intuitive interface, graphs and visualization resources, API tools, among others.

Public Procurement Platform

In 2021, Brazil enacted a new Public Procurement and Contract Law (n. 14,133/2021) significantly modernizing the rules and procedures related to public procurement. To comply with the new legislation and fully implement its new operational framework, the federal government developed the integrated digital public procurement platform compras.gov.br, which centralizes in a single system the different modules that make up the whole procurement cycle (e.g. supplier registration, price registries, bidding procedures, quality rating systems, standardization, contract management, dispute resolution, control activities, transparency & open data, public consultation and participation channels etc).

The system also allows public officials, government managers, suppliers, control bodies and citizens to interact with each other, thus facilitating communication and reducing transaction costs. Although it was developed by the federal government, state and local governments are allowed (and even encouraged) to join the system and conduct their procurement activities within the federal ecosystem. Considering the size of the Brazilian public sector, it is only possible to mitigate risks and improve government and social control through the use of digital and technological tools.

Dashboard - Contracts Related to Covid-19 (Painel Contratações Covid-19)

CGU saw the need to collect, process and publicize information on the prices of acquisitions carried out throughout the national territory, in order to reflect the exceptional moment of the pandemic, affected by supply shortages at a global level, which resulted in a natural increase in prices. It resulted in the development of a dashboard called "Contracts Related to Covid", an unprecedented initiative in the Public Administration ([Painel de Contratações Covid-19](#)).

The main objective of the Dashboard is to monitor the expenses of the Union, States, Federal District and Municipalities in relation to procurement and acquisition processes related to the pandemic, thus supporting the public manager, by offering in a timely manner updated parameters for procurement planning..

The dashboard is not intended to point out irregularities or undue situations, but rather to indicate instances that deserve further study and also to provide managers with a price reference for acquisitions during the pandemic period to assist them in obtaining the best value for their purchase.

Data has been collected since April 2020, using information published by federative entities in the official press (Official Gazette of the Union and States/Municipalities), as well as in the Transparency Portals maintained by each entity. In all, around 280 entities had their information monitored.

Until June 2021, the dashboard analyzed 44,955 records of acquisitions and contracts, reaching the amount of BRL 22 billion (USD 4.5 bi) made publicly available. It should be noted that, as data collection and inputs to the dashboard are still in progress, these values will increase until the end of the pandemic.

2. In relation to public reporting (article 10)

Open Data

The digitalization of the procurement cycle also reinforces Brazil's transparency and open data policies. These policies are part of a broader anti-corruption effort of promoting social control and oversight.

In line with the Open Data Policy of the federal government, all federal agencies are required to publish relevant data in an open and accessible format, which includes the data displayed on the Transparency Portal as well as procurement information. These resources are all available in a centralized website (<https://dados.gov.br/>).

The Covid-19 crisis was a real catalyst for the use of technological tools in the fight against corruption. The need to process, analyze and act upon large amounts of data and information in a timely manner, made it evident the need for the use of technology and innovative tools.

Brazil's first line of defense against corruption during Covid was based on broad transparency and social participation. The federal government adopted a strategy of active transparency as a way to maintain the necessary flexibility and agility in its public procurement while permitting the detection and prevention of abuses and illicit practices. The government is actively publishing relevant information about the Covid-19 pandemic through several easily accessible channels. The CGU created a [dedicated website](#) to gather in one place any initiative, data or information related to the fight against Covid.

New Public Integrity Dashboard (Painel de Integridade Pública)

Decree 9,203/2017, which provides for public integrity, made the adoption of integrity programs mandatory by all bodies and entities of the direct, autonomous and foundational federal public administration. In this context, the Public Integrity Dashboard gathers information and generates reports on the implementation of integrity programs by the aforementioned bodies and entities. In 2020, as recorded in the dashboard, 100% of the 186 bodies and entities covered by Decree 9,203/2017 had already established their Integrity Management Units and approved their Integrity Plans.

