

# Investing in Ethics is a good deal.



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**Brazil's Federal Government**

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# Pro-Ethics Company Registry

## What is it?

- It is a national registry for Companies Committed to Ethics and Integrity
- It is not a Certificate: being part of the Registry does not mean the company is certified by, or receives a certificate from, the government
- It represents a public and voluntary commitment which indicates the companies take several measures aimed at preventing and fighting corruption within the company and its supply chain

# Pro-Ethics Company Registry

## General Aim:

- To promote an environment in the private sector in which business transactions can lie on integrity and confidence;
- To promote the idea that corruption is a problem that needs to be prevented and fought not only by public sector, but also by the private sector and society

## Specific Aims:

- To give visibility to companies that invest in ethics, integrity and corruption prevention and engage in establishing a confidence-building environment for the public and private sectors.
- To advertise companies which share the understanding that corruption is an issue that has to be addressed not only by the public sector, but also by the private and civil sector

# Pro-Ethics Company Registry

Gains for the companies:

- **Image:**

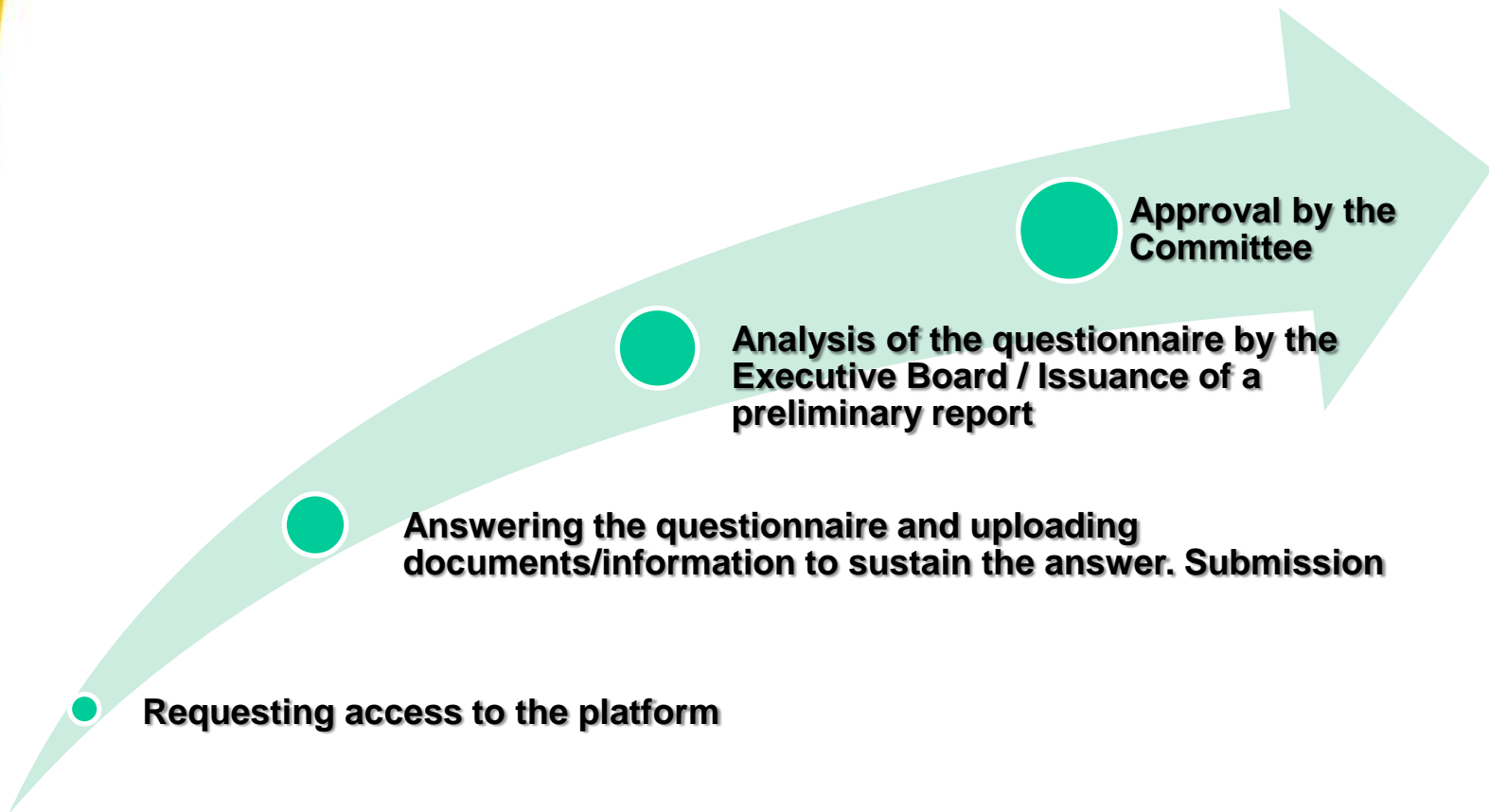
Companies can advertise and exploit the benefits of having their images associated with ethics, integrity and the Controladoria-Geral da União (Office of the Comptroller General).

