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## PARTICIPANTS' PAPERS

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### ANTI-CORRUPTION STRATEGIES IN BRAZIL: CHALLENGES, PROGRESS AND GLOBAL SYNERGIES

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#### I. CORRUPTION AS A SYSTEMIC PHENOMENON

Corruption constitutes a global challenge that transcends borders, negatively impacting socio-economic development, especially in emerging countries and with the potential to undermine public confidence in their democratic institutions.

Corruption in Brazil is not limited to isolated incidents; it is characterized by a systemic nature, deeply rooted in government and business spheres. This Brazilian peculiarity generates substantial socio-economic impacts (especially affecting its poor population), distorts markets and imposes significant barriers to progress, as demonstrated by the two most emblematic cases below.

#### II. OPERATION PANDORA'S BOX

Operation *Pandora's Box* was launched on 27 November 2009 and revealed one of the largest corruption schemes in the country's capital, Brasília, involving the payment of bribes to district deputies, secretaries and political allies of the then governor.<sup>1</sup> The scheme worked as follows: technology entrepreneurs, hired by the local government to provide services, paid bribes to secure public contracts. The money was then passed on to members of parliament and allies of the governor, delivered in envelopes or suitcases.

Videos recorded by the whistle-blower in the scheme, the Federal District's Secretary of Institutional Relations, showed the delivery of bundles of cash to representatives, aides and the governor himself. In these videos, members of parliament are seen stuffing the money they received into bags, jackets and socks and even "praying" over the money, thanking God for the bribe.<sup>2</sup>

The scandal ousted the local governor, who was placed under preventive arrest, sparked political intervention in the Federal District and opened criminal and civil proceedings, dragged on for over a decade. Several district representatives were charged with passive corruption. However, more than fifteen years after the events, the lawsuits were dismissed due to limitation.<sup>3</sup>

Operation *Pandora's Box* was a landmark in the fight against corruption in Brazil and revealed how it is structured within political and business circles. *Pandora's Box* anticipated investigative techniques that would be used years later in Operation *Car Wash*, such as plea bargains, the use of hidden videos, cooperation between the police and the public prosecutor's office and the need to focus on systemic corruption.<sup>4</sup>

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<sup>1</sup> G1. *Operation Pandora's Box: understand the scandal that led to Arruda's arrest*. Rio de Janeiro: G1, November 27, 2009. Available at: <https://g1.globo.com/>. Accessed on: 27 July 2025.

<sup>2</sup> O GLOBO. *Videos show deputies receiving money from Durval Barbosa*. Rio de Janeiro: O Globo, 28 November 2009.

<sup>3</sup> PUBLIC PROSECUTOR'S OFFICE OF THE FEDERAL DISTRICT AND TERRITORIES (MPDFT). *Report on institutional action in the Pandora's Box case*. Brasília: MPDFT, 2010.

<sup>4</sup> GOMES, Luiz Flávio. *Systemic corruption and criminal response*. São Paulo: Saraiva, 2015; LOPES JR., Aury. *Criminal procedural law and its constitutional conformity*. 6th ed. São Paulo: Saraiva, 2017.

### III. OPERATION CAR WASH

Operation *Car Wash* revealed the largest known corruption case in the country, consisting of a complex network of bribes and embezzlement that extends across various sectors of the economy and politics, at the federal level.<sup>5</sup>

It began in March 2014 with a money laundering investigation at a small petrol station, again in the country's capital. The investigation expanded and uncovered a massive corruption scheme within the Brazilian federal government, with a particular focus on state-owned companies such as "Petrobras – Petróleo Brasileiro S/A", the country's largest oil company and the fifteenth largest in the world.<sup>6</sup>

The investigation, conducted by a team of prosecutors from the Federal Public Prosecutor's Office, revealed that Petrobras was used as an instrument to embezzle billions of public funds, involving construction companies, politicians and directors of the state-owned company.<sup>7</sup>

Construction companies formed a cartel to rig Petrobras bids and paid millions in bribes to Petrobras directors and politicians in exchange for inflated contracts. The money was diverted to an illicit fund and then laundered through small businesses, including car washes and petrol stations, to finance political campaigns, bribe politicians and personally enrich the businesspeople.