A new version of the dashboard ([Painel de Integridade Pública](#)) was made available to society. This version, in addition to displaying the data already reported by the bodies and entities of the direct, autonomous and foundational Federal Public Administration, brought new content and navigation resources.

The improvement of the Public Integrity Dashboard's navigation solutions was based on the suggestions collected from its users, especially from the Integrity Management Units of the agencies and entities of the Federal Executive Power, as well as CGU's officials that work in the public integrity area. This is CGU's first public consultation dashboard to migrate from the QlikView tool to Microsoft Power BI, which makes it possible to consolidate and publish information in a visual and interactive way from spreadsheets or files located in the cloud.

We highlight the following updates: i) publication of qualitative information on the implementation process of the Integrity Programs; ii) information on the existence of a specific unit responsible for risk management in the monitored institutions; iii) possibility to select an institution and compare its "status" with the entire thematic group to which it belongs; iv) possibility to export in CSV format (comma-separated-values) the set of answers for each graph; and v) display of miniature monitoring graphs, even when viewing the breakdown tables, allowing for better comparison of data during navigation.

International Recommendations Dashboard

Brazil has launched on July 27th, 2021 the "International Recommendations Dashboard" ([Painel Recomendações de Foros Internacionais](#)) created by the Office of the Comptroller General (CGU). The dashboard consolidates all recommendations Brazil received from international anticorruption forums: UN, OAS and OECD. The panel provides filters which allow the analysis of each recommendation, including the following details: subject, type of recommendation, status and public agencies involved in its implementation. CGU believes that the dashboard will be an important tool for public agents and civil society in the planning and monitoring of anticorruption public policies and actions.

3. In relation to participation of society (article 13)

Fala.BR

On 9 December 2021, the Federal Government enacted Decree 10,890/2021, which amended legislation related to whistleblower protection in the direct and indirect federal public administration. Some of the changes in the legislation include:

- The mandatory use of the integrated reporting/ombudsman platform Fala.BR by all entities of the direct and indirect federal public administration, including SOEs and mixed capital companies that receive public resources to partially or fully fund their operations. These entities are also required to provide easy access to the Fala.BR platform on their official websites and encourage users to submit their reports/communications through electronic means.
- In practice, the decree establishes the platform as the main tool for receiving, triaging, treating and responding to citizen's reports, including whistleblowers. Even physical reports made in person or by regular mail need to be digitalized and uploaded into the Fala.BR system.
- In terms of protective measures, the new regulation confers to CGU the competence to monitor the proper implementation of the decree and the protection of the identity of whistleblowers in the Fala.BR system.

Public Ombudsman System

The Fala.BR platform makes it possible to comply with the provisions of the Law on Access to Information and the Defense Code for Users of Public Services, controlling responses' deadlines and workflows provided for in these laws. With the entry into force of Law 13,709, of 2018, the General Law for the Protection of Personal Data (LGPD), the Fala.BR platform also became the channel for exercising the rights of personal data protection held by the federal government. For this purpose, the system underwent minor adjustments in order to guarantee the security of the personal data that would pass through it. In addition, with the development of whistleblower protection regulation, this channel has come to play an essential role in identity safeguarding processes, a basic assumption of defense mechanisms.

The unification of the input channel for communications and requests for access to information allows, from the point of view of the user experience, to determine to which competent institution to forward the communication simply by specifying the subject to be addressed. It also allows standardizing the process of communicating with the State, increasing the legal certainty and even allowing citizens to report anonymously. On the other hand, from the State's point of view, it allows the creation of a single database of communications, facilitating their analysis for the planning and execution of control and disciplinary actions.

Through Fala.BR, it is possible to send complaints, suggestions, reports, praises, requests, bureaucratic simplification suggestions and requests for access to information to more than 300 agencies and entities of the federal government, in addition to another two thousand instances of all entities and powers from states, municipalities and autonomous social services that joined the system. The Fala.BR platform, therefore, has become the most comprehensive tool for the administrative protection of rights, whether they are related to access to public information, the exercise of reporting rights free of retaliation, privacy rights and protection of personal data or the correct enjoyment of public services and policies. The system provides APIs - Application Programming Interfaces that allow the user to interact with the platform to register ombudsman communications through messaging applications (Facebook and Telegram).

