



**IACC HIGH-LEVEL SEGMENT  
MONITORING MECHANISM  
ARGENTINA  
2018-2022**

**Poder Ciudadano** works for good government, transparency and the strengthening of democracy. Its mission is to promote citizen participation, accountability and access to public information to strengthen the institutions of democracy through collective action.

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# EXECUTIVE SUMMARY

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## SUMMARY OF FINDINGS

Total number of commitments made at the 18 <sup>th</sup> IACC	3
Total number of commitments selected for monitoring	2
<b>Current level of progress in commitment implementation</b>	
Number of fulfilled commitments	0
Number of partially fulfilled commitments	2
Number of commitments not fulfilled/dropped	0

## KEY CHALLENGES TO COMMITMENT IMPLEMENTATION

- 1. Lack of transparency in the management of apparent conflicts of interest in state contracts:** The rules and procedure manuals for citizen participation tools for the management of apparent conflicts of interest in state contracts are not publicly available. There is also a lack of transparency in the procedures carried out after declarations of interests have been received. This leads to a lack of the traceability needed for civil society, journalists and citizens to monitor the proposed mechanisms and hold the government accountable.
- 2. Lack of citizen participation in the management of apparent conflicts of interest in state contracts, despite the availability of appropriate mechanisms:** Even though citizen participation is formally proposed as an approach for the management of apparent conflicts of interest in state contracts, it is rarely used in practice. In addition, one of the mechanisms that provides for such participation, integrity pacts, often translates into the mere signing of a "declaration of integrity" and is seen as a box-checking exercise, with no real impact.
- 3. Lack of transparency in public infrastructure contracts:** Information on the inclusion of integrity clauses in public infrastructure contracts is not publicly available. This leads to a lack of the transparency needed for citizens and civil society to hold the government accountable for this commitment.
- 4. Lack of transparency in the "Plan for Promotion of Integrity Programmes for Legal Entities":** The plan is not available on the Anti-Corruption Office website, nor was it provided for this report when asked via a public information request. The Anti-Corruption Office only provided a list of past activities, instead of a strategic plan that can be used to monitor systematically what has been implemented and what has not.
- 5. Voluntary nature and lack of verification mechanism of the new Registry of Integrity and Transparency for Companies and Entities (RITE):** The voluntary nature of RITE leads to the registry being incomplete, and there are no obligations for companies to commit to their integrity programmes. There are also no mechanisms to verify that the information provided by companies is legitimate.

## KEY OPPORTUNITIES TO ACCELERATE COMMITMENT IMPLEMENTATION

1. **Reform of the Integrity and Public Ethics Bill**, which proposes to update the integrity system in the national public administration in terms of digital transformation. The Bill was written through a public-participation mechanism in which citizens contributed to the reform with opinions, comments and suggestions. It has been sent by the Anti-Corruption Office to the Presidency of the Nation, but has not yet been sent to Congress for consideration. This public ethics reform bill offers an opportunity to make declarations of interest available to the public using open data standards.
2. **Partnership with the Mexican Chapter of the World Compliance Association (WCA)**: The Anti-Corruption Office is working with the Mexican Chapter of the WCA on integrity platforms promoted in both countries: the Registry of Integrity and Transparency for Companies and Entities of Argentina (RITE) and the Register of Business Integrity of Mexico.<sup>1</sup> This joint work can help Argentina learn more about best practices.
3. **Open Government Partnership (OGP) National Action Plan**: Argentina is currently working on the fifth OGP National Action Plan. Topics that the commitments will address include participation and citizen control in public works,<sup>2</sup> which offers an opportunity to deepen and strengthen citizen participation. The plan will be implemented at the national level between October 2022 and December 2024.
4. **Organisation for Economic Co-operation and Development (OECD)**: Argentina could benefit from the experience of the OECD as a standard-setter for global anti-corruption and integrity. The organisation could also help Argentina address the challenges of fighting corruption and promoting international cooperation.

## KEY RECOMMENDATIONS

### Improve the implementation of existing commitments.

1. Reintroduce public-private partnership contracting.
2. Make registration in the Registry of Integrity and Transparency for Companies and Entities (RITE) mandatory for companies and include a verification mechanism for the information they provide.
3. Improve the visibility of declarations of interest published on the Anti-Corruption Office website.
4. Publish the rules and procedure manuals for the management of apparent conflicts of interest in state contracting. In addition, publish steps in the procedures carried out after the submission of a declaration of interests, to ensure transparency over which mechanism was chosen and why.
5. Train public officials and private-sector actors contracting with the state in how to complete the "Sworn Declaration of Interests".

### Make new commitments to close existing anti-corruption gaps. Within the framework of a new Public Ethics Bill, the Anti-Corruption Agency should:

6. Increase citizen participation in the management of conflicts of interest.
7. Create a whistleblower protection programme.
8. Develop a public integrity policy with a clear definition of "integrity".
9. Make declarations of interest available to the public via the Anti-Corruption Office website using open data standards.
10. Develop a sanctions regime for breaches of public ethics regulations.

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<sup>1</sup> Argentina Republic, Mexico and Argentina presented their platforms for the development of integrity in companies, <https://www.argentina.gob.ar/noticias/mexico-y-argentina-presentaron-sus-plataformas-para-el-desarrollo-de-integridad-en-empresas>

<sup>2</sup> <https://www.argentina.gob.ar/jefatura/innovacion-publica/servicios-y-pais-digital/gobierno-abierto/quinto-plan-de-accion-talleres>

# INTRODUCTION

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The 18th International Anti-Corruption Conference (IACC) in Copenhagen featured a series of high-level meetings among countries in the Organisation for Economic Co-operation and Development (OECD), non-OECD countries, and international and regional organisations. As part of these meetings, participants made a set of statements on the steps that each intends to take to make progress in the field of anti-corruption, based on existing commitments, such as Open Government Partnership (OGP) action plans, the UK Summit, the United Nations Convention against Corruption (UNCAC), OECD instruments and the Sustainable Development Goals.<sup>3</sup> Participants at the high-level meetings agreed to establish a follow-up mechanism engaging all stakeholders (including governments, international and regional organisations, companies and civil society) in monitoring the implementation of these commitments.

The aims of the follow-up mechanism are to:

- assess the level of progress towards implementation of the commitments
- provide further analysis on, and complement, other reporting mechanisms
- focus on the qualitative nature of the commitments, rather than quantitative scoring or ranking
- provide insights into what has and has not worked, and why
- provide insights into the opportunities and challenges for implementation, as a basis for understanding where technical support should be targeted.

The follow-up mechanism aims to capture the context and conditions under which the commitments are being implemented, as well as recording progress in their implementation. It provides further analysis on, and complements, other reporting mechanisms, rather than duplicating them.

This report presents the results of the first round of monitoring for Argentina. It contains the following sections:

1. Filtering of commitments: the results of our selecting Argentina's commitments for monitoring, based on an assessment of their level of specificity and measurability.
2. Analysis of Argentina's context: a brief analysis of the extent to which the commitments overall are considered pertinent to the country context.
3. Progress in implementing the commitments: the level of progress toward the commitments selected for monitoring, and challenges and opportunities for implementation.
4. Recommendations: key recommendations to accelerate commitment implementation.

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<sup>3</sup>Transparency International, 18th IACC high-level segment commitments, <https://iaccseries.org/18th-iacc/18th-iacc-high-level-segment-commitments/>

# FILTERING OF COMMITMENTS

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In total, Argentina presented three commitments at the 18<sup>th</sup> IACC in 2018. Of these, we consider all three feasible to monitor, based on their level of specificity and measurability, as presented below.

## **COMMITMENT 1: Implement the High-Level Reporting Mechanism in the bidding process for the Safe Highway and Roads Network Project.**

IS THE COMMITMENT SPECIFIC?

NO

Even though this commitment identifies a sufficiently narrow anti-corruption mechanism, it is not considered specific, because the bidding process ended in June 2018, before the commitment was made at the IACC in October 2018.<sup>4</sup> The Safe Highway and Roads Network Project was a public-private partnership infrastructure project that included the construction of roads and railways, and the paving of six road corridors in five provinces.<sup>5</sup> The High-Level Reporting Mechanism is a specific protocol for reporting or filing alerts over ethical irregularities during the bidding for public-private partnership contracts.<sup>6</sup> Such irregularities include bribery or attempted bribery, conflicts of interest, or influence peddling.<sup>7</sup>

IS THE COMMITMENT MEASURABLE?

NO

Even though the commitment identifies several measurable actions in relation to the High-Level Reporting Mechanism during the bidding process for the Safe Highway and Roads Network Project, these actions had already been implemented before the commitment was made, and are therefore not measurable.

IS THE COMMITMENT SELECTED FOR MONITORING

NO

## **COMMITMENT 2: Implement integrity guidelines for better compliance with articles 22 and 23 of Law 27 401 on Criminal Liability of Legal Persons.**

IS THE COMMITMENT SPECIFIC?

YES

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<sup>4</sup> See Annex 2.

<sup>5</sup> Anti-Corruption Office, Anti-Corruption Office Management Report 2015-2019, p.57, [https://www.argentina.gob.ar/sites/default/files/informe\\_de\\_gestion\\_oa\\_2015-2019\\_1.pdf](https://www.argentina.gob.ar/sites/default/files/informe_de_gestion_oa_2015-2019_1.pdf)

<sup>6</sup> Boletín Oficial de la República Argentina, Law N° 27.328, <https://www.boletinoficial.gob.ar/detalleAviso/primera/154833/20161130?busqueda=1>; Boletín Oficial de la República Argentina, Executive Order N° 118/2017, Annex I, Art. 24, <https://www.boletinoficial.gob.ar/detalleAviso/primera/159233/20170220>

<sup>7</sup> Anti-Corruption Office, Anti-Corruption Office Management Report, [https://www.argentina.gob.ar/sites/default/files/informe\\_de\\_gestion\\_oa\\_2015-2019\\_1.pdf](https://www.argentina.gob.ar/sites/default/files/informe_de_gestion_oa_2015-2019_1.pdf)

The commitment can be considered specific because it refers to implementing a concrete policy instrument: the integrity guidelines defined by the Law on Criminal Liability of Legal Persons.<sup>8</sup> These guidelines are procedures to prevent, detect and correct irregularities and illegal acts. The Anti-Corruption Office further specified these guidelines in Resolution 27/2018, which was adopted in the same month as the 18<sup>th</sup> IACC, October 2018.<sup>9</sup> They therefore existed before the commitment was made. However, within the framework of the national anti-corruption plan,<sup>10</sup> there are three more specific commitments related to implementing the integrity guidelines:<sup>11</sup>

- 2.1 Commitment 4 (execution period: 2019) requires all suppliers interested in contracting with the national administration to sign specific integrity commitments. However, it is not specified what an integrity commitment entails.
- 2.2 Commitment 116 (execution period: 2020-2023) includes implementing a promotion and dissemination plan for the regulatory framework for integrity in public-private partnership contracts. It also aims at promoting training and dissemination activities in specific sectors at national, provincial and municipal levels.
- 2.3 Commitment 117 (execution period: 2020) includes a process to map companies that declare, within public procurement processes, that they have integrity standards.

<b>IS THE COMMITMENT MEASURABLE?</b>	<b>YES</b>
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This commitment is measurable because it identifies the implementation of integrity guidelines as a clear action. How this will be achieved is further defined in the national anti-corruption plan:

1. Include integrity clauses in public contracting (the content of these clauses is not specified)
2. Implement the "Plan for the Promotion of Integrity Programmes for Legal Entities"
3. Develop a mapping process for companies that declare they have integrity standards, for use in purchasing, contracting and public works processes.

<b>IS THE COMMITMENT SELECTED FOR MONITORING</b>	<b>YES</b>
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**COMMITMENT 3: Implementation of transparency and citizen participation tools under Executive Order 202/2017 for the Management of Apparent Conflicts of Interest in State Contracts (Executive Order 202/2017).**

<b>IS THE COMMITMENT SPECIFIC?</b>	<b>YES</b>
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The commitment focuses on introducing an obligation by the Anti-Corruption Office to establish a specific procedure for managing situations that could constitute an apparent conflict of interest.