Operation *Car Wash* led to the recovery of 25 billion reais (approximately US\$4.5 billion) in fines and restitution of embezzled funds. It resulted in more than two hundred convictions for crimes such as corruption, money laundering and abuse of the international financial system. For these convictions, the "plea bargain" law was once again crucial, encouraging executives and businesspeople to provide information that broadened the scope of the investigations.<sup>8</sup>

However, by subsequent decision of the Supreme Federal Court, all convictions were overturned, citing procedural irregularities and the judge's bias in handling the cases. The cases were restarted in Brasília and, for the most part, dismissed due to statute of limitations or lack of admissible evidence. The annulment of the cases undermined the credibility of the justice system, caused a setback in institutional cooperation, demobilized the anti-corruption system and generated a sense of impunity among the country's citizens.<sup>9</sup>

The impact of *Operation Car Wash* was far-reaching and involved millionaire businesspeople, members of parliament, senators, governors, ministers and the president.

The judicial setback and the annulment of evidence in *Operation Car Wash* and *Pandora's Box* highlight a critical point in the fight against corruption in Brazil: that the battle against corruption in Brazil is not limited to the discovery of illicit acts, but also to the procedural legitimacy of investigations, the sustainability of convictions and the effective recovery of misappropriated funds.

Excessive investigations, the impartiality of judges and the constant shifting of the Supreme Court's interpretations reveal inconsistencies and divergences among actors that can undermine the legal certainty, effectiveness and public legitimacy of anti-corruption efforts.

<sup>5</sup> CORRUPTION IN BRAZIL: the scandal that arrested politicians. YouTube, 2017. Available at: <https://www.youtube.com/watch?v=6eyBWX3hVaE> . Accessed on: 27 July 2025.

<sup>6</sup> COUNCIL ON FOREIGN RELATIONS. *Brazil's Corruption Fallout*. Available at: <https://www.cfr.org/backgrounder/brazils-corruption-fallout> . Accessed on: 27 July 2025.

<sup>7</sup> OPERATION CAR WASH. *Wikipedia* . Available at: [https://en.wikipedia.org/wiki/Operation\\_Car\\_Wash](https://en.wikipedia.org/wiki/Operation_Car_Wash) . Accessed: July 27, 2025.

<sup>8</sup> DEPARTMENT OF JUSTICE (USA). *J&F Investimentos SA pleads guilty and agrees to pay over \$256 million*. Available at: <https://www.justice.gov/archives/opa/pr/jf-investimentos-sa-pleads-guilty-and-agrees-pay-over-256-million-resolve-criminal-foreign> . Accessed on: 27 July 2025.

<sup>9</sup> BBC BRAZIL. *Supreme Court annuls Lava Jato convictions*. Available at: <https://www.bbc.com/portuguese/brasil-56444662>. Accessed: 22 July 2025.

It is therefore necessary to balance the tension between aggressive investigative tactics, necessary to unravel complex schemes and strict adherence to due process. In this regard, the balanced performance of the Public Prosecutor's Office, with its teams of prosecutors and the judiciary, is essential to ensure both effectiveness and legitimacy, preventing procedural errors from undermining substantive justice. Otherwise, they create vulnerabilities for legal challenges and reversals of decisions, compromising the system's ability to deliver justice consistently.