Performance data related to ombudsman communications (reports, suggestions, requests, complaints, praises or simplification requests) are available at the dashboard [Painel "Resolveu?"](#). Data on access to information requests are extracted from the Fala.Br system and displayed at the dashboard [Painel da Lei de Acesso à Informação](#).

Both dashboards aim to give transparency and provide data to assist public managers and citizens in the exercise of control of public affairs through social participation.

Virtual Platform of the Council of Users of Public Services.

The Platform complements compliance with the provisions of the Defense Code for Public Service Users. Regulated through Decree 10.228/2020, the tool meets the need to operationalize the functioning of public service user councils, which must be created in each body or entity that makes up the Ombudsman System of the Federal Executive Branch (SisOuv).

The councils of public service users have the following attributions: (i) monitor and participate in the evaluation of the quality and effectiveness of the provision of public services; (ii) propose improvements in the provision of public services and contribute to the definition of guidelines for the adequate service to the user; and (iii) monitor and assist in the evaluation of the performance of the ombudsman offices of the Ombudsman System of the Federal Executive Branch. The Platform promotes an exchange between users and services provided (currently more than 5,000 services have been mapped in the Federal Executive Branch), and allows managers, through the ombudsman offices, to carry out consultations with such advisors, in order to test hypotheses relevant to the design or redesign of public services.

The Virtual Platform of the Council of Users of Public Services is the web system that enables interactions between the agency and councilors, who are volunteers. The system was designed to contain: (i) application for the production of surveys, which may occur in the form of consultations with counselors or in the form of survey to collect data from other segments of the population, through specific samples or without sampling predetermined; (ii) a forum for presenting ideas for improving public services, with the possibility of support, comments and a tool for flagging relevant issues to management; and (iii) interface for evaluating non-digitized services.

Information requested from States parties in relation to challenges to and good practices in anti- corruption awareness-raising, education, training and research. (article 13, 1 (c))

Distance Learning Courses

Courses with themes focused on social control are offered in the distance (virtual) modality, in partnership with the Laboratory of Information Technology and Educational Measures of the Federal University of Goiás, and can be accessed at [página da CGU](#). Lasting 20 hours each, the courses are aimed at civil servants and citizens, and address topics such as: Social Control and Citizenship; Public Transparency; Civic Education; Open Data; Training for Directors; Open Government; Ethics in Public Administration; and Social Participation.

One for all and all for one! (Programa Um por Todos e Todos por Um!)

Created in 2008, the program "One for all and all for one! For ethics and citizenship" is an initiative from the Office of Comptroller General (CGU), in partnership with Instituto Maurício de Sousa, which aims to foster in elementary school students interest in topics related to ethics and citizenship.

Through a partnership with the Ministry of Education and the National Learning Service, the program was reformulated and expanded in 2019, and began to offer educational materials for all the initial years of Elementary School, in addition to adapting these materials to a digital and interactive format, which is available online and offline. All materials - teacher's manual, student notebook, comic books, games, animated strips and animated films - are aligned with the general and specific objectives of the National Common Base Curriculum for Elementary Education.

It is a rich artistic-pedagogical project aimed at elementary school children, which provides for the participation of educators, families and the community as a whole, with the school as the main nucleus for the development of actions. The program includes magazines in physical and digital media, as well as videos and games, including applications for smartphones and tablets. The contents are passed on through stories and activities with the characters of Monica's Gang (Turma da Mônica), in an accessible and attractive language for children to experience situations in which they need to differentiate right and wrong, in ethical terms. The program disseminates values related to democracy, social participation, citizen responsibility and respect for differences.