<sup>8</sup> Boletín Oficial de la República Argentina, Law N° 27.401, <https://www.boletinoficial.gob.ar/detalleAviso/primera/175501/20171201?busqueda=1>

<sup>9</sup> Boletín Oficial de la República Argentina, Resolution 27/2018, <https://www.boletinoficial.gob.ar/detalleAviso/primera/193241/20181004?busqueda=1>

<sup>10</sup> Boletín Oficial de la República Argentina, Executive Order 258/2019, Annex 1, <https://www.boletinoficial.gob.ar/detalleAviso/primera/205233/20190411?busqueda=1>

<sup>11</sup> Anti-Corruption Office, Guidelines for the implementation of integrity programmes, <https://www.argentina.gob.ar/anticorruptcion/prevencion/transparencia/lineamientos>

This procedure requires anyone who wants to contract with the state to submit a "Sworn Declaration of Interests", including declaring any link with members of the government's highest authorities. Failure to do so will incur strict sanctions, including being barred from contracting with the state. Links with an official which potential contractors must declare include:<sup>12</sup>

- a blood relationship to the fourth degree and in-law-relationship to the second degree
- a company or association
- pending legal action
- being a debtor or creditor
- having received significant benefits
- having a public friendship evidenced by greater familiarity or frequent interaction.

If the declaration of interests suggests the existence of any of these links, the following process must be applied:

a) Submit the "Sworn Declaration of Interests" to the Anti-Corruption Office and the Office of the Auditor-General within three days of receipt.

b) The Anti-Corruption Office must publish every step of the procedures on its website.

(c) The state agency wishing to enter a contract should adopt, in a well-founded manner and involving the Anti-Corruption Office and the General Syndicate of the Nation (SIGEN), at least one of the following mechanisms:<sup>13</sup>

I. Signing of integrity pacts: An agreement in which the parties commit to acting with transparency, ethics and integrity, subject to the responsibilities established in each case. The parties involved must refrain from giving or offering money or any gift to influence public officials or employees. The signed pact may establish as a sanction exclusion from the bidding procedure or the corresponding process in case of non-compliance.

II. Participation of social witnesses: Any person or group of people belonging to civil society, the scientific or academic community, or professional associations, designated by organisations or entities to exercise control over the development and execution of public contracting procedures. The witnesses must verify whether the process is carried out in accordance with legal criteria and international standards of transparency and integrity.

III. Special oversight by control agencies: One or more national public-sector control bodies (for example, the Anti-Corruption Office and the Attorney General's Office of Administrative Investigations) carries out a control procedure over an apparent conflict of interest. In response to a public information request about what kind of control procedures are carried out, the Anti-Corruption Office clarified that the respective control agency should make recommendations to actively encourage more transparency in public contracting.

IV. Public hearings: These seek to allow and promote effective citizen participation, addressing in a transparent and public manner the opinions, proposals, experiences, knowledge and existing information on the issues raised for consultation. Any person who invokes a right or interest related to the issue to be discussed may participate in a public hearing. Neither Executive Order N° 202/2017 nor a request by Poder Ciudadano for public information specifies how or where the public hearings should take place. In an interview for

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<sup>12</sup> Boletín Oficial de la República Argentina, Executive Order N° 202/2017, <https://www.boletinoficial.gob.ar/detalleAviso/primera/160466/20170322?busqueda=1>. These mechanisms were specified in more detail in response to a request by Poder Ciudadano for access to public information.

<sup>13</sup> Annex 3.

this report, the Director of Transparency Policy Planning at the Anti-Corruption Office, revealed that this mechanism has never been implemented.

**IS THE COMMITMENT  
MEASURABLE?**

**YES**

The commitment can be measured by monitoring whether the procedure and any of the control mechanisms were applied after a "Sworn Declaration of Interests" was submitted.

**IS THE COMMITMENT SELECTED  
FOR MONITORING**

**YES**

# COUNTRY CONTEXT

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The issue of corruption in Argentina is significant. The country has a long history of deficiencies in the anti-corruption framework that lead to corrupt behaviour not being investigated and punished. The situation was exacerbated during the Covid-19 pandemic, which created new opportunities for corruption to flourish as the National Public Administration (*Administración Pública Nacional*, APN) implemented an opaque system of emergency funds,<sup>14</sup> with only minimal accountability mechanisms – for example, contracts for the acquisition of vaccines, which were not publicly accessible and contained confidentiality clauses.<sup>15</sup> This situation was reflected in the country's latest score on Transparency International's *Corruption Perceptions Index* (CPI) 2021.<sup>16</sup> Argentina ranked 96 out of 180 countries, with its score falling by four points compared to the previous year, to 39 out of 100 – below the global average of 43. The lack of transparency in public procurement and contracting,<sup>17</sup> the discretionary vaccination scheme (VIP vaccination),<sup>18</sup> and government officials' unethical behaviour could explain this drop. For example, the president Alberto Fernandez held an illegal birthday party on July 2020 for his partner at the presidential residence when the country was under strict lockdown.<sup>19</sup>

According to Transparency International's *Global Corruption Barometer* (GCB) 2019,<sup>20</sup> 56 per cent of people in Argentina think that most or all government officials are involved in corruption. Almost half – 49 per cent – of people thought corruption had increased in the previous 12 months and 67 per cent believed Argentina's government was doing poorly in tackling corruption.<sup>21</sup>

In terms of freedom of expression, association and assembly, the Office of the Special Rapporteur for Freedom of Expression of the Inter-American Commission on Human Rights raised concerns about unusual surveillance activities, or “cyber patrolling”, on social media by national security forces. This online surveillance reportedly resulted in arrests and the opening of federal cases for the crime of public intimidation against people posting content about Covid-19 that differed from official information.<sup>22</sup> The “Freedom in the World 2022” index, which analyses political rights and civil liberties, rated the country with 84 points out of 100.<sup>23</sup> According to its publisher, Freedom House, “Argentina is a vibrant representative democracy with competitive elections, lively media and civil society sectors,

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<sup>14</sup> Poder Ciudadano, Public Purchasing and Contracting Observatory in the Framework of COVID-19,

[https://poderciudadano.org/wp-content/uploads/2020/06/Informe\\_Observatorio-de-ComprasCOVID19.pdf](https://poderciudadano.org/wp-content/uploads/2020/06/Informe_Observatorio-de-ComprasCOVID19.pdf)

<sup>15</sup> Poder Ciudadano, Regulatory risk analysis of the law on vaccines intended to generate acquired immunity against COVID-19 (Law No. 27,573/20), <https://vacunas.poderciudadano.org/wp-content/uploads/2022/03/COVID-19-Vacunas-Analisis-de-Riesgos-Normativos.pdf>

<sup>16</sup> Transparency International, *Corruption Perceptions Index* 2021, Argentina,

<https://www.transparency.org/en/cpi/2021/index/arg>

<sup>17</sup> Poder Ciudadano, Public Purchasing and Contracting Observatory in the Framework of COVID-19,

[https://poderciudadano.org/wp-content/uploads/2020/06/Informe\\_Observatorio-de-ComprasCOVID19.pdf](https://poderciudadano.org/wp-content/uploads/2020/06/Informe_Observatorio-de-ComprasCOVID19.pdf)

<sup>18</sup> *Buenos Aires Times*, Argentina's government struggles to contain ‘VIP vaccine’ scandal,

<https://www.batimes.com.ar/news/argentina/government-struggles-to-contain-vip-vaccine-scandal.phtml>

<sup>19</sup> *Buenos Aires Times*, President Fernández under fire for Olivos birthday party during lockdown,

<https://www.batimes.com.ar/news/argentina/president-fernandez-under-fire-for-olivos-birthday-party-during-lockdown.phtml>

<sup>20</sup> Transparency International, *Corruption Global Barometer* 2019, Argentina,

<https://www.transparency.org/en/qcb/latin-america/latin-america-and-the-caribbean-x-edition-2019/results/arg>

<sup>21</sup> Transparency International, *Global Corruption Barometer* 2019, Argentina,

<https://www.transparency.org/en/qcb/latin-america/latin-america-and-the-caribbean-x-edition-2019/results/arg>

<sup>22</sup> Inter-American Commission on Human Rights, Annual Report of the Inter-American Commission on Human Rights

2020, [https://www.buenosaires.gob.ar/sites/gcaba/files/informe\\_anual\\_cidh\\_2020.pdf](https://www.buenosaires.gob.ar/sites/gcaba/files/informe_anual_cidh_2020.pdf)

<sup>23</sup> Freedom House, Argentina, <https://freedomhouse.org/country/argentina/freedom-world/2022>

and unfettered public debate. Economic instability, corruption in the government and judiciary are among the country's most serious challenges."<sup>24</sup>

Despite numerous incidents of grand corruption, Argentina's justice system performs poorly in investigating and punishing corruption. Among the main reasons is the lack of judicial independence from the executive and legislative branches of state. This results in overlapping responsibilities and uncoordinated efforts to tackle corruption, which are frequently reported by the media.<sup>25</sup>

A group of civil society organisations that includes Poder Ciudadano<sup>26</sup> argues that one of the most worrying problems in Argentina's anti-corruption system is the inefficient and slow functioning of the judiciary in its role as investigator and punisher of corruption.<sup>27</sup> In addition, the current integrity system lacks proper mechanisms for protecting whistleblowers, witnesses and informants of corruption, enabling impunity.<sup>28</sup>

Over the years, there have been various government commitments to strengthen the legal framework, policies and institutions. Since 1999, Argentina has had an Anti-Corruption Office to strengthen ethics and integrity in the national public administration, state-owned companies and any other public or private entity in which the state participates or which receives state contributions as its main source of funding. However, because this agency is within the orbit of the executive, its authority and the planning of its activities are subject to political fluctuations.<sup>29</sup>

For example, during 2018-2019, the Anti-Corruption Office prepared a National Anti-Corruption Plan for 2019-2023, approved through Decree 258/2019.<sup>30</sup> However, during 2020, a change of management meant a review of the plan, which resulted in a National Integrity Strategy.<sup>31</sup> Although both the plan and the strategy aimed to address gaps in Argentina's anti-corruption framework, structural reform of the regulations is needed – in particular, a new Public Ethics Law and an update of the regulations for funding civic infrastructure<sup>32</sup> and the Public Procurement Decree.<sup>33</sup>

Argentina has been part of the Open Government Partnership since 2012,<sup>34</sup> and has developed four action plans, co-created with civil society. Since 2016, the country has also implemented numerous reforms that promote more transparency, control and accountability to prevent corruption, through the Law on Criminal Liability of Legal Entities<sup>35</sup> and the Law on Access to Public Information.<sup>36</sup> The former defines the criminal liability of legal persons for corruption crimes, including transnational and

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<sup>24</sup> Freedom House, Argentina, <https://freedomhouse.org/country/argentina/freedom-world/2022>

<sup>25</sup> Insight Crime, Corruption cases persist in Argentina's federal justice system, <https://es.insightcrime.org/noticias/persisten-casos-corrupcion-justicia-federal-argentina/>

<sup>26</sup> Poder Ciudadano, Directorio Legislativo, ACIJ, AFDA, Cultura Democrática, Fundación Nuestra Mendoza, Fundeps, Ruido and Techo.