- **Direct benefits**

- improving internal control;
- organizational culture;
- effect the supply chain: promote integrity and confidence in the business transactions

# Pro-Ethics Company Registry

## Adhesion Procedure





Empresa  
PRÓ-ÉTICA

Parceria:  
CGU & Instituto Ethos

Cadastro Empresa  
Pró-Ética

Parceira CGU  
& Ethos

Conversa com  
Empresas

Integridade no  
Setor Privado

Documentos e  
Publicações

Convenções  
Internacionais

## O Cadastro Empresa Pró-Ética

O Cadastro Nacional de Empresas Comprometidas com a Ética e a Integridade - Cadastro Empresa Pró-Ética, é uma iniciativa da Controladoria-Geral da União e do Instituto Ethos que avalia e divulga as empresas voluntariamente engajadas na construção de um ambiente de integridade e confiança nas relações comerciais, inclusive naquelas que envolvem o setor público.

O Cadastro dará visibilidade às empresas que compartilham a idéia de que a corrupção é um problema que deve ser prevenido e combatido não só pelo governo, mas também pelo setor privado e pela sociedade. Ao se cadastrar, a organização assume o compromisso público e voluntário, perante o governo e a sociedade, de que adota medidas para prevenir e combater a corrupção dentro de sua instituição, em favor da ética nos negócios. [Saiba mais](#)

Confira aqui a lista de  
empresas cadastradas



## COMO ADERIR AO CADASTRO EMPRESA PRÓ-ÉTICA

Conheça o  
Regulamento

- 1º Preencha e faça o envio online do Formulário Eletrônico de Solicitação de Adesão
- 2º Após recebimento de login e senha, entre no site do Cadastro e clique em Acessar Plataforma
- 3º Na plataforma, responda o Questionário Avaliativo
- 4º Após o preenchimento total, submeta seu questionário
- 5º Aguarde aprovação do Comitê Gestor
- 6º Assine o Termo de Compromisso com a Ética e a Integridade e passe a ser integrante do Cadastro Empresa Pró-Ética

DETALHES DO PROCESSO DE ADEÇÃO



# Pro-Ethics Company Registry

## Members of the Committee

Ministério do  
Desenvolvimento, Indústria  
e Comércio Exterior

Controladoria-Geral  
da União



INSTITUTO  
**ETHOS**

**FEBRABAN**  
Federação Brasileira de Bancos

**IBRACON**  
INSTITUTO DOS AUDITORES INDEPENDENTES DO BRASIL



**BM&FBOVESPA**  
A Nova Bolsa



**ApexBrasil**  
AGÊNCIA BRASILEIRA DE PROMOÇÃO  
DE EXPORTAÇÕES E INVESTIMENTOS



# **Pro-Ethics Company Registry**

## **Analysis Procedure**

- Once the questionnaire is submitted, the Executive Board drafts a report which will be evaluated by the Committee;
- The Executive Board keeps constant contact with the representatives of the company during the drafting of the report;
- When needed, the Executive Board will ask the company to make all the amendments necessary to the questionnaire and, if necessary, provide additional documents and information



# Pro-Ethics Company Registry

## Follow-up

- In the event of rejection, the company is still assisted by the Executive Board, which may suggest the adoption of measures and actions aiming at improving the company's compliance program
- The Executive Board is always available to clarify the doubts of companies that wish to adhere to the registry

# Pro-Ethics Company Registry

## Case Study

- The company Dudalina requested access to the questionnaire on July 5<sup>th</sup>, 2011
- It submitted its questionnaire for analysis on July 27, 2011
- Was rejected by the Committee on December 1<sup>st</sup>, 2011, during the first round
- Submitted a new questionnaire on Mai 10<sup>th</sup>, 2012, during the third round, being once again rejected by the Committee
- On September 16<sup>th</sup>, 2012, during the forth round, it was approved by the Committee and adhered to the Registry

With the Executive's Board help, Dudalina implemented and enhanced its compliance program and became a part to the Pro-Ethics Company Registry!