As of March 2022, the program had reached the mark of 878,909 students, 26,800 teachers and 6,562 participating schools. The Program has been fully digitized and is now available to all public and private schools in Brazil, with an open enrollment period in 2022. With the digitization of all content, the expectation is to raise awareness of around 15.3 million first cycle students of Elementary Education in public and private schools. During the implementation of the Program, it was found that, in order to have the desired impact, it would be necessary to guarantee scale to the materials produced, so that a significant number of schools would integrate the material into their teaching routine. This perception generated the need to involve the actors responsible for the development of curricula, bringing the Ministry of Education as a key actor in the process.

CGU is working on courses aimed at Elementary School II, which will have, in addition to content, videos and games on topics related to ethics and citizenship. These courses will be available to public and private schools in Brazil for free and can be used as a teaching activity.

Additional information on the methodology of the program "One for all and all for one!" can be found at <https://www.gov.br/cgu/pt-br/educacao-cidada/programas/upt/metodologia-do-programa>.

CGU's Drawing and Writing Contest

CGU promotes the Drawing and Writing Contest (DWC), which aims to foster students' interest in topics such as social control, ethics and citizenship through critical thinking and debate on these issues within educational, family and community environments.

In the Contest, schools and teachers are asked to develop mobilization strategies and pedagogical practices to discuss these topics with students. Each year, a central theme is chosen to motivate discussions. Submissions to the DWC contest must be done individually in the classroom and be entirely original. It is believed that participation in the contest inspires debates that impact students' lives and foster their civic duty, with an impact on their daily lives and having important repercussions in their future.

The target audience of the DWC contest is elementary and high school students and youth and adult education students from public and private schools throughout Brazil. In the categories from 1st to 5th year of elementary school, students can compete with "Drawing" works. In the categories from 6th to 9th grade of elementary school and all grades of high school, including the modality of youth and adult education (EJA), students can participate with "Writing" works. Schools can also participate in the "Civic-School" category, with a "Mobilization Plan".

Over the course of the contest, CGU realized the need to develop a system to standardize and automate the receipt of drawings and essays from students. To this end, CGU implemented the Contest System (<https://concursos.cgu.gov.br/>), which allows schools to register and submit participating works. The system allowed greater control over the data of those enrolled and improved the management of the evaluation process of submissions. Another important lesson learned concerns the need to involve schools across the country in order to broaden participation. To this end, several publicity ads for the initiative were developed and made available in different media (physical posters, social media posts, animated art, among others). The DWC contest webpage contains all the necessary information, including supporting material: <https://www.gov.br/cgu/pt-br/educacao-cidada/programas/desenho-redacao>.

Information requested from States parties in relation to achieving the commitments regarding corruption prevention from the UNGASS political declaration.
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We understand that paragraphs 1-22 of the UNGASS Political Declaration comprise, to a large extent, the information that is being provided by Brazil within the scope of the evaluation of the Second Review Cycle of the International Review Mechanism.

Elaborating in detail on the actions taken by the Office of the Comptroller General to achieve these objectives would repeat much of what is being evaluated and would be an exhaustive task for the moment.

However, some points are highlighted for the purposes of this request for the next meeting of the Working Group on the Prevention of Corruption:

Anticorruption Plan

Brazil launched, in December of 2020, the Anticorruption Plan for the period of 2020-2025. The Plan is the result of a coordinated effort of the Interministerial Committee against Corruption – a Committee established in 2019 that includes the participation of the Office of the Comptroller General, the Ministry of Justice and Public Security, the Ministry of Economy, the Attorney General's Office, the Cabinet of Institutional Security and the Central Bank.

The Anticorruption Plan encompasses measures of short, medium and long term, to be implemented in the period of 2, 5 and 10 years. The main objective of the Plan is to structure and execute concrete measures to strengthen and improve mechanisms of prevention, detection and sanction of corruption and fraud within the Federal Executive Branch. It has been structured based on a diagnosis that allowed the public administration to get a better view of its responsibilities, set up by laws and regulations. The diagnosis has also gathered together the

international recommendations issued by the Follow-up Mechanism to the Implementation of the Interamerican Anti-corruption Convention (MESICIC), the OECD Working Group on Bribery and the Implementation Review Mechanism of UNCAC, which were cataloged and divided according to the subject and level of implementation.