The “silver lining” of these judicial overturns is that they also created opportunities for systemic change and for deeper public debate on corruption, with a demand for greater accountability.<sup>10</sup>

#### IV. FRUITS AND EXPERIENCE THAT DESERVE TO BE SHARED

The public nature of these scandals, amplified by the media, contributed to a greater demand for transparency, accountability and responsibility. This public pressure acts as a check, albeit not institutionalized, on corruption, driving legislative reforms for better law enforcement.<sup>11</sup>

From then on, anti-corruption strategies in Brazil focused on preventive action, through the creation of laws and institutional reforms. The country has a constantly evolving regulatory framework, examples of which include the Corporate Anti-Corruption Law, the State-Owned Companies Law (Law No. 13,303/2016) and the Anti-Crime Package (Law No. 13,964/2019), mentioned below. Due to their significant importance, these laws deserve further detail and explanation.

The Corporate Anti-Corruption Law (Law No. 12,846/2013) came into effect in 2014 and holds companies civilly and administratively liable for acts of corruption against public administration, regardless of fault. It encourages compliance programmes and allows for leniency agreements with agencies such as the CGU (Comptroller General's Office).<sup>12</sup>

The Leniency Agreement Framework (Decree No. 11,129/2022) regulated the Anti-Corruption Law, generating greater legal certainty and established clear criteria for companies to collaborate in exchange for benefits and reduced sanctions.<sup>13</sup>

The State-Owned Enterprises Law (Law No. 13, 303/2016) established strict rules for governance, tendering and risk management in public companies. It seeks to protect state-owned companies from political interference and illegal practices.<sup>14</sup>

The new Bidding and Contracts Law (Law No. 14,133/2021) replaced the previous one (Law 8,666/1993) and introduced modern control and accountability devices, such as the requirement for integrity programmes in large-scale contracts and greater transparency and oversight.<sup>15</sup>

The Anti-Crime Package (Law No. 13, 964/2019) reformed the Penal Code, the Code of Criminal Procedure and the Penal Enforcement Law. It introduced the non-prosecution agreement (ANPP) into the legal system, which requires a recorded confession from the accused, provided clearer rules for plea bargains and created the guarantee judge to avoid nullities based on the argument of the judge's impartiality.<sup>16</sup>

<sup>10</sup> GOMES, Luiz Flávio. *Systemic corruption and criminal response*. São Paulo: Saraiva, 2015.

<sup>11</sup> ARANTES, Rogério B. *Public Prosecutor's Office and Politics in Brazil*. São Paulo: Educ, 2002.

<sup>12</sup> BRAZIL. Law No. 12,846 of 1 August 2013. Provides for the administrative and civil liability of legal entities. Available at: [https://www.planalto.gov.br/ccivil\\_03/\\_ato2011-2014/2013/lei/112846.htm](https://www.planalto.gov.br/ccivil_03/_ato2011-2014/2013/lei/112846.htm)

<sup>13</sup> BRAZIL. Decree No. 11,129 of 11 July 2022. Regulates Law No. 12,846/2013. Available at: <https://www.in.gov.br/en/web/dou/-/decreto-n-11.129-de-11-de-julho-de-2022-416887933>

<sup>14</sup> BRAZIL. Law No. 13,303 of 30 June 2016. Establishes the legal status of state-owned companies. Available at: [https://www.planalto.gov.br/ccivil\\_03/\\_ato2015-2018/2016/lei/113303.htm](https://www.planalto.gov.br/ccivil_03/_ato2015-2018/2016/lei/113303.htm)

<sup>15</sup> BRAZIL. Law No. 14,133 of 1 April 2021. New Law on Public Tenders and Administrative Contracts. Available at: [https://www.planalto.gov.br/ccivil\\_03/\\_ato2019-2022/2021/lei/114133.htm](https://www.planalto.gov.br/ccivil_03/_ato2019-2022/2021/lei/114133.htm)

<sup>16</sup> BRAZIL. Law No. 13,964 of 24 December 2019. Anti-Crime Package. Available at: [https://www.planalto.gov.br/ccivil\\_03/\\_](https://www.planalto.gov.br/ccivil_03/_)

This package of laws allows the Public Prosecutor's Office to negotiate collaboration agreements with those under investigation without the participation of the judge, bringing greater speed in the recovery of assets and putting an end to the claim of impartiality of the judge, since he does not participate in the act.<sup>17</sup>

In addition to modernizing the aforementioned legislative framework, Brazil began to use technological platforms and mechanisms such as artificial intelligence to combat corruption.