# Companies in the Registry

3M do Brasil

AES Eletropaulo

AES Sul

AES Tiete

Banco do Brasil

Caixa Econômica Federal

Celesc

CPFL Energia

Dudalina

Duratex

EDP Energias do Brasil

Infraero

Johnson Controls Building Efficiency

Siemens

- **116 companies requested access**
- **26 companies submitted their questionnaire for analysis**
- **14 companies were approved by the Committee**

# Pro-Ethics Company Registry

## Requirements for Approval

- Provide evidence of the adoption of all the 30 mandatory measures
- Provide evidence of the adoption of at least 50% of the 36 desirable measures
- Have a regular status before tax authorities
- Not be in the Brazilian National Registry of Debarred and Suspended Companies (*Cadastro Nacional de Empresas Inidôneas e Suspensas – CEIS*)

# Pro-Ethics Company Registry

Evaluated areas:

- Ethics and conduct
- Internal controls
- Relationship with the public sector (or with the private sector, in case of the state owned companies)
- Training and Empowerment
- Transparency
- Collective actions

# Ethics and Conduct

- **Public commitment**  
Does the company make public its commitment to ethics and integrity and its engagement on fighting corruption? (mandatory measure)
- **High management involvement**  
Is the company's high management committed to ethics and integrity and involved in the company's policies regarding the matter? (mandatory measure)
- **Code of Conduct/Ethics**  
Does the company have a code of conduct/ethics or any other equivalent document that sets forth standards and conducts for its employees and partners? (mandatory measure)
- **Ethics Committee**  
Does the company have an Ethics Committee or any other sector responsible for such matter? (mandatory measure)
- **Contact Channels**  
Does the company make available internal contact channels which provide information and clarify doubts on legal and ethical matters? (mandatory measure)



# Internal Controls

- **Internal Audit**  
Does the company have an internal audit unit or any other sector responsible for that matter? (mandatory measure)
- **External Audit**  
Is the company subject to the work of independent external auditors? (mandatory measure)
- **Whistleblowing Channels**  
Are there whistleblowing channels for the purpose of receiving complaints, and information on corrupt acts, from employees, partners and costumers? (mandatory measure)
- **Whistleblower Protection**  
Does the company offer any protection to whistleblowers (for example, anonymous whistleblowing, dismissal prohibition, etc)? (mandatory measure)
- **Risk Assessment**  
Does the company have policies the aim at the prevention and management of risks of frauds and corruption? (desirable measure)
- **Philanthropic Donations and Sponsoring**  
Does the company have transparent and clear rules regarding philanthropic donations and sponsoring? (desirable measure)

# Relation to the Public Sector\*

\* For state owned companies, the relation to the private sector is evaluated

- **Relation**

Does the company have any area or person directly responsible for the relation to the public sector? (desirable measure)

- **Rules of Conduct**

Does the company have clear rules of conduct for the relation to the public sector in order to prevent acts of corruption? (mandatory measure)

- **Preventing Conflict of Interests**

Does the company have rules and policies concerning the prevention of conflict of interests between the public and the private sector? (mandatory measure)

- **Campaign Funding**

Does the company have a clear and public policy concerning the funding of politicians campaigns? (mandatory measure)

# Training and Empowerment

- **Training Policy**

Does the company offer its employees training on matters related to ethics and businesses integrity? (mandatory measure)

- **Encouragement to Participate**

Does the company encourage its employees to take part in trainings on ethics, integrity and fighting corruption? (desirable measure)

- **Management Positions**

Does the company offer specific training on ethics and integrity to the holders of high management positions? (desirable measure)

# Transparency

- **Identification of the Board of Directors**  
Does the company make public the names of the members of its Board of Directors and other executives on its website? (desirable measure)
- **Financial Statements**  
Does the company make its financial statements public? (mandatory measures)
- **Procurement and Agreements**  
Does the company's transparency policy sets forth the release of information on procurement and agreements with the public sector? (desirable measure)
- **Sustainability**  
Does the company make public its sustainability report? (desirable measure)

# Collective Actions

- **PACI**

Does the company take part in the Partnering Against Corruption Initiative - PACI? (desirable measure)

- **Global Compact**

Is the company a part to the United Nations Global Compact? (desirable measure)

- **Other Actions**

Does the company take part in any other collective action the aim at preventing and fighting corruption by means of the partnership with other companies/entities? (desirable measures)

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