The Plan allows the involved institutions to prioritize actions to be implemented, as well as a methodology for regularly informing the Interministerial Committee on the stage of execution of such actions and it shall be updated on an annual basis.

A panel for the follow-up of the implementation of the Plan is also under development, with the aim of making publicly available the deadlines of execution of each phase of the Anticorruption Plan and give access to the results achieved.

In that sense, we believe the Plan will respond to various commitments made in the context of the UNGASS.

Promoting Integrity

In the field of corruption prevention, the federal government, through CGU, has been developing, since 2019, joint work with the Organization for Economic Cooperation and Development (OECD), with the aim of strengthening the Integrity Policy in Brazil.

With regard to Public Integrity, the focus is on improving Integrity Management Units and on managing integrity risks in federal agencies and entities, in addition to applying behavioral science to public integrity policies.

Likewise, Brazil contracted a Public Integrity peer review from OECD – which consists of an assessment of the public integrity system of the Federal Executive Branch. This assessment will enable Brazil to formally adhere to the OECD Council's Public Integrity Recommendation and is, today, the greatest benchmark for the development and implementation of public integrity policies worldwide.

In this context, we highlight the institution of the Public Integrity System of the Federal Executive (Sipef, acronym in Portuguese), according to Decree 10,756, of 27 July 2021, which aims to increase the effectiveness of the integrity programs of ministries, autarchies and public foundations, increasing the prevention of acts of corruption in Brazil.

Sipef will coordinate activities related to public integrity in the Federal Executive, as well as establish standards for integrity measures adopted by public administration bodies and entities. The System is composed of the CGU, the central body with regulatory and technical supervision attributions, and the sectoral units (Integrity Management Units), which are responsible for managing integrity within the bodies and entities of the federal government.

The implementation of Sipef is the result of a public policy initiated more than five years ago, when the adoption of public integrity programs by individual entities was not mandatory. CGU's activities in this area began with the Public Integrity Promotion Program, which focused on training, promoting and raising awareness about the importance of preventing acts of corruption and fraud within public organizations. In 2017, the program evolved into a governance policy of the federal public administration, with the advent of Decree 9,203, of 22 November 2017, which made the establishment of integrity programs mandatory.

The decree establishing Sipef is in line with the best international practices and reflects the result of the partnership signed between the CGU and the OECD, to carry out studies related to public integrity.

Still in terms of promoting integrity, within the scope of the partnership with the OECD, CGU also implemented the Federal Public Service Values project, which was recognized as a good international practice and is already part of the Organization's dissemination portfolio in other countries.

The initiative's objectives are to build, in a participatory way, the values of the federal public administration and align the result of this construction with the OECD's public integrity strategy (OECD Handbook on Public Integrity), bringing together public and private sectors and society as participants of the project.

Technology

CGU has been increasingly incorporating the use of advanced technologies into its anti-corruption work, such as artificial intelligence and machine learning algorithms. CGU even has in its organizational structure a specific department dedicated to the collection, processing and treatment of strategic information, which relies on the intensive use of information technology resources, analyses and intelligence activities.

Examples of innovative tools currently employed by CGU:

- ALICE is an automated system using AI to identify irregular patterns in public procurement procedures and issue red flag alerts to CGU auditors for secondary analysis, helping prevent any issues before awarding the contract. The tool will be fully embedded into the procurement portal compras.gov.br.
- FARO is an ombudsman risk analysis tool that uses Natural Language Processing to triage reports received through ombudsman platform Fala.BR. In this way, CGU is able to prioritize the investigation of complaints that are more likely to result in concrete findings.
- e-Patri is an electronic system that collects, stores and analyses asset and conflict of interest declarations of public officials in the federal executive branch. Based on the information provided by the Federal Revenue System or the public officials themselves, the system carries out an automated analysis of the declarations to monitor the evolution and compatibility of public agents' assets with their lawful earnings.