<sup>27</sup> OCC, Argentina Report – Follow-up on the Lima Agreement. Citizen Corruption Observatory, [https://occ-america.com/wp-content/uploads/2021/09/Informe-Argentina\\_ENG.pdf](https://occ-america.com/wp-content/uploads/2021/09/Informe-Argentina_ENG.pdf) (Page 21)

<sup>28</sup> OCC, Argentina Report – Follow-up on the Lima Agreement. Citizen Corruption Observatory, [https://occ-america.com/wp-content/uploads/2021/09/Informe-Argentina\\_ENG.pdf](https://occ-america.com/wp-content/uploads/2021/09/Informe-Argentina_ENG.pdf)

<sup>29</sup> Anti-Corruption Office Argentina, Decree 102/99, <http://servicios.infoleg.gob.ar/infolegInternet/anexos/60000-64999/61724/norma.htm>

<sup>30</sup> Decree 258/2019. <https://www.argentina.gob.ar/normativa/nacional/decreto-258-2019-322013/texto>

<sup>31</sup> Anti-Corruption Office Argentina, Working document on the design of the National Integrity Strategy, [https://www.argentina.gob.ar/sites/default/files/documento\\_de\\_trabajo\\_sobre\\_el\\_diseno\\_de\\_la\\_estrategia\\_nacional\\_de\\_integridad.pdf](https://www.argentina.gob.ar/sites/default/files/documento_de_trabajo_sobre_el_diseno_de_la_estrategia_nacional_de_integridad.pdf)

<sup>32</sup> Ministry of Justice Argentina, Law N° 13.064, <http://servicios.infoleg.gob.ar/infolegInternet/anexos/35000-39999/38542/norma.htm>

<sup>33</sup> Ministry of Justice Argentina, Decree N° 1023/2001, <http://servicios.infoleg.gob.ar/infolegInternet/anexos/65000-69999/68396/texact.htm>

<sup>34</sup> Argentina has been part of the OGP since 2012. <https://www.argentina.gob.ar/jefatura/innovacion-publica/servicios-y-pais-digital/gobierno-abierto/argentina-en-ogp>

<sup>35</sup> Boletín Oficial de la República Argentina, Law N° 27.401, <https://www.boletinoficial.gob.ar/detalleAviso/primera/175501/20171201?busqueda=1>

<sup>36</sup> Boletín Oficial de la República Argentina, Law N° 27.275, <https://www.boletinoficial.gob.ar/detalleAviso/primera/151503/20160929?busqueda=1>

domestic bribery, influence peddling, negotiations incompatible with the fulfilment of public functions, extortion, embezzlement, and false or aggravated balance sheets and reports.<sup>37</sup> The Law on Access to Public Information guarantees citizens' right to access public information and promotes citizen participation and transparency in public management.<sup>38</sup>

With its IACC commitments, Argentina aims to apply new approaches to better manage risks in public contracting. Although the government made only three commitments at the conference, these address notable weak spots, such as bribery, lack of transparency and conflict of interests.

The commitment on the "High-Level Reporting Mechanism in the bidding process of the Safe Highway and Roads Network Project" was not ambitious, as Argentina already had reporting channels such as the Anti-Corruption Office report form<sup>39</sup> or the Office of Administrative Investigations form.<sup>40</sup> Opening new reporting channels without incentives to report and safeguards such as whistleblower protection or an independent judiciary will be ineffective in tackling corruption.

Guidelines published by the Anti-Corruption Office were the first official document to address the commitment to "implement integrity guidelines for better compliance with articles 22 and 23 of Law 27.401 on the Criminal Liability of Legal Persons". The proposal for a Registry of Integrity and Transparency for Companies and Entities (RITE) aims to provide a registry of all companies and entities with an integrity programme, accompanied by a toolbox including training materials. However, being voluntary, the registry is not complete and there are no obligations for companies to commit to their integrity programmes.<sup>41</sup> There are also no mechanisms to verify that the information provided by companies is legitimate.

In relation to the commitment on "tools of transparency and citizen participation under Executive Order 202/2017", the executive order obliges the entity developing the bidding process to apply one of the mechanisms outlined in the order. According to the Director of Transparency Policy Planning, state contracting parties often choose a mechanism without citizen participation, such as public hearings or social witnesses, in an attempt to avoid delaying the bidding process.<sup>42</sup> The executive order does not differentiate between the existing alternatives, even when they involve citizen participation to a lesser extent.

Overall, Argentina's 2018 IACC commitments cover very niche topics with little impact on improving the overall anti-corruption framework of the country. However, the Anti-Corruption Office is working on a new Public Ethics Bill which proposes more ambitious goals to tackle corruption. This incorporates numerous changes and was written through the collective participation process established in the General Regulations for the Participative Elaboration of Norms, approved by Article 3° of Decree No. 1172/03 (Annex V).<sup>43</sup> Poder Ciudadano proposed modifications regarding whistleblower protection, the sworn declarations system and conflict of interest, and provided a definition of "integrity". These included that the government create a protection programme for whistleblowers, witnesses and victims of crimes against the public administration, which would provide physical protection and advice on the judicial process. They also included changing the

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<sup>37</sup> Boletín Oficial de la República Argentina, Law N° 27.401,

<https://www.boletinoficial.gob.ar/detalleAviso/primera/175501/20171201?busqueda=1>

<sup>38</sup> Boletín Oficial de la República Argentina, Law N° 27.275,

<https://www.boletinoficial.gob.ar/detalleAviso/primera/151503/20160929?busqueda=1>

<sup>39</sup> Ministry of Justice Argentina, Complaint form of the Anti-Corruption Office, <http://denuncias.anticorruptcion.gob.ar/>

<sup>40</sup> Public Prosecutor's Office, Complaints, <https://www.mpf.gob.ar/pia/denuncias/>

<sup>41</sup> Anti-Corruption Office Argentina, Registry of Integrity and Transparency for Companies and Entities,

[https://www.argentina.gob.ar/sites/default/files/rite\\_consideraciones\\_generales\\_junio2021.pdf](https://www.argentina.gob.ar/sites/default/files/rite_consideraciones_generales_junio2021.pdf)

<sup>42</sup> See Annex 4. Meeting Minutes: Interview with the Director of Transparency Policy Planning of the Anti-Corruption Office

<sup>43</sup> Anti-Corruption Office Argentina, Participatory preparation of the Public Integrity and Ethics Law project,

<https://www.argentina.gob.ar/noticias/elaboracion-participativa-del-proyecto-de-ley-de-integridad-y-etica-publica>

proposed definitions of conflict of interest, which mentions the "public interest" instead of the "public duty" recommended by the OECD,<sup>44</sup> and of integrity, which should be based on four pillars:

- ethical exercise of public functions
- transparency and maximum disclosure of acts of the public administration
- participation and social control of public management
- accountability.

In addition, these actions, mechanisms and procedures must be designed taking into account the entire "anti-corruption value chain": prevention, detection, investigation, sanction, recovery and repair of the damage caused.<sup>45</sup>

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<sup>44</sup> OECD, Managing Conflict of Interest in the Public Service, [https://www.oecd-ilibrary.org/governance/managing-conflict-of-interest-in-the-public-service\\_9789264104938-en](https://www.oecd-ilibrary.org/governance/managing-conflict-of-interest-in-the-public-service_9789264104938-en)

<sup>45</sup> See Annex 5.

# PROGRESS ON COMMITMENT IMPLEMENTATION

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**COMMITMENT 2: Implement integrity guidelines for better compliance with sections 22 and 23 of Law 27 401 on Criminal Liability of Legal Persons.**

**THEMATIC AREA:** 4. Business Integrity

**COMMITMENT TIMEFRAME:** October 2018-March 2020

**COMMITMENT SOURCE:** Anti-Corruption Strategy<sup>46</sup> and the UK Anti-Corruption Summit<sup>47</sup>

## Current level of progress in commitment implementation

Fulfilled

Partially fulfilled

X

Not fulfilled/dropped

When this commitment was made, the Anti-Corruption Office had already specified the integrity guidelines in Resolution 27/2018. This means the commitment is a description of an existing anti-corruption framework. However, within the framework of the National Anti-Corruption Plan (Executive Order 258/2019), the Anti-Corruption Office added three more specific commitments<sup>48</sup> related to implementing the integrity guidelines:

### *1. The inclusion of integrity clauses in public infrastructure contracts*

In the Public, National and International Tender for the Waterway Main Navigable Way, the bidding terms included a chapter on Integrity and Transparency, and incorporated conditions of integrity and transparency clauses.<sup>49</sup>

However, there is no public evidence that integrity clauses were included in other public infrastructure contracts. When we requested this information from the Anti-Corruption Office for this report, they responded to the request without providing information on the contracts in which integrity clauses were implemented.<sup>50</sup>

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<sup>46</sup> Boletín Oficial de la República Argentina, National Anti-Corruption Plan (2019-2023), <https://www.boletinoficial.gob.ar/detalleAviso/primera/205233/20190411>

<sup>47</sup> UK Anti-Corruption Summit, Argentina's Commitments, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/522967/Argentina.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522967/Argentina.pdf)

<sup>48</sup> Anti-Corruption Office Argentina, Guidelines for the implementation of integrity programmes, <https://www.argentina.gob.ar/anticorrupcion/prevencion/transparencia/lineamientos>

<sup>49</sup> Ministry of Transport, "Integrity and Transparency Clauses to be Included in the Waterway Tender Specifications", <https://www.argentina.gob.ar/transporte/via-navegable-troncal/clusulas-de-integridad-y-transparencia-para-incorporar-al-pliego-de-licitacion-de-la-hidrovia>

<sup>50</sup> See Annex 6.

## 2. Implementation of a "Plan for Promotion of Integrity Programmes for Legal Entities "

The Plan for Promotion of Integrity Programmes for Legal Entities includes training and dissemination activities in specific sectors, such as small and medium-sized enterprises, at national, provincial and municipal levels. There is no public information about this plan, and when asked in a public information request for this report,<sup>51</sup> the Anti-Corruption Office provided only a list of past activities, instead of a strategic plan that can be used to monitor systematically what has been implemented and what has not. In 2021, the office organised two courses under the framework for "Integrity and Public Ethics Guidelines: essential aspects of corporate responsibility for corruption (Law No. 27,401)". This activity aimed to develop the essential aspects of the corporate responsibility regime, conceptualise an integrity programme and explore the main legal effects of its adoption by companies. The Anti-Corruption Office has also carried out meetings and roundtables with the private sector in order to create a space for permanent dialogue over collective action, and form a community to debate and produce transparency policies. In terms of the dissemination and external communication of RITE (see below), the Anti-Corruption Office held workshops with the Argentine Union of State Suppliers (*Unión Argentina de Proveedores del Estado*) and the German and British Chambers of Commerce.<sup>52</sup>

## 3. Mapping companies that declare they have integrity programmes

The Anti-Corruption Office launched the first voluntary integrity and transparency registry for companies and entities in Argentina in May 2022, RITE.<sup>53</sup> The registry aims to contribute to the development, improvement and maturity of organisational integrity programmes,<sup>54</sup> exchange good practices, and promote transparent environments in businesses and markets. RITE's approach is twofold: the registry itself, which allows companies and entities to make their commitment to ethical business visible, and the toolbox, to support the development of integrity programmes and help public entities improve their understanding of the integrity programmes of companies they contract.<sup>55</sup>

**Overall, this commitment is considered only partially fulfilled.**

### Challenges to effective commitment implementation

1. **Lack of transparency in public infrastructure contracts:** Information on the inclusion of integrity clauses in public infrastructure contracts is not publicly available. This leads to lack of the transparency needed for citizens and civil society to hold the government accountable for this commitment.
2. **Lack of transparency of the Plan for Promotion of Integrity Programmes for Legal Entities:** The plan is not available on the Anti-Corruption Office website, nor did the office provide it when asked in a public information request for this report. The Anti-Corruption Office only provided a list of past activities, instead of a strategic plan that can be used to monitor systematically what has been implemented and what has not.
3. **Voluntary nature and lack of verification mechanism of the new Registry of Integrity and Transparency for Companies and Entities (RITE):** The voluntary nature of RITE leads to the registry being incomplete, and there are no obligations for companies to commit to their integrity programmes. There are also no mechanisms to verify that the information provided by companies is legitimate.

<sup>51</sup> See Annex 7.

<sup>52</sup> See Annex 8.

<sup>53</sup> Anti-Corruption Office Argentina, RITE, <https://www.rite.gob.ar>

<sup>54</sup> Integrity programmes being defined by Law N° 27.401 are the set of actions and mechanisms to promote integrity, supervision and control, aimed at preventing, detecting and correcting irregularities and illicit acts covered by this law.

