

CGU publishes a Practical Guide for Calculation of Fines Established in the Anticorruption Law

<p>Continuity of the harmful act over time</p>	<p>Criteria for increase of the fine that ranges from 0% to 2.5% of the entity’s gross revenue. Applicable in case the practice of harmful acts is continuous.</p> <p>0% - No continuity of the harmful acts over time 1.0% - Up to one year of continuous practice of harmful acts 1.5% - More than one year of continuous practice of harmful acts 2.0% - More than two years of continuous practice of harmful acts 2.5% - More than three years of continuous practice of harmful acts</p>
<p>Knowledge by management of the entity</p>	<p>Criteria for increase of the fine that ranges from 0% to 2.5% of the entity’s gross revenue, which is applicable in case at least one member of the board of directors of the entity was aware of the harmful act or tolerated its practice.</p> <p>0% - No knowledge of the harmful act by the officers and middle management of the entity 1.0% - No knowledge of the harmful act by the officers, but knowledge by, at least, one of the members of middle management 1.5% - Knowledge of the harmful act by at least one of the officers or, if applicable, one of the members of the board of directors 2.0% - Involvement of at least one of the entity’s middle management in the harmful act 2.5% - Involvement of at least one of the officers or, if applicable, one of the members of the board of directors in the harmful act</p>
<p>Interruption of public services or performance of a contracted project</p>	<p>Criteria for increase of the fine that ranges from 0% to 4% of the entity’s gross revenue, which is applicable in case there is causation between the harmful act and the (i) interruption of the provision of a public service or (ii) suspension of the contract for the project.</p> <p>0% - No interruption of the provision of a public service or in the execution of a contracted project</p>



1.0% - Interruption of the provision of a public service or performance of a contracted project that is not detrimental to the service or project

2.0% - Interruption of the provision of public service or the execution of a project that is detrimental to a non-essential public service or to the execution of a project

4.0% - Interruption of the provision of a public service or a contracted project that is detrimental to an essential public service or causes financial damage to a contracted project



Level of cooperation of the legal entity with the investigation

Criteria for reduction of the fine that ranges from 0% to -1.5% of the entity's gross revenue, which is applicable in case the entity cooperated with the investigations or inquiry of the harmful act, irrespective of execution of a leniency agreement.

0% - No cooperation by the legal entity

-1.0% - Legal entity cooperated with the investigations by delivering part of the information (including financial information about its gross revenue, for example) and/or documents requested by CPAR, but not all

-1.5% - Entity cooperated with the investigations by delivering all the information and/or documents requested by CPAR