Private Sector

Pro-Ethics program is the result of a joint effort between the public and private sectors to promote a more honest, ethical and transparent corporate environment in the country. The initiative consists in fostering the voluntary adoption of integrity measures by companies, by means of public recognition of those companies that, regardless of their size and field of activity, are committed to implementing measures aimed at the prevention, detection and remediation of acts of corruption and fraud.

The program was developed in partnership with the private initiative, in 2010, and has been constantly improved in order to adapt to the reality of the Brazilian market. Pro-Ethics aims to make companies aware of their relevant role in fighting corruption. By taking an affirmative stance in favor of preventing and combating illegal practices, the risk of fraud and corruption in the relations between the public and private sectors is reduced. In addition, Pro-Ethics seeks to promote good business integrity practices, inviting the private sector to take part in the fight against corruption.

The Program consists of the evaluation of companies that voluntarily submit information for analysis, by completing the Profile Analysis form and the Evaluation Questionnaire. All companies that meet the admissibility requirements provided for in the Pro-Ethics regulation will be evaluated by the Executive Secretariat of Pro-Ethics, in charge of CGU.

In the admissibility phase, it is assessed, among other things, the fiscal and labor regularity of the company, as well as if it is not included in the registries of companies punished by the government. It is also verified if the company is not responding to an administrative liability proceeding or negotiating a leniency agreement for the commitment of illicit acts under the terms of Law 12.846/2013 (Anti-Corruption Law). Based on the Profile Analysis, it is possible to determine the company's exposure to corruption risks and some of its specific needs in terms of integrity measures. The Evaluation Questionnaire consists of questions related to six areas: Top Management Commitment; Policies and Procedures; Communication and Training; Whistleblowing and Remediation Channels; Risk Analysis and Monitoring; Transparency and Social Responsibility. Each of these areas receives a score and, at the end, the company that achieves a score equal to or greater than 70 points and achieves the minimum required in each area is qualified to compose that year's Pro-Ethics list.

At each edition, an event is held to announce the annual list and deliver the Pro-Ethics seal to companies. The best integrity practices presented in the year will also be valued and publicized, in order to increase publicity around qualified companies. Thus, the company receives a notable gain in reputational image by making the list, achieving public recognition for its commitment to preventing and fighting corruption. In addition, all participating companies receive a detailed assessment of their integrity program, with suggested measures for improvement.

The development of the Program was based on benchmarks of international experiences in promoting integrity in the private sector, with its methodology evolving over the years and based on lessons learned.

At the end of each edition of Pró-Ética, a follow-up report is prepared with the results of the Program. With lessons learned, in 2014, a process of restructuring Pro-Ethics began, with the objective of adapting it to the changes brought about by the Anti-Corruption Law, also to increase the number of participants and increase publicity around the companies with positive evaluations. This restructuring ended in 2015, with the creation of a new evaluation methodology and a new way of publicizing Pro-Ethics companies.

In fact, over these years, there has been a continuous process of improving and valuing Pro-Ethics. This process will be continuously conducted to increasingly integrate this initiative into the annual calendar of the Brazilian business sector and permanently consolidate it as a reference for those who want to build and participate in a society in which business relationships, especially those with the public sector, are based on integrity, ethics, competence and respect for free competition.

Some lessons learned include, for example, extending the validity period of the Program to biannual lists (instead of annual). This is because CGU observed that companies need time to implement the improvement measures suggested in the evaluation reports. It was also observed the need for constant adaptation of the evaluation questionnaire to incorporate changes in the business environment in Brazil. All documents and further information on the Pro-Ethics program are available at: <https://www.gov.br/cgu/pt-br/assuntos/etica-e-integridade/empresa-pro-etica>.

Covid 19 - *Ex-Ante* Risk Analysis in Public Procurement

The Ministry of Health, in order to treat and mitigate the advance of the pandemic in Brazil, started to conduct emergency purchases of materials, services and supplies necessary to face the situation, without bidding proceedings, in accordance with Provisional Measure 926, of March 20, 2020, converted into Law 14,035, of August 11, 2020.