<sup>55</sup> Anti-Corruption Office Argentina, RITE, <https://www.rite.gob.ar>

## Opportunities to accelerate commitment implementation

The Anti-Corruption Office is working with the Mexican Chapter of the World Compliance Association on integrity platforms promoted in both countries: RITE in Argentina and the Register of Business Integrity of Mexico.<sup>56</sup> Argentina can benefit from this joined work through learning more about best practices.

## Recommendations

- Promote the "Guidelines for the implementation of integrity programmes"<sup>57</sup> created by the Anti-Corruption Office by making them more accessible. The guidelines provide technical guidance for the design, implementation and self-assessment of integrity programmes, and are aimed at companies and other legal entities, civil society organisations, state agencies, operators of the justice system and the expert professional community. Currently, the guidelines are not visible enough and very difficult to access on the Anti-Corruption Office website, requiring a specially targeted search.
- Include in the registry not only private companies and public entities, but other entities such as cooperatives.
- Make registration mandatory for companies and include a verification mechanism for the information they provide.

**COMMITMENT 3: Implementation of transparency and citizen participation tools under Executive Order 202/2017 for the Management of Apparent Conflicts of Interest in State Contracts.**

**THEMATIC AREA:** 2. Public Integrity

**COMMITMENT TIMEFRAME:** October 2018-March 2020

**COMMITMENT SOURCE:** UK Anti-Corruption Summit<sup>58</sup>

## Current level of progress in commitment implementation

Fulfilled

Partially fulfilled

X

Not fulfilled/dropped

This commitment adds to existing legislation, Executive Order N° 202/2017,<sup>59</sup> and introduces an obligation for the Anti-Corruption Office to carry out a specific procedure for managing situations

<sup>56</sup> Argentina Republic, Mexico and Argentina presented their platforms for the development of integrity in companies, <https://www.argentina.gob.ar/noticias/mexico-y-argentina-presentaron-sus-plataformas-para-el-desarrollo-de-integridad-en-empresas>

<sup>57</sup> Anti-Corruption Office Argentina, Guidelines for implementation of integrity programmes, [https://www.argentina.gob.ar/sites/default/files/lineamientos\\_para\\_la\\_implementacion.pdf](https://www.argentina.gob.ar/sites/default/files/lineamientos_para_la_implementacion.pdf)

<sup>58</sup> UK Anti-Corruption Summit, Argentina's Commitments, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/522967/Argentina.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522967/Argentina.pdf)

<sup>59</sup> Boletín Oficial de la República Argentina, Executive Order N° 202/2017, <https://www.boletinoficial.gob.ar/detalleAviso/primera/160466/20170322?busqueda=1>

that could constitute an apparent conflict of interest. In a first step, anyone who wants to contract with the state must submit a "Sworn Declaration of Interests" to make transparent any link with members of higher government authorities. If the declaration of interests suggests the existence of any links, Executive Order 202/2017 mandates that the contracting agency must use one of the following mechanisms to manage the conflict of interests: 1) signing an integrity pact – a formal transparency, ethics and integrity agreement 2) appointing social witnesses 3) enabling special oversight by a control agency, or 4) holding a public hearing.

According to the answers given by the Anti-Corruption Office to our request for access to public information for this report, 48 declarations of interests were submitted to the Anti-Corruption Office between November 2018 and April 2022 by people wanting to enter contracts with the state.<sup>60</sup> The list of declarations of interest that reported any of the links specified in Decree 202/2017 is published on the Anti-Corruption Office website.<sup>61</sup>

Regarding the mechanisms included in the executive order, the Anti-Corruption Office does not publish every step of the procedures on its website. When asked about the procedures in a public information request for this report, the Anti-Corruption Office gave no response. In an interview, it stated that "the most frequently used mechanisms were special oversight by control agencies and signing of integrity pacts". There is no evidence as to how often the different kinds of mechanism were used.

We therefore consider this commitment only partially fulfilled.

### Challenges to effective commitment implementation

The executive order does not distinguish between the different mechanisms and when to use them. This has resulted in only a few instances where mechanisms that include citizen participation have been used. In addition, the integrity pact mechanism often translates into the mere signing of a "declaration of integrity" that may not have the intended effect.

There is a lack of transparency over the rules and procedure manuals for the different mechanisms, as well as over which procedures are carried out after the declarations of interest were received. This creates a lack of traceability for civil society, journalists and citizens when monitoring the proposed mechanisms to hold the government accountable.

### Opportunities to accelerate commitment implementation

Argentina could benefit from the experience of the OECD as a global anti-corruption and integrity standard-setter, and from the OECD Guidelines for Managing Conflict of Interest in the Public Service.<sup>62</sup> The government could seek support to improve Argentina's approach for managing conflicts of interest by mapping areas and positions of risk within the public service.

### Recommendations

- Improve the visibility of declarations of interest published on the Anti-Corruption Office website, which are currently difficult to find. Rearrange the order in which they are listed, as

<sup>60</sup> See Annex 9.

<sup>61</sup> Argentinian Republic, List of Informed Cases, <https://www.argentina.gob.ar/anticorrupcion/prevencion/decretos-intereses/casos-informados>

<sup>62</sup> OECD, Recommendation of the Council on OECD Guidelines for Managing Conflict of Interest in the Public Service, <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0316>

the oldest declarations are positioned first and the more recent ones later, resulting in the better availability of increasingly outdated information.

- Train public officials and private-sector actors contracting with the state in how to complete the "Sworn Declaration of Interests". The Anti-Corruption Office should give guidance and offer training material to the parties involved.
- Publish the rules and procedures manual for each of the mechanisms specified in the executive order, in every case that requires their use.
- Publish the steps carried out by the Anti-Corruption Office after submission of the declaration, so it is clear which mechanism was chosen and why.

# RECOMMENDATIONS

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## Improve the implementation of existing commitments.

11. **Reintroduce public-private partnership contracting:** Public-private partnership contracting is a modality that has been highly recommended by international organisations such as the World Bank and the OECD. The government should also establish a regulation for the High-Level Reporting mechanism and include the mechanism in bid specification documents.
12. **Make registration in the Registry of Integrity and Transparency for Companies and Entities (RITE) mandatory for companies and include a verification mechanism** for the information they provide.
13. **Improve the visibility of declarations of interest** published on the Anti-Corruption Office website.
14. **Publish the rules and procedure manuals** for the management of apparent conflicts of interest in state contracting. In addition, publish steps in the procedures carried out after the submission of a declaration of interests, to ensure transparency over which mechanism was chosen and why.
15. **Train public officials and private-sector actors contracting with the state in how to complete the "Sworn Declaration of Interests"**. The Anti-Corruption Office should give guidance and offer training material to the parties involved.

## Make new commitments to close existing anti-corruption gaps

Within the framework of a new Public Ethics Bill, the Anti-Corruption Agency should:

16. **Increase citizen participation in the management of conflicts of interest**  
Currently the most used mechanisms are integrity pacts or special oversight by control agencies, in which the Anti-Corruption Office carries out the control procedure. In order to promote citizen participation, a new executive order should make mandatory the other two available mechanisms – participation of social witnesses, and public hearings.
17. **Create a whistleblower protection programme**  
The government should develop and manage a programme for whistleblowers, witnesses and victims of crimes against the public administration. The programme should offer whistleblowers advice regarding the judicial process; physical protection and psychological support. It should also develop action protocols for whistleblowers, covering all the preventive measures the programme provides.
18. **Develop a public integrity policy with a clear definition of "integrity"**  
The public integrity policy should define integrity as a set of actions, mechanisms and procedures aimed at preventing, detecting and correcting irregularities that may lead to acts of corruption within different state agencies, whatever their level or hierarchy. This policy must be based on four pillars:
  - ethical exercise of public functions

- transparency and maximum disclosure of acts of the public administration
- participation and social control of public management
- accountability.

In addition, the policy should include actions, mechanisms and procedures that take into account the entire anti-corruption value chain: prevention, detection, investigation, sanction, recovery and repair of the damage caused.

**19. Maximise transparency and disclosure of declarations of interests**

Declarations of interest allow detection and prevention of conflicts between the public and private interests (such as personal, professional, commercial or financial interests). All information held by public bodies should be transparent and accessible. Declarations of interest should be available to the public via the Anti-Corruption Office website using open data standards.

**20. Develop a sanctions regime for breaches of public ethics regulations**

The law enforcement authority should have the right to enact sanctions against agents and public officials who breach the law of public ethics and the related regulations. Currently each hierarchical authority follows different disciplinary procedures which are rarely administered within the permitted timeframe.

# ANNEX 1: LIST OF INTERVIEWEES

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Persons interviewed during the commitment monitoring – Buenos Aires, Argentina, May-August 2022. Poder Ciudadano contacted interviewees by public information request and email.

	Position	Organisation
1	Director of Transparency Policy Planning	Anti-Corruption Office
2	Director of Legal Affairs	Anti-Corruption Office
3	Administrative Management Secretary	Ministry of Public Infrastructure

# ANNEX 2: RESPONSE TO PUBLIC INFORMATION REQUEST I

  
NOTARIA  
CARNET 481

**ACTA DE EXTINCIÓN POR MUTUO ACUERDO DEL CONTRATO PPP DEL  
CORREDOR VIAL "A"**

Entre la DIRECCIÓN NACIONAL DE VIALIDAD, con domicilio en la Avenida Julio Argentino Roca N° 738, Piso 2° de la CIUDAD AUTÓNOMA DE BUENOS AIRES (en adelante el ENTE CONTRATANTE), representada en este acto por su ADMINISTRADOR GENERAL, Gustavo Héctor ARRIETA, y por la otra, el CONTRATISTA PPP del Corredor Vial "A", CONCESIONARIA VIAL CRUZ DEL SUR S.A., con domicilio en Moreno N° 957 Piso 10, Oficina 4, de la CIUDAD AUTÓNOMA DE BUENOS AIRES, (en adelante el CONTRATISTA PPP), representado en este acto por Julio José PAOLINI, en su carácter de presidente, en adelante LAS PARTES, suscriben el presente ACTA DE EXTINCIÓN POR MUTUO ACUERDO (en adelante el ACTA DE EXTINCIÓN). -----

Las PARTES manifiestan haber alcanzado un acuerdo sobre la EXTINCIÓN POR MUTUO ACUERDO del CONTRATO PPP del CORREDOR VIAL "A" suscripto el día 31 de julio de 2018, el que se instrumenta a través de la presente, conforme a las siguientes consideraciones y términos. Los términos que en esta ACTA DE EXTINCIÓN se utilizan en mayúsculas tendrán el significado asignado a los mismos en el CONTRATO PPP. -----

**PARTE PRIMERA: ANTECEDENTES Y CONSIDERACIONES**

Que por la Ley N° 27.328 se estableció el régimen relativo a los Contratos de Participación Público Privada, definiendo a los mismos en su Artículo 1° como aquellos celebrados entre los órganos y entes que integran el Sector Público Nacional con el alcance previsto en el Artículo 8° de la Ley N° 24.156 y sus modificatorias (en carácter de contratante), y sujetos privados o públicos en los términos que se establece en dicha ley (en carácter de contratistas), con el objeto de desarrollar proyectos en los campos de infraestructura, vivienda, actividades y servicios, inversión productiva, investigación aplicada y/o innovación tecnológica. -----

Que la mencionada ley se encuentra reglamentada por el Decreto N° 118 de fecha 17 de febrero de 2017, modificado por el Decreto N° 936 de fecha 14 de noviembre de 2017 y por el Decreto N° 967 de fecha 1° de noviembre de 2018. -----

Que, por la Resolución N° 147 de fecha 26 de enero de 2018, la DIRECCIÓN NACIONAL IF-2020-83831250-APN-PYC#DNY

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DE VIALIDAD convocó a Licitación Pública Nacional e Internacional con el objeto de contratar el diseño, construcción, ampliación, mejora, reparación, remodelación, operación, mantenimiento y explotación comercial de los Corredores Viales Nacionales "A", "B", "C", "E", "F" y "SUR", bajo el régimen de la citada Ley de Participación Pública Privada para el Proyecto "Red de Autopistas y Rutas Seguras PPP – Etapa 1" y aprobó la documentación licitatoria correspondiente. -----

