

Prospects for the Fight against Corruption in Brazil in 2025: An analysis in light of the CGU guidelines

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Authors

Anna Carolina Malta
Spilborghs

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Over the last 11 years, since Law 12.846/2013 (the Anti-Corruption Law) came into effect, Brazil has made significant progress in improving anti-corruption mechanisms. This progress can be seen in the adoption of rules and regulations, the publication of best practice manuals, the strengthening of administrative procedures for investigating and suppressing illicit conduct, and fostering the implementation of compliance and integrity programs in both the private and public sectors.

One of the main actors in Brazil's anti-corruption policy is the Office of the Comptroller General ("CGU" – *Controladoria Geral da União*). In 2024, the CGU published Volume II of the guide "Integrity Programs: Guidelines for Private Companies" (Programa de integridade: diretrizes para empresas privadas), which expands the concept of compliance and integrity programs to cover new legislation and market practices, and provides recommendations for implementing such programs in private organizations. The CGU also issued Directive (*Portaria Normativa*) 155, dealing with the making of administrative settlements (known as "terms of commitment") under the Anti-Corruption Law. Last, Decree 12.304/2024, signed by the Minister of the CGU together with the President of the Republic, makes implementation of a compliance and integrity program a requirement for companies that participate in federal procurement procedures for contracts worth more than BRL 239 million.

One of the CGU's most sweeping changes was the creation of the "Integrity and Anti-Corruption Plan 2025-2027". The plan is a collaborative effort, developed with the involvement of various ministries, administrative agencies, representatives of civil society, academics, and private sector entities. The CGU's aim was to establish a set of actions designed to strengthen integrity, prevent and combat corruption, and design measures that will reinforce public programs and policies, promote public and private integrity, and increase transparency.

In essence, the Integrity and Anti-Corruption Plan 2025-2027 aims to promote a more transparent and ethical government, with continuous monitoring by the Transparency, Integrity and Anti-Corruption Council.

The plan is structured around five thematic pillars: (i) Monitoring the Quality of Public Resource Use, aimed at strengthening oversight and control mechanisms for public policies; (ii) Integrity in State-Public Sector Relations, which seeks to promote ethics and governance in public-private interactions; (iii) Transparency and Open Government, focused on increasing access to public information; (iv) Fighting Corruption, which proposes strategies to improve the suppression of illicit activities and ensure the effectiveness of public policies; and (v) Reinforcing Institutional Integrity, aimed at reducing

vulnerabilities and strengthening an ethical culture in public organizations.

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Anna Carolina Malta Spilborgs