In view of this need, the federal managers requested the support of CGU, as the Internal Control Body of the Federal Executive Branch, to assess compliance aspects of these public contracts.

In this context, considering the inherent risks and the need for timely action, the Ministry of Health established a workflow to refer proceedings to CGU without the need for a formal request. In addition, the institutions agreed that the auditor's analyzes would be carried out and forwarded in a timely manner, so as not to impact the adoption of measures by the Ministry of Health with the urgency that cases require.

CGU defined requirements for analysis of acquisitions, based on a prior (*ex-ante*) analysis of the associated risks that could impact the objectives of the contract. For this, CGU elaborated a specific document, called "Guide for risk analysis in Covid-19 emergency contracts", on which the analyzes issued and forwarded to the Ministry of Health were based, as well as the recommended mitigating measures to reduce or eliminate the potential risks identified.

From March 2020 to December 2021, the aforementioned Guide was used to analyze 45 procurement proceedings conducted by the Ministry of Health, which totaled approximately BRL 28.26 billion (USD 6 bi).

As a result, 160 recommendations were issued to mitigate the risks identified in the analyzes carried out on these procurement proceedings presented by the Ministry of Health. It should be noted that recommendations remain under monitoring by CGU to verify compliance by the Ministry of Health.

As a consequence of the measures adopted by the Ministry of Health, in compliance with the proposed recommendations, procurement proceedings were canceled or revised due to, among others, evidence of fraud and manipulation of bidding proceedings, risks of favoring companies, reference prices above market prices during the pandemic, uneconomical acquisitions and incompatibility of contracts with the exceptional authorization provided for by Emergency Acquisitions Law 13,979, of 6 February 2020.

With the adoption of mitigating measures and suspension of procurement proceedings with an indication of fraud in the proposals, CGU prevented losses to the public treasury in the amount of over BRL 6 billion (USD 1.25 bi).

Conflict of Interest and Asset Declarations

In order to prevent conflict of interests, CGU developed the Electronic Conflict of Interest Prevention System (SeCI), which enables public agents of the Federal Executive Branch to submit consultations and requests for authorization to exercise private activities.

Consultations and authorization requests submitted through SeCI are based on the Law on Conflict of Interest (Law 12,813/2013) and Interministerial Ordinance 333, of the Ministry of Planning and CGU, also of 2013.

Decree 10,571/2020 provides that public agents' asset declarations must be submitted electronically, using a system developed by CGU specifically for this purpose: e-Patri. The decree also established instruments for CGU to monitor the evolution of assets, not only of public agents of the direct administration, but also of the employees, directors and advisers of state-owned companies, including those companies whose operating costs are not funded by the Public Treasury.

The e-Patri system was launched in December 2021. The system will enable CGU to carry out a systematic and large-scale analysis of the asset information that will be sent annually by the civil servants of the Federal Executive Branch to monitor the asset evolution of these public agents to verify the compatibility of their assets with the resources they officially receive.

Survey on Ethics and Corruption in the Public Service

The Survey on Ethics and Corruption in the Public Service was conducted between April 27 and May 28, 2021 - as part of CGU Action 26 of the Federal Government's Anti-Corruption Plan. The initiative was led by the World Bank and developed in several countries. In Brazil, it aims to better understand the experiences, perceptions and ideas of Brazilian federal public agents regarding the ethical challenges they face in their daily work.

The survey was supported by the Brazilian government, through CGU and the National School of Public Administration, and joins the global research effort to generate current data on the phenomenon of corruption, giving due voice to participating public servants, with the protection/confidentiality of their responses guaranteed by the World Bank. It should be noted that the survey was based on the work of the World Bank's Bureaucracy Laboratory, which specializes in Public Administration empirical studies through surveys, and interviewed at least 250,000 public servants in more than 35 countries. Similar surveys on the topic of corruption are currently being implemented in Madagascar, Bangladesh and Pakistan.

The aggregated results will serve as input for the improvement of measures aimed at preventing corruption in Brazil.