Que, posteriormente, por Resolución N° 1.126 de fecha 18 de junio de 2018, la DIRECCIÓN NACIONAL DE VIALIDAD, adjudicó la licitación para el CORREDOR VIAL "A" al oferente conformado por las empresas PAOLINI HNOS. S.A. – VIAL AGRO S.A. – INC SpA. -----

Que con fecha 31 de julio de 2018, se suscribió el correspondiente CONTRATO PPP entre la DIRECCIÓN NACIONAL DE VIALIDAD y CONCESIONARIA VIAL CRUZ DEL SUR S.A., sociedad anónima de propósito específico constituida a los fines del contrato en cuestión. -----

Que con fecha 31 de julio de 2019, las PARTES suscribieron una Adenda al mencionado CONTRATO PPP, en la que se acordó extender el plazo para que el CONTRATISTA PPP presente el CIERRE FINANCIERO, diferir el requerimiento relativo al aumento de la GARANTÍA DE CIERRE FINANCIERO, reprogramar el PLAN DE OBRAS PRINCIPALES, extendiendo los plazos para el cumplimiento de determinadas obras a cargo del CONTRATISTA PPP, entre otras cuestiones. -----

Que con fecha 11 de marzo de 2020, la Organización Mundial De La Salud (OMS), declaró el brote del nuevo coronavirus como una pandemia, luego de que el número de personas infectadas por COVID-19 a nivel global llegara a 118.554, y el número de muertes a 4.281, afectando hasta ese momento a 110 países. -----

Que en dicho contexto y teniendo en consideración la modalidad contractual que regula a este CONTRATO PPP, a la fecha no se ha logrado dar cumplimiento con la finalidad tenida en miras por el ESTADO NACIONAL al celebrar el mismo, consistente en el diseño, construcción, ampliación, mejora, reparación, remodelación, operación, mantenimiento y explotación comercial del CORREDOR VIAL NACIONAL "A", ni tampoco con la expectativa del CONTRATISTA PPP. -----

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ANDREA ARIN  
NOTARIA  
CHILE

Que la satisfacción del interés de la comunidad que es contar con una Red de Autopistas y Rutas seguras, justifica que el ESTADO NACIONAL deba hacer uso de marcos jurídicos alternativos a la Ley N° 27.328 y dentro de esquemas económico financieros que resulten cumplibles. \_\_\_\_\_

Que como resultado de las reuniones de trabajo celebradas entre el ENTE CONTRATANTE y el CONTRATISTA PPP, LAS PARTES comparten que: (i) no es voluntad de las mismas continuar con el CONTRATO PPP, (ii) que en el contexto fáctico jurídico resulta conveniente una terminación del mismo, y (iii) la conveniencia de evitar litigios administrativos y judiciales, acordando extinguir por mutuo acuerdo el CONTRATO PPP. \_\_\_\_\_

Que la voluntad de LAS PARTES, formadora del vínculo contractual tiene la potestad no solo de modificar sus cláusulas, sino, como en el presente caso, de finalizar el mismo. \_\_\_\_\_

Que la presente se suscribe en aras de preservar los derechos de la administración, del co-contratante, y de los usuarios del CORREDOR VIAL. \_\_\_\_\_

Que, en virtud de las razones expuestas, LAS PARTES convienen la suscripción del presente ACTA DE EXTINCIÓN POR MUTUO ACUERDO del CONTRATO PPP del CORREDOR VIAL "A", en los términos del artículo 87 del CONTRATO PPP. \_\_\_\_\_

#### PARTE SEGUNDA: TÉRMINOS Y CONDICIONES DEL ACTA DE

##### EXTINCIÓN POR MUTUO ACUERDO

**CLÁUSULA PRIMERA: OBJETO.** LAS PARTES convienen en extinguir, de pleno derecho por mutuo acuerdo el CONTRATO PPP del CORREDOR VIAL "A", suscripto en fecha 31 de julio de 2018 entre CONCESIONARIA VIAL CRUZ DEL SUR S.A. y la DIRECCIÓN NACIONAL DE VIALIDAD, en los términos del ARTÍCULO 87 del CONTRATO PPP. \_\_\_\_\_

**CLÁUSULA SEGUNDA: FECHA DE EXTINCIÓN.** Las PARTES acuerdan como FECHA DE EXTINCIÓN el día 30 de noviembre de 2020. \_\_\_\_\_

**CLÁUSULA TERCERA: DECLARACIONES DEL CONTRATISTA PPP.** El  
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CONTRATISTA PPP declara a favor del ENTE CONTRATANTE que, a la fecha de suscripción de la presente, las declaraciones indicadas a continuación son ciertas, correctas y completas: \_\_\_\_\_

- a) El CONTRATISTA PPP y quien lo representa en este acto declaran que están debidamente autorizados y tienen plena capacidad para celebrar la presente ACTA DE EXTINCIÓN en los términos expuestos, en especial que no requieren obtener el previo consentimiento por escrito del REPRESENTANTE DE LAS ENTIDADES FINANCIADORAS. \_\_\_\_\_
- b) El CONTRATISTA PPP declara que no se han constituido ENTIDADES FINANCIADORAS a quienes deban requerirse el previo consentimiento y que no es necesaria la realización de ningún acto o procedimiento, ni la obtención de ningún consentimiento de otras PERSONAS para autorizar la celebración de la presente ACTA DE EXTINCIÓN y el cumplimiento de las obligaciones asumidas en virtud de la misma. \_\_\_\_\_
- c) El CONTRATISTA PPP declara que es una sociedad anónima existente y debidamente inscripta ante el registro público correspondiente a su domicilio social en la República Argentina conforme la LEY GENERAL DE SOCIEDADES y, que se mantiene vigente y sin modificaciones el último estatuto informado. \_\_\_\_\_
- d) El CONTRATISTA PPP declara que no tiene ningún impedimento conforme a la LEGISLACIÓN APLICABLE ni está sujeto a ninguna restricción contractual, judicial, arbitral, legal o cualquier otra naturaleza para (i) celebrar acuerdos con el ENTE CONTRATANTE, (ii) celebrar el ACTA DE EXTINCIÓN, (iii) cumplir con sus obligaciones en virtud de la misma. \_\_\_\_\_
- e) El CONTRATISTA PPP declara que no tiene conocimiento ni ha sido formalmente notificado de ninguna demanda, denuncia, juicio, arbitraje u otro procedimiento legal, en el que haya recaído sentencia, laudo u otro tipo de decisión firme y definitiva contra (i) el CONTRATISTA PPP y/o (ii) el ADJUDICATARIO o accionistas del CONTRATISTA PPP que, en cada caso, tenga por objeto prohibir o de otra manera impedir o limitar el cumplimiento de cualquiera de las obligaciones del CONTRATISTA PPP en virtud del ACTA DE EXTINCIÓN. \_\_\_\_\_

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# ANNEX 3: DECREE 202/17

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**Argentine Republic - National Executive Power**  
2017 - Year of Renewable Energies

## Exhibit

**Number:**

**Reference:** Annex II. Complementary Resolution Decree 202/17. Guidelines for the elaboration of an Integrity Pact

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### ANNEX II

#### GUIDELINES FOR THE PREPARATION OF THE INTEGRITY PACT – DECREE No. DECTO-2017-202-APN-PTE

**OBJECT.** The purpose of this document is to establish the guidelines that regulate the preparation and execution of the Integrity Pact within the framework of the procedures reached by Decree No. DECTO-2017-202-APN-PTE.

**DEFINITION:** The Integrity Pact is the agreement signed between all the actors involved in a procedure reached by Decree No. DECTO-2017-202-APN-PTE, in which the parties assume the commitment to act with transparency, ethics and integrity, subject to the responsibilities established in each case.

**BASES OF THE AGREEMENT:** The agreement will have at least the following content:

- a) The parties will undertake to collaborate mutually for the detection, suppression, investigation and sanction of corrupt practices through which some type of fraud is promoted or carried out against the National State.
- b) The officials or public employees involved must:
  - I.- refrain from requesting and/or accepting money or any gift so that they do or do not do something related to their functions or to assert the influence of their position before another public official or employee, in order for them to do or stop doing something related to their functions.
  - II.- maintain a transparent and equal treatment between the participants of the procedure in question, avoiding generating situations that favor preferential treatment towards one of them.
- c) For their part, the other signatories of the integrity pact will undertake to:
  - I.- refrain from giving or offering money or any gift so that the Officials or

intervening public employees do or refrain from doing something related to their functions or to assert the influence of their position before another public official or employee, so that they do or refrain from doing something related to their functions.

II.- refrain from entering into agreements between participants and potential participants of the procedure in question, with the intention of agreeing or coordinating positions in the selection procedure.

III- refrain from misrepresenting or hiding facts or circumstances with the purpose of obtaining a benefit or avoiding the fulfillment of an obligation;

IV- disseminate the integrity pact and the existing complaint channels among its dependents.

The terms of the agreement may be extended by the agency involved depending on the circumstances of the agreement case.

**PERMISSIBLE SANCTIONS FOR SUBSCRIBERS.** Without prejudice to the criminal, civil or administrative responsibilities provided for by the specific regulations, the signed Integrity Pact may establish as a sanction the exclusion of the bidding procedure or the corresponding process in case of non-compliance.

In the case of breaches by public officials, they will be subject to the sanctions provided in the corresponding disciplinary and criminal regimes.

**CONTROL OF THE AGREEMENT.** In order to ensure compliance with the Integrity Pact, the contracting body will control its compliance.

**BREACHES. HIGH-LEVEL COMPLAINT.** Any person who becomes aware of the non-compliance with the conditions agreed in an Integrity Pact, may inform the ANTI-CORRUPTION OFFICE of said circumstance, which after preliminary analysis of the feasibility of the complaint made within the framework of its powers, must notify the highest authority of the body in which the procedure is processed.

In cases in which the reported breach could lead to a breach of the Law for the Defense of Competition No. 25,156, the ANTI-CORRUPTION OFFICE will also notify said circumstance to the corresponding enforcement authority.

When a complaint about non-compliance with the Integrity Pact is filed, the contracting public body or entity must make merit and issue, prior to resolving the procedure that is try.



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**Exhibit**

**Number:**

**Reference:** Annex III. Supplementary Resolution Decree 202/17. Guidelines for the participation of the social witness

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**ANNEX III**

**GUIDELINES FOR THE PARTICIPATION OF THE SOCIAL WITNESS FIGURE – DECREE  
N° DECTO-2017-202-APN-PTE**

**OBJECT.** The purpose of this document is to establish the guidelines that regulate the participation of the figure of the Social Witness within the framework of the procedures reached by Decree No. DECTO 2017-202-APN-PTE.

**DEFINITION.** Social Witness shall be understood as any person or group of persons belonging to Civil Society, groups or experts from the scientific and/or academic community and/or Professional Associations, national or international, designated by organizations or entities to exercise control over the development and execution of the procedures reached by Decree No. DECTO-2017-202-APN-PTE.

**ANNOUNCEMENT.** The body or entity that has required the participation of the Social Witness will make an open Call with a minimum notice period of not less than TEN (10) calendar days from the last publication on the website of the calling authority, which may be extended depending on the type of procedure in question.

At the time of making the call, you must invite at least FIVE (5) people from Civil Society or from the academic and/or scientific field or from Professional Associations related to the theme that is developed in the respective process. It will be published for TWO (2) days on the website of the convening authority.

**SOCIAL WITNESS REQUIREMENTS.** To be chosen as Social Witness, the following requirements must be accredited:

- a) Technical knowledge of the subject related to the contractual object and/or special understanding of the respective procedure.
- b) Presentation of a "Sworn Declaration of Interests" through which they declare that they are or are not covered by the same relationships provided for in Decree No. DECTO-2017-202-APN PTE. The declared relationship with one or more officials of the convening jurisdiction, inhibits

to participate in this procedure as a Social Witness.