For example, the "Fala.BR" platform was created to connect the public and unify reporting channels and access information on public contracts. Other platforms, such as the Public Integrity System (SIP),<sup>18</sup> the Correction Dashboard, Anti-Corruption Radar and the "+Brasil" Platform, integrate data on agreements, transfers and sanctions applied to companies. These data are also available for public consultation, providing greater transparency into the use of public resources.<sup>19</sup>

Bodies responsible for preventing and combating corruption, such as the CGU – Comptroller General of the Union, COAF – Financial Activities Control Council (COAF), the Federal Police and the Public Prosecutor's Office, already existed, but began to use artificial intelligence and big data in audits and investigations and were strengthened with integrated actions, through ENCCLA.<sup>20</sup>

ENCCLA – the National Strategy to Combat Corruption and Money Laundering – is a permanent and inter-institutional forum, which brings together more than 90 bodies from the three branches of government (Prosecutor's Office, Federal Police, CGU, COAF, Federal Revenue Service, among others) designed to discuss, formulate and propose public policies aimed at preventing and repressing corruption, money laundering and related crimes.<sup>21</sup>

Each year, ENCCLA holds plenary meetings with representatives from participating agencies. These meetings define concrete actions to be implemented in the following year, known as ENCCLA actions. ENCCLA's actions and results include the enactment of Law No. 12,683/2012 – which reformed the Money Laundering Law; the creation of the Bank Transactions Investigation System (SIMBA); and proposals to regulate lobbying and conflicts of interest between the public and private sectors.<sup>22</sup> ENCCLA is cited by organizations such as the OECD, FATF and UNODC as a good Brazilian institutional practice, due to its form of inter-institutional cooperation and focus on results.<sup>23</sup>

Other examples are the technological tools developed by the Comptroller General of the Union – CGU, ROSIE and ALICE, created to detect signs of irregularities and corruption.<sup>24</sup>

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ato2019-2022/2019/lei/113964.htm

<sup>17</sup> BRAZIL. Law No. 13,964 of 24 December 2019. Available at: [https://www.planalto.gov.br/ccivil\\_03/\\_ato2019-2022/2019/lei/113964.htm](https://www.planalto.gov.br/ccivil_03/_ato2019-2022/2019/lei/113964.htm) . Accessed on: 22 July 2025.

<sup>18</sup> CGU – Comptroller General of the Union. *Fala.BR – Integrated Ombudsman and Access to Information Platform*. Available at: <https://falabr.cgu.gov.br>. Accessed on: 27 July 2025.

<sup>19</sup> CGU – Comptroller General of the Union. *Systems and Panels*. Available at: <https://www.gov.br/cgu/pt-br/governanca/integridade-publica>. Accessed on: 27 July 2025.

<sup>20</sup> CGU – Comptroller General of the Union. *Anti-Corruption Radar*. Available at: <https://www.gov.br/cgu/pt-br/governanca/integridade-publica/radar-anticorruptao>. Accessed on: 27 July 2025.

<sup>21</sup> ENCCLA – National Strategy to Combat Corruption and Money Laundering. *About ENCCLA*. Available at: <https://enccla.camara.leg.br>. Accessed: 27 July 2025.

<sup>22</sup> BRAZIL. Law No. 12,683 of 9 July 2012. Amends Law No. 9,613 of 3 March 1998. Available at: [https://www.planalto.gov.br/ccivil\\_03/\\_ato2011-2014/2012/lei/112683.htm](https://www.planalto.gov.br/ccivil_03/_ato2011-2014/2012/lei/112683.htm). Accessed on: 27 July 2025.

