

AC1.1. If yes, in what year was this programme last reviewed? (YYYY)

	(YYYY)
Programme last reviewed	

Please provide additional explanation: _____

SETI does not have its own anti-corruption policy, however, it follows the guidelines of the Government of Paraná, as per the regulations below:
Decree No. 11953/2018 – Regulation of the Anti-Corruption Law in the State of Paraná, which regulates, within the scope of the Executive Branch of the State of Paraná, the application of Federal Law No. 12,846 of 08/01/2013, which provides for administrative and civil liability of legal entities for the performance of acts to the Public Administration.

Law No. 20663/2021 – Establishes the month Transparent December in the Official Calendar of Events of the State of Paraná, dedicated to promoting actions aimed at implementing a culture of transparency, prevention and combating corruption throughout the year.

Law No. 19984/2019 – Establishes the State Fund to Combat Corruption and provides other measures.

Decree No. 5880/2020 – Makes it mandatory for bodies and entities of the Public Administration of the State of Paraná to register and keep updated all data and information with the Materials, Works and Services Management System – GMS, considering that all records entered in the GMS:
i) are shared in real time with the Transparency Portal of the State of Paraná, an essential social control instrument for preventing and combating corruption, as well as for the probity of procedures and improving the integrity of government bodies;
ii) promote the improvement of the efficiency and effectiveness of public procurement, in addition to curbing the practice of fraud, errors and illegalities in bidding procedures, as well as enabling other benefits arising from the integration of information stored in the information technology systems used by the State; and
iii) have a positive impact and favor internal and external control, transparency and social control actions [...].

Law No. 19857/2019 – Establishes the State Public Administration Integrity and Compliance Program and provides other measures.

Decree No. 2902/2019 – Regulates Law No. 19857/2019, which established the State Public Administration Integrity and Compliance Program.

The SETI Integrity Plan is in the execution phase to monitor the proposed mitigation measures, including the Risk and Responsibility Matrix.

Decree No. 38/2015 – Established the Code of Ethics for Senior State Administration.

The Code of Ethics for Public Servants of the State of Paraná is under review. However, there is the Compliance Agent Code of Ethics, which presents the responsibilities of Agents towards society, the body or entity in which they work and the profession, which must be used as a guide for their actions. In the Compliance Agent Code of Ethics, chapters I, II and III deal with principles, duties and conduct. Furthermore, the Statute of Servants of the State Executive Branch, State Law No. 6,174/1970, defines the duties (art. 279), prohibitions (art. 285) and penalties (chapter VI).

In addition, the Integrity and Compliance Program has as one of its phases the preparation of the Code of Ethics and Conduct, in accordance with State Law No. 19,857/2019, Decree No. 2,902/2019 and CGE Normative Instruction No. 04/2023.

AC5. Please report the company's total number and nature of incidents of corruption during the reporting year.

Linked to: GRI Disclosure 205-3 (2016); WEF Common Metrics; ISAR D.2.1(Matrix – Text Boxes with option for Unknown or N/A)

	Number of incident(s) (Please describe the nature of the incidents in the text box below)	Unknown	Choose to not disclose
Confirmed during the current year, but related to previous years	<div></div>	<input type="radio"/>	<input type="radio"/>

Confirmed during the current year, and related to this year

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Please provide additional explanation: _____