**IMPEDIMENTS.** They cannot be social witnesses:

- a) The agents and officials of the National Public Sector by themselves or by third parties, understanding as third parties the companies in which they and/or their spouses or cohabitants and/or their children, have a sufficient participation to form the social will.
- b) Provincial or municipal agents and officials.
- c) People who are prosecuted for crimes against the National Public Administration, or against public faith or for crimes included in the Inter-American Convention against Corruption or in the Convention of the ORGANIZATION FOR ECONOMIC COOPERATION AND DEVELOPMENT (OECD) to Combat Bribery to Foreign Public Officials in International Business Transactions.
- d) Persons who have not complied with their tax and social security obligations, in accordance with the provisions of the regulations.
- e) The contractors, auditors, suppliers, beneficiaries, assigned workers and/or any other person who has any direct or indirect patrimonial interest in the execution of the work, contract or procedure in which this mechanism is applied.
- f) People who have worked within the previous year in any of the companies that appear in the respective procedure with the intention of being a contractor, supplier or beneficiary of the object of the corresponding contracting or granting.
- g) People who are related by kinship within the fourth degree of consanguinity, or second degree of affinity with the contractor, auditor, supplier, beneficiary, assigned workers or public officials who have direct or indirect participation in the execution of the work, contract or program in which this mechanism is applied.

**SELECTION.** Once the term of the Call has expired, the responsible authority must make a well-founded selection of the person who will act as Social Witness within a period of FIVE (5) business days. More than one Social Witness may be appointed, considering the following aspects:

- a) The amount of the contract;
- b) The social, economic or institutional impact;
- c) The scarce concurrence of suppliers or bidders due to market conditions;
- d) The specific characteristics of the contract or procedure in progress.

**ACT OF AGREEMENT.** Once the person who will act in the respective procedure as a Social Witness has been selected, the convening body or entity will sign a Memorandum of Agreement with them, through which the activities to be carried out and the duties to which they will be obliged will be defined.

The Minutes must contain, at least, the following issues:

- a) The identification of the contract or procedure in which it will intervene, indicating the type of process, number of the administrative file for which it is processed, object of the procedure, estimated amount, responsible body, start date and purpose.
- b) The identification of the meetings to which they will attend.

- c) The total amount that will be recognized to the Social Witness as a consequence of the expenses that causes your participation, if applicable, and the requirements you must meet for payment.
- d) The commitments that you assume for your participation and the sanctions that your participation may entail breach.
- e) Estimated date of presentation of the Final Report and partial reports, in case of correspond.
- f) A declaration of not being included in any cause of impediment to exercise the function.
- g) Other issues that are considered necessary to ensure compliance with the object of the participation of the Social Witness.

**ACTIVITIES.** The Social Witnesses must carry out the following activities, within the framework of the contracting or respective procedure:

- a) Verify that the contracting process is carried out in accordance with the legal criteria already international standards on transparency and integrity.
- b) Receive reports, observations and suggestions submitted by citizens and organizations in relation to those activities that are the object of their intervention, in case to correspond;
- c) Require the information it deems necessary for the best fulfillment of its functions.
- d) Attend the work meetings convened within the framework of the pending procedure;  
Prepare and send to the corresponding authorities a Final Report containing the  
e) details of the activities carried out, recommendations and conclusions reached;
- f) Report to the competent authorities the facts or irregular actions that detect during your participation;
- g) Carry out their functions with objectivity, independence, impartiality, honesty and ethics.
- g) Render accounts of the expenses incurred to carry out its mission, in case of correspondence.

**INFORMATION.** The body or entity in whose scope the respective procedure is carried out must provide the necessary information for the Social Witness to carry out the activities that were assigned.

In case of non-compliance with the provisions of the preceding paragraph, the Social Witness may put said circumstance known to the ANTI-CORRUPTION OFFICE, which must notify the maximum authority of the body in which the procedure is processed in order to guarantee the availability of information and allow the effective exercise of the task entrusted to the Social Witness.

**ASSESSMENT OF THE REPORT.** At the time of issuing the pertinent administrative acts of the procedure, the authority must make merit of the conclusions and recommendations that have been made in the final report.

**BREACH.** Failure to comply with any of the duties assumed by the Social Witness will be sufficient grounds for departure from the respective procedure.

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Date: 2017.05.19 16:33:13 ART  
Location: Ciudad Autónoma de Buenos Aires

Laura Alonso  
Secretaria de Ética Pública, Transparencia y Lucha contra la Corrupción  
Oficina Anticorrupción  
Ministerio de Justicia y Derechos Humanos

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**Exhibit**

**Number:**

**Reference:** Annex IV. Supplementary Resolution Decree 202/17. Guidelines for conducting special oversight

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**ANNEX IV**

**GUIDELINES FOR THE PERFORMANCE OF OVERSIGHT OF CONTROL ORGANISMS –  
DECREE No. DECTO-2017-202-APN-PTE**

**OBJECT.** The purpose of this document is to establish the guidelines that regulate the application of the special oversight mechanism of control agencies within the framework of the procedures reached by Decree No. DECTO-2017-202-APN-PTE.

**DEFINITION.** Special oversight of a control body shall be understood as the concomitant control procedure carried out by one or more control bodies of the National Public Sector.

**SCOPE.** The control body may make recommendations or observations in order to promote the highest standards of integrity and transparency.

The participation of the control bodies in the special oversight offices will not limit the exercise of their own powers assigned by current regulations.

**PROCESS.** The Convening Authority that is processing a procedure reached in the terms of Decree No. 202/17, will submit a request for oversight to the selected control body(ies), accompanying the information it deems appropriate.

**APPOINTMENT OF THE OVERSEE.** Within FIVE (5) business days after the communication, the control body will inform the Convening Authority if it is in a position to assume that function and, if so, the identification of the official or officials designated as overseers.

**DEVELOPMENT OF THE OVERSIGHT.** The observer must review all the documentation that is linked to the procedure in question and witness all the acts - public and private - that are held from the moment of assuming this role. For such purposes, the Convening Authority must inform in advance of the meetings or acts that are planned within the framework of the procedure.

**ACTIVITIES AND DUTIES.** The Convening Authorities and officials appointed by the control bodies must carry out the following activities, within the framework of the contracting or

respective procedure:

- a) The Convening Authorities must:
  - I. Provide the observers in a timely manner and with due notice, the schedule of meetings, acts and other events scheduled within the framework of the process, in order to allow its stake.
  - II. Allow the participation of the inspector in all the activities that take place in the process framework.
- b) The control organisms and the overseers appointed by them must:
  - I. Respond in a timely manner to the oversight request made by the Authority Convening and appointing the corresponding officials for the purposes of its execution.
  - II. Verify that the contracting or granting process is carried out in accordance with the legal criteria, international standards in terms of transparency and integrity.
  - III. Sign the minutes or documents resulting from their participation in the process.

Prepare and send to the corresponding authorities a final report that contains the details of the activities developed, recommendations and conclusions reached.

ASSESSMENT OF THE REPORT: At the time of issuing the pertinent administrative acts of the procedure, the authority must make merit of the conclusions and recommendations that have been made in the final report.



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**Exhibit**

**Number:**

**Reference:** Annex V. Supplementary Resolution Decree No. 202/17. Guidelines for conducting public hearings

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**ANNEX V**

**GUIDELINES FOR THE CONDUCT OF PUBLIC HEARINGS - DECREE N° DECTO  
2017-202-APN-PTE**

**OBJECT.** The purpose of this document is to establish the guidelines that regulate the application of the Public Hearings mechanism within the framework of the procedures reached by Decree No. DECTO-2017-202-APN-PTE.

**PURPOSE.** The holding of the Public Hearing seeks to allow and promote effective citizen participation, confronting in a transparent and public manner the opinions, proposals, experiences, knowledge and existing information on the issues put in consultation.

**BEGINNING.** The Public Hearing procedure will be governed by the principles of equality, publicity, orality, informality and free of charge.

The specific studies carried out by competent technical areas of the body where the procedure in question was being processed will be taken as background information, if any.

They may be witnessed by the general public and by the media, duly accredited.

**ANNOUNCEMENT.** The convening authority will be the body where the respective procedure is processed and will convene the Public Hearing not less than TEN (10) calendar days prior to the scheduled date for its completion. The call must be published for TWO (2) days on the web pages of the Calling Authority.

**INSCRIPTION.** Registration will be free and free of charge and will be carried out by consigning the data provided in the form that as Annex II is part of Decree 1172/2003.

**PARTICIPANTS.** Any person who invokes a simple, diffuse or collective incidence right or interest, related to the issue to be discussed, may participate in the Public Hearing. Legal entities will participate through their representatives, accrediting legal status through the legal instrument

corresponding, duly certified, admitting the intervention of a single speaker on his behalf.

When speaking, documents and reports related to your presentation may be attached.

Every participant has the right to an oral intervention of at least FIVE (5) minutes. The presentations of the parties with common interests may be unified, which will not imply accumulating the time of participation.

People who attend the Public Hearing without prior registration may participate only by submitting questions in writing.

**CHANCE.** The Public Hearing must be held prior to the act of adjudication or granting in the procedure in question.

**REPORT.** The Convening Authority will prepare a closing report with the summary description of the interventions and incidents of the Hearing, which will not contain value assessments on the content of the presentations.

**SUPPLEMENTARY APPLICATION.** In everything not regulated by this document, the General Regulation of Public Hearings for the National Executive Power (Decree 1172/03) or the specific regulations for the procedure in question will be of supplementary application, when the Public Hearing is formally regulated.

# ANNEX 4: MEETING MINUTES

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## Meeting Minute – Director of Transparency Policy Planning, Anti-corruption Office

**Date:** May 17th, 2022

**Time:** 15.30

**Location:** Anti-corruption Office, Buenos Aires

**Participants:** Luis Villanueva (Anti-corruption Office), Alejandra Bauer, Lucía Baraldi (Poder Ciudadano)

- Poder Ciudadano had a meeting with Luis Villanueva, director of Transparency Policy Planning at the Anti-Corruption Office.
- We interviewed him about the commitments assumed by Argentina at the 18th IACC in Copenhagen.
- We asked him about the High-Level Reporting Mechanism in the bidding process of the Safe Highway and Roads Network Project. He told us that it was an announcement of a public policy claim that was never anchored in real circumstances. He believes that the mechanism was thought for a demand that did not exist and because of this there was only one file that was archived.
- We question about the implementation of Guidelines for the implementation of integrity programs and the recent launch of RITE. We asked about the functioning of the platform, the collaborative work process and how they planned to transfer this collective construction process to the training section. Likewise, we talked about a monitoring or follow-up mechanism for registered companies and possible assistance in the development of integrity programs for those companies that don't have one.
- Regarding the Implementation of transparency and participation tools for the management of Conflicts of Interest in State contracts, we asked if there is any control mechanism for cases of conflict of interest when it comes to direct inter-administrative contracting and what opportunities exist to expand the role of citizens as observers of possible conflicts of interest.
- We discussed the gaps in the national anti-corruption framework that the IACC commitments did not address and he gave us some recommendations to strengthen and deepen the commitments already made.

# ANNEX 5: PROPOSED MODIFICATIONS TO PUBLIC ETHICS BILL

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Ciudad Autónoma de Buenos Aires, 10 de diciembre de 2021

Titular de la Oficina Anticorrupción

S \_\_\_\_\_ / \_\_\_\_\_ D

Pablo Secchi, Director Ejecutivo de Fundación Poder Ciudadano – Capítulo Argentino de Transparencia Internacional, se dirige a Ud. A fin de acercar consideraciones y propuestas sobre el anteproyecto de norma de Ética Pública, dentro del proceso de Elaboración Participativa de normas, a fin de que, en caso de corresponder, sean tenidas en cuenta a incorporarse en el documento final.

Desde Poder Ciudadano celebramos la posibilidad de colaborar con la Elaboración participativa del proyecto de Ley de Integridad y Ética Pública y aprovechamos la oportunidad para acercar nuestras observaciones.