<sup>23</sup> OECD. *Implementing the OECD Anti-Bribery Convention: Phase 4 Report – Brazil*. Paris: OECD Publishing, 2017. Available at: <https://www.oecd.org/corruption/anti-bribery/Brazil-Phase-4-Report-ENG.pdf> . Accessed: 27 July 2025.

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UNODC. *Country Review Report of Brazil – UNCAC Implementation Review Mechanism*. Vienna: UNODC, 2016. Available at: <https://www.unodc.org> . Accessed on: 27 July 2025.

<sup>24</sup> CGU – Comptroller General of the Union. *Technology in Corruption Prevention: Rosie, Alice and Other Innovations*. Brasília, 2022. Available at: <https://www.gov.br/cgu/pt-br> . Accessed on: 27 July 2025.

ROSIE – Systematic Observation Robot of the Structured Internet is an automated system created to monitor and analyse public expenditure, with a special focus on federal parliamentarians' spending. It scans data on funds remitted to parliamentarians and detects suspicious patterns such as duplicate reimbursements, suspicious invoices and unusual expenses on food, fuel and car hire, using machine learning algorithms and predefined rules.<sup>25</sup> ROSIE has already helped identify, for example, the misuse of the parliamentary quota, such as deputies who reimbursed meals at times incompatible with their working hours or in locations far from their parliamentary residence.<sup>26</sup>

ALICE – Bid and Contract Analysis is a system that uses artificial intelligence to analyse public notices, contracts and bids, identifying risks of corruption, overpricing or fraud. It automatically analyses the texts of notices and contracts published on the Transparency Portal and the +Brasil Platform and flags generic or overly restrictive terms in contracts (which may bias the contract towards a particular company), the lack of objective contracting criteria or the absence of broad competition. ALICE has already helped prevent problematic contracts and guides public administrators on best practices, as well as assisting in focusing CGU audits, optimizing team allocation.<sup>27</sup>

The Anti-Crime Law Package, ENCCLA, Rosie and Alice are examples of tools for improving the performance of anti-corruption and oversight agencies. They focus on transparency, efficiency and integrity and contribute to the detection of illicit activities and crime prevention. They are the result of Brazil's experience in combating corruption that deserve to be shared.<sup>28</sup>

## V. LEARNING TO ADVANCE: THE IMPORTANCE OF SHARING KNOWLEDGE AND EXPERIENCES

Although *Operation Car Wash* brought unprecedented accountability to the country, subsequent criticism and the annulment of all resulting legal proceedings undermine the long-term credibility of the justice system. This legal uncertainty could hinder future anti-corruption efforts and, by extension, weaken the very democratic institutions that uphold the rule of law.

Throughout its history, Brazil has implemented several initiatives to combat corruption. An analysis of the strategies adopted reveals a complex landscape, characterized by notable progress and persistent challenges. The emergence of new corruption cases, even after the implementation of significant measures, suggests that existing strategies may be insufficient or easily circumvented. In this scenario, international cooperation and the exchange of experiences with other countries emerge as valuable components for a more effective criminal response.

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<sup>25</sup> Ibid.

<sup>26</sup> CGU – Comptroller General of the Union. *Rosie Robot: CGU uses artificial intelligence to monitor the use of the parliamentary quota*. Brasília, 2019. Available at: <https://www.gov.br/cgu/pt-br>. Accessed on: 27 July 2025.

<sup>27</sup> CGU – Comptroller General of the Union. *ALICE Tool: CGU uses artificial intelligence to analyze bidding notices*. Brasília, 2020. Available at: <https://www.gov.br/cgu/pt-br>. Accessed on: 27 July 2025.

<sup>28</sup> ENCCLA – National Strategy to Combat Corruption and Money Laundering. *Reports and Actions*. Available at: <https://enccla.camara.leg.br>. Accessed: 27 July 2025.

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