Resulta menester la actualización del régimen legal vigente, consagrado en 1998 mediante la Ley Nº 25.188, modificado por la Ley Nº 26.857 y complementado por diversos Decretos en relación con su implementación en el ámbito del Poder Ejecutivo Nacional. Su sanción significó un gran avance en la materia, pero no ha logrado cumplir con los objetivos propuestos durante su implementación. Independientemente de algunos

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aspectos perfectibles del articulado, la aprobación de un proyecto en la línea del borrador propuesto significaría sin dudas una serie de avances a nivel general por los cuales venimos abogando desde la sociedad civil. Entendemos que esto permitirá corregir los errores que el sistema anterior ha evidenciado.

En líneas generales el proyecto propone la ampliación de la información que las/os funcionarias/os públicas/os deben incluir en sus declaraciones juradas y la garantía de accesibilidad de la población a dicha información -tal como se reconoció judicialmente a instancias de Poder Ciudadano-, una regulación más extensiva de los conflictos de intereses. Además, la propuesta recoge varias cuestiones que hacen al sistema de integridad aplicable al ámbito de la administración pública nacional receptado en diversos decretos para institucionalizarlo en una única ley que regule a todo el Sector Público Nacional, extrapolando así algunas de las prácticas que se vienen impulsando desde el Ejecutivo a los otros Poderes del Estado, lo cual significaría un aporte sustancial a la credibilidad de las instituciones democráticas.

No obstante ello, creemos que algunos aspectos de la regulación propuesta y ameritarían una discusión en profundidad que permitan perfeccionar la redacción del texto definitivo a proponer al Honorable Congreso de la Nación, los cuales serán enunciados a continuación:

- **Composición del Sector Público Nacional**

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Destacamos la necesidad de hacer extensivas las obligaciones a otros sujetos que, si bien no son funcionarios públicos, revisten de una relevancia fundamental para el sistema democrático, contemplando especialmente entidades de integración diversa – como entes interjurisdiccionales o las empresas de participación estatal – y la necesidad de especificar a quién se aplican las previsiones de la ley en caso de convivencia entre distintos regímenes.

Asimismo, consideramos que la definición de funcionario/a público/a requiere de mayores precisiones en tanto la concepción propuesta excluye algunas situaciones existentes en la realidad del Sector Público Nacional. En este sentido, entendemos que deben contemplarse la existencia de personas que desempeñan funciones públicas bajo modalidades contractuales eventuales o mediante organismos internacionales así como la existencia de empleados y empleadas de instituciones de régimen legal mixto cuyas responsabilidades deberían estar claramente especificadas en la ley propuesta independientemente del régimen laboral aplicable.

- **Definición de Integridad**

A su vez, a fin de cumplir con los estándares mínimos en la materia, la definición de integridad no debe limitarse a cuestiones pertinentes al estado de derecho y la equidad, y debe especificarse a qué sectores debe alcanzar la gestión de la integridad.

A este respecto, recordamos que "Poder Ciudadano entiende por política pública de integridad el conjunto de acciones, mecanismos y procedimientos orientados a prevenir, detectar y corregir irregularidades que puedan derivar en hechos de corrupción dentro de las distintas dependencias

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estatales, cualquiera sea su nivel o jerarquía. Esta política debe basarse en cuatro pilares básicos: i. ejercicio ético de la función pública; ii. transparencia y máxima divulgación de los actos de la administración pública; iii. participación y control social de la gestión pública; y iv. rendición de cuentas. Además, estas acciones, mecanismos y procedimientos deben estar diseñados tomando en cuenta toda la "cadena de valor anticorrupción": prevención, detección, investigación, sanción, recuperación y reparación del daño producido"<sup>1</sup>.

Se advierte una falta de delimitación clara entre los principios de integridad y ética pública enunciados y los deberes de comportamiento previstos para los/as funcionarios/as públicos/as. Mientras que la formulación de principios debería establecer pautas de interpretación de la normativa en cuestión y los deberes de conducta, reglas claras a ser observadas por los sujetos obligados por la misma, en la redacción propuesta se confunden estos conceptos frustrando la finalidad de los capítulos I y II del Título II.

- **Publicidad Oficial**

Por otra parte, contemplar el respeto a las pautas que debe guardar la publicidad oficial entre los deberes de los/as funcionarios/as públicos/as podría invisibilizar la necesidad de contar con una regulación específica para la temática debido a la complejidad de la misma. A mayor abundamiento, la redacción propuesta podría confundirse con un retroceso en relación con la

<sup>1</sup> Integridad y transparencia: para la confianza ciudadana en las instituciones y en la política / Poder Ciudadano... [et al.]. - 1a ed. - Ciudad Autónoma de Buenos Aires: Konrad Adenauer Stiftung, 2020. 52 p., 20 x 14 cm.

normativa vigente en tanto se incorpora el deber de los/as funcionarios/as públicos/as de "velar por" determinadas características de la publicidad oficial cuando la normativa existente, como la Resolución 247/2016 de la Secretaría de Comunicación Pública de Jefatura de Gabinete de Ministros, expresamente excluye del régimen de las campañas de publicidad oficial a los mensajes o anuncios de contenido prohibido.

**- Protección de Denunciantes**

La incorporación del derecho a la protección en caso de ser reportante de hechos de corrupción, criminalidad económica o contrarios a la ley propuesta entre los derechos de los/as funcionarios/as públicos/as propuesta no debe ser solamente declarativa. La Convención Interamericana Contra la Corrupción obliga a nuestro país a establecer un sistema claro, específico y completo a este respecto y el proyecto debería contemplar mecanismos de efectiva implementación.

Tal como destacamos en el apartado anterior, consideramos de suma importancia que la inclusión del derecho a la protección de reportantes en este proyecto no debe obstar a la sanción de una normativa específica relativa a la creación de un programa de protección a denunciantes, testigos y víctimas de delitos contra la administración pública, ya que se trata de una herramienta fundamental para luchar contra la corrupción y la impunidad. Este programa debería brindar asesoramiento en lo referente al proceso judicial, protección física, contemplar mecanismos de contención y acompañamiento desde el punto de vista emocional, incorporando una perspectiva

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de género y contando con protocolos de acción de todas las medidas preventivas de carácter administrativo que pueda brindar.

- **Régimen de Sanciones**

En cuanto a las consecuencias del incumplimiento de los principios y deberes, sería deseable contar con un régimen de sanciones más específico, es decir, propio y autónomo a ser implementado por la autoridad de aplicación que correspondiere, especialmente considerando que cada jurisdicción se rige por procedimientos disciplinarios diferentes y nunca se resuelven en tiempos acordes a la problemática a atender. Esto es el resultado de atribuir la competencia sancionatoria a la autoridad jerárquica que corresponda en vez de la autoridad de aplicación, lo cual debilita sus capacidades de intervención, posibilitando la aplicación despareja del nuevo régimen.

- **Régimen de Declaraciones Juradas**

En cuanto al régimen de declaraciones juradas se observa que se proponen avances en relación con el régimen vigente, incorporando varios rubros a informar al modificar la declaración jurada patrimonial integral por la declaración jurada patrimonial "y de intereses" y si bien se recoge la resolución judicial arribada con motivo de la demanda de Poder Ciudadano, en ningún artículo del borrador se hace mención al principio de máxima divulgación.

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- **Conflictos de Intereses**

Algunos aspectos respecto al tratamiento del conflicto de intereses también resultan discutibles, como la definición propuesta, en tanto hace mención al "interés público" en lugar del "deber público" tal como lo recomienda la OCDE<sup>2</sup>. Más específicamente, la OCDE propone definir al conflicto de interés como "un conflicto entre el deber público y los intereses privados de un servidor público, en el que el servidor público tiene intereses personales que pueden influir de manera indebida en el desempeño de sus deberes y responsabilidades oficiales".

Asimismo, aun destacando la incorporación de nuevas herramientas para mejorar el control y seguimiento de los conflictos de intereses no puede dejar de advertirse que algunas cuestiones continúan sujetas a discrecionalidad de las autoridades, tales como el grado de vinculación con los intereses a declarar o la posibilidad de disponer medidas adicionales de transparencia y rendición de cuentas. También se advierten algunas inconsistencias en cuanto a la oportunidad de intervención de la autoridad de aplicación sobre la situación de intereses de los/as funcionarios/as públicos/as.

- **Período de enfriamiento**

<sup>2</sup> [https://www.oecd-ilibrary.org/governance/managing-conflict-of-interest-in-the-public-service\\_9789264104938-en](https://www.oecd-ilibrary.org/governance/managing-conflict-of-interest-in-the-public-service_9789264104938-en)

Las previsiones relativas a las limitaciones posteriores al cese en la función pública responden a la recomendación de la OCDE a la Argentina pero se siguen previendo plazos insuficientes, se omite regular el período de enfriamiento previo a ocupar un cargo público permitiendo que quienes provengan de determinado sector puedan ocupar cargos de jerarquía en el ámbito público, y las sanciones previstas no aparentan contar con una capacidad disuasoria real.

- **Régimen de Obsequios**

La prohibición de recepción de obsequios establecida como principio general, exceptuando los obsequios de cortesía, protocolo o costumbre diplomática, así como la prohibición general en función del cargo ejercido presentan una mejoría en relación con el régimen vigente pero las definiciones que se brindan son demasiado vagas y permiten una interpretación discrecional de los obsequios permitidos.

- **Gestión de Intereses**

Se establece la obligación de mantener un Registro de Actividades de Gestión de Intereses, pero incorporando una limitación considerable de los sujetos obligados. Al mismo tiempo, se desaconsejan intercambios regulares entre integrantes del Poder Judicial, el Ministerio Público y el Poder ejecutivo cuando la prohibición no debería recaer sobre la regularidad de las reuniones sino sobre el contenido de las mismas. Lejos de solucionar el problema de la connivencia del poder

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judicial con el poder político de turno, desaconsejar estos encuentros sólo incentiva su ocultamiento, en directa oposición al objetivo de la ley.

- **Autoridad de aplicación**

Finalmente, en cuanto a las autoridades de aplicación, se observa que se plantea un modelo similar al establecido por la Ley de Acceso a la Información Pública creando un órgano de aplicación en cada poder del Estado desconociendo que la implementación de dicha normativa en algunos casos aún se encuentra pendiente y en algunos casos no se siguieron las pautas de autonomía e independencia. Debería tomarse dicha experiencia para mejorar los mecanismos de designación y remoción de los/as titulares siendo fundamental en este aspecto garantizar la participación de la sociedad civil.

Sin más, y a la espera de continuar contribuyendo al debate, saluda  
a Ud. muy atentamente,



Pablo Secchi  
Director Ejecutivo  
Poder Ciudadano

RE-2021-120214197-APN-DPPT#OA

# ANNEX 6: RESPONSE TO PUBLIC INFORMATION REQUEST II

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Buenos Aires, 29 de junio de 2022

Ref: PEDIDO DE INFORMACIÓN PÚBLICA- Ley 27.275

## Oficina Anticorrupción

S \_\_\_\_\_ / \_\_\_\_\_ D

De mi mayor consideración:

Pablo Secchi, en mi carácter de Director Ejecutivo de la **Fundación Poder Ciudadano - capítulo argentino de Transparencia Internacional**-, conforme surge de las copias simples del acta de designación y del poder general de administración que se acompañan, con domicilio en la calle Piedras 547 de esta Ciudad (Tel: 4331-4925 e-mail: [accesoalainformación@poderciudadano.org](mailto:accesoalainformación@poderciudadano.org)), me dirijo a usted, en el marco de lo establecido en la Ley 27.275, con el fin de solicitarle información pública relacionada con los compromisos asumidos por la República Argentina en la 18ª IACC (International Anti-Corruption Conference). En particular se solicita respecto al compromiso N° 2 "Lineamientos de Integridad para el Mejor Cumplimiento de lo establecido en los artículos 22 y 23 de la Ley N° 27.401 de Responsabilidad Penal de Personas Jurídicas":

1. Respecto al compromiso N° 4 del Plan Nacional Anticorrupción "Cláusula de Integridad en Contrataciones de obra pública y bienes y servicios".
  - a. Indique las contrataciones de obra pública y bienes y servicios en las que se implementó la Cláusula de Integridad. Precise objeto de la contratación, duración del contrato y monto.
  - b. Indique objeto y contenido de la cláusula de integridad en Contrataciones de obra pública y bienes y servicios.
  
2. Respecto al compromiso N° 116 del Plan Nacional Anticorrupción "Plan de Promoción de Programas de Integridad de personas jurídicas".
  - a. Indique fecha de ejecución, objetivos y resultados del "Plan de Promoción de Programas de Integridad de personas jurídicas"
  - b. Precise las actividades que se llevaron a cabo en el marco del "Plan de Promoción de Programas de Integridad de personas jurídicas".

Se recuerda que, conforme el artículo 4: "Toda persona humana o jurídica, pública o privada, tiene derecho a solicitar y recibir información pública, no pudiendo exigirse al solicitante que motive la solicitud, que acredite derecho subjetivo o interés legítimo que cuente con patrocinio letrado."

Y que, según el artículo 5: "La información debe ser brindada en el estado en el que se encuentre al momento de efectuarse la solicitud, no estando obligado el sujeto requerido a procesarla o clasificarla."



República Argentina - Poder Ejecutivo Nacional  
Las Malvinas son argentinas

**Nota**

**Número:** NO-2022-83116770-APN-DAJ#OA

CIUDAD DE BUENOS AIRES  
Miércoles 10 de Agosto de 2022

**Referencia:** EX-2022-65600708- -APN-OA#PTE

**A:** Poder Ciudadano (...),

**Con Copia A:**

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**De mi mayor consideración:**

De acuerdo a lo informado por la SUBSECRETARIA DE PLANIFICACIÓN DE POLÍTICAS DE TRANSPARENCIA de la Oficina Anticorrupción, este organismo viene llevando adelante la iniciativa del Registro de Integridad y Transparencia para Empresas y Entidades de Argentina (RITE) destinado a crear, mejorar, robustecer y analizar los programas de integridad a los que se refieren los artículos 22 y 23 de la ley 27.401. En el sitio web [rite.gob.ar](http://rite.gob.ar) se puede acceder a información respecto de la iniciativa.

De todos modos, corresponde señalar que se han concretado 4 hitos importantes del plan de trabajo destinado a implementar este Registro:

1. Aprobación de los formularios del registro sobre programas de integridad y debida diligencia. Estos formularios fueron elaborados en mesas de trabajo de las que participaron más de 80 profesionales especializados en la temática y en las que se recibieron más de 500 comentarios y aportes que fueron considerados por la Oficina Anticorrupción. El formulario referido a Programas de Integridad es uno de los elementos fundamentales del RITE. Este cuestionario contiene preguntas sobre las políticas llevadas adelante por las empresas o entidades que permitirán visualizar el nivel de desarrollo de sus programas de integridad. Dicho formulario, además, posibilitará identificar los aspectos necesarios para lograr mejoras en los mismos. A su vez, también se ha elaborado el formulario de Debida Diligencia, el cual resultó fruto del consenso arribado en los más de 35 encuentros llevados adelante por la Oficina Anticorrupción con actores del sector privado, sociedad civil y academia. Las respuestas de dicho

formulario, que no impactarán en el nivel del avance dentro del RITE, permitirán acceder a información de interés al momento de realizar la vinculación contractual.

2. Puesta en línea del Portal RITE, un espacio digital con información, documentos y recursos para acompañar a las organizaciones en el desarrollo de programas de integridad, como paso previo a la puesta en marcha del registro. La principal sección incorporada al portal es la Caja de Herramientas, ya que ofrece recursos de aprendizaje y guías sobre RITE con material formativo, videos, plantillas y documentos modelo para acompañar el fortalecimiento de las acciones de integridad de empresas y entidades. Además, presenta los convenios firmados con las universidades que aportarán a la generación de nuevos materiales formativos. Otro aspecto destacado es que, tras la publicación de la resolución, el Portal RITE pone a disposición los formularios que estarán contenidos en el registro, con los componentes y las instancias que deberán recorrer aquellas organizaciones que quieran mostrar su compromiso con la ética y la transparencia para avanzar hacia la madurez de sus Programas de Integridad.

3. Realización de un encuentro presencial que convocó a más de 150 profesionales del compliance. Durante el encuentro, que se realizó en la sede del Consejo Profesional de Ciencias Económicas de CABA, el jueves 23 de junio, se presentaron los avances del registro y hubo dos paneles con referentes del sector público, privado y de la sociedad civil que conversaron sobre la experiencia colaborativa en la etapa de diseño del RITE y sobre los desafíos e incentivos para sumarse a la plataforma. Además, entre el 1 de enero de 2022 y el 30 de junio de 2022, la OA celebró 8 (ocho) convenios de colaboración para la promoción de RITE, estos fueron con Aerolíneas Argentinas, Universidad del Aconcgua, Administración Federal de Ingresos Públicos (AFIP), Universidad Siglo 21, Instituto Nacional de Asociativismo y Economía Social (INAES), la asociación civil mexicana Consejeros en Integridad y Cumplimiento Normativo (CICN), Universidad de Buenos Aires (UBA) y el Banco de Inversión y Comercio Exterior (BICE).

4. Puesta en funcionamiento del Simulador RITE. Plataforma de entrenamiento para futuros adherentes al Registro.

Por su parte, en relación con las actividades de divulgación y sensibilización sobre RITE, se realizaron reuniones de trabajo y presentaciones en el Ciclo federal sobre integridad en Ushuaia: corrupción, género y patriarcado, en el Encuentro de Cooperación Internacional en Integridad y Transparencia Internacional, en el Encuentro sobre integridad, género y derechos humanos organizado por Women In Compliance Argentina, en la segunda reunión sobre Apertura de la Competencia organizada por el Ministerio de Obras Públicas, en el Encuentro de la Red de Áreas y Enlaces de Integridad, en la provincia de Mendoza en el marco del Programa Federal para la Promoción de las Políticas de Integridad y Transparencia en Provincias y Municipios, en una actividad conjunta con el Ministerio de Salud, con la Fundación Liderazgos y Organizaciones Responsables (FLOR), en el Instituto para el Desarrollo Empresarial de la Argentina (IDEA) y con la Unión Argentina de Proveedores del Estado (UAPE). En cuanto a la difusión y la comunicación externa de RITE, Por último se realizaron talleres con la Unión Argentina de Proveedores del Estado y actividades de presentación del simulador con la Cámara Alemana y la Cámara Británica.

Asimismo se informa que se crearon dos nuevos medios digitales: el Canal RITE en Youtube y la más reciente, la Página de RITE en LinkedIn.

Por otro lado corresponde señalar que como parte de la ampliación de los componentes a ser incorporados en el Registro de Integridad y Transparencia de Empresas y Entidades (RITE) durante el mes de marzo se comenzó a trabajar en la elaboración de los cuestionarios que serán incorporados a la plataforma, y que recogerán información sobre políticas y compromisos vinculados con Derechos Humanos y ambiente adoptados por las empresas. Al igual que en la primera etapa, la metodología de elaboración de los cuestionarios del RITE se realizará de modo colaborativo con diversos actores, tanto del sector público, como del sector privado y la sociedad civil. Así, durante

el proceso se realizarán espacios de consulta y discusión, con el objetivo de elaborar un cuestionario que no sólo cuente con los consensos necesarios, sino sean 33 adaptados a la realidad de los usuarios de la plataforma (Empresas Públicas, PyMEs, entre otras). En lo que respecta a las actividades preparatorias, se está realizando un mapeo de normas, tanto de cumplimiento obligatorio como de voluntario, analizando normativa nacional, regional e internacional, a fin de tener un conocimiento acabado sobre los compromisos ambientales y de Derechos Humanos adoptados, y cómo estos permiten consolidar un camino hacia el cumplimiento de la Agenda 2030. Hasta el momento se han analizado más de ochenta normas nacionales e internacionales y se han realizado reuniones con el Ministerio de Género y el de Ambiente, referentes de empresas (a través de Cámaras y entidades representativas), Organismos Internacionales (Proyecto CERALC de Naciones Unidas) y especialistas en temáticas vinculadas al compliance como la agrupación Women in Compliance, entre otras instituciones y referentes.

LA OA viene trabajando dentro del marco del proyecto PNUD, en la aplicación del RITE a diferentes ODS. Entre ellos los que refieren a igualdad de género, respeto por los DDHH y cuidado del medio ambiente.

[https://www.argentina.gob.ar/sites/default/files/oa\\_-\\_informe\\_de\\_gestion\\_semestral\\_2022\\_.docx.pdf](https://www.argentina.gob.ar/sites/default/files/oa_-_informe_de_gestion_semestral_2022_.docx.pdf)

Sin otro particular saluda atte.

Digitally signed by Gestión Documental Electrónica  
Date: 2022.08.10 14:23:29 -0300

Ricardo PAL  
Director  
Dirección de Asuntos Jurídicos  
Oficina Anticorrupción

# ANNEX 7: RESPONSE TO PUBLIC INFORMATION REQUEST III

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I am pleased to address you in order to send the information held in this Undersecretariat in relation to the request for access to public information that you process through EX-2022-23385230- -APN-DNAIP#AAIP.

In this sense, it is made known that, as of December 10, 2019, this Anticorruption Office (OA) undertook a shift in its strategy, strengthening the preventive policy and the development of strategies that would allow transparency and integrity in the management public. Within this framework, progress was made on various initiatives aimed at strengthening a comprehensive and preventive view of anti-corruption policies. All this developed work aims to configure a National Integrity System where different elements make up a holistic articulation.

As an essential part of the National Integrity System, this Office has since aimed to strengthen the **capillarity** of the integrity policy by strengthening the network of links and the creation and strengthening of integrity areas and programs. To date, 160 dependencies have one or a referent on the subject and 34 organizations have integrity areas, which facilitates the development of tasks of design and implementation of specific policies for the jurisdictions.

Now, if we bet on capillarity, we need to strengthen inter- **institutional coordination**: the greater the number of actors participating in a system, the greater the risk of duplication and overlapping, as well as the need for effective coordination. For this reason, through Administrative Decision No. 592/2021, we advanced in the creation of a **National Integrity and Transparency Table** that allows the design of clear, formal and/or informal mechanisms for horizontal and vertical cooperation and coordination between the actors. and sectors in order to prevent fragmentation, overlap and gaps, and ultimately ensure policy coherence and impact. The Mesa aims to improve inter-institutional coordination and promote coherent and mutually reinforcing policies. This action is clearly articulated with the National Integrity Strategy that provides the guidelines for the coordinated work of the agencies linked to the design and implementation of integrity policies.

Among its first activities, the Roundtable carried out a National Integrity Survey that provides evidence on the status of the integrity and transparency policies of the National State, providing it with the ability to prevent risks and strengthen capacities in a cohesive and integrated manner. This [survey](#) included two questionnaires [addressed](#) to the National Public Administration and another to Companies with State Participation.

Likewise, we are committed to strengthening the **planning** of preventive policies. The mainstreaming of transparency in public management requires clear guidelines on what constitutes a comprehensive transparency policy and an institutional framework for its implementation in the sphere of competence of the different agencies. The existence of a centralized body such as this Office does not function as an automatic guarantee of the implementation of the guidelines established throughout the National Public Administration. For this reason, the articulation of this specific knowledge with the particularities of the organizational reality of each agenda and jurisdiction is required.

In this line, the OA developed the **National Integrity Strategy** (ENI) that outlines a roadmap for the actions of the organizations. In it, a basic core of initiatives is deployed that can be mainstreamed, shared and implemented with the greatest capillarity and breadth possible among agencies, companies with state participation and other state entities of the National Public Administration. In addition, the intersection of perspectives between integrity policies and human rights, gender and diversity, care for the environment, among others, is incorporated.

It is within this systemic framework of action that the policies on which the request is consulted and on which information will be provided have been developed. It is worth remembering that both the ENI, as well as the RITE or the National Board of Integrity and Transparency, are actions that take place after the applicant's date of interest (since November 2018), so information will be provided here only for the period from the one that syndicates the existence of said initiatives.

Likewise, other actions to **reinforce the integrity in the contracting of goods and services**, have been in the first instance and in a context of exception and health emergency, the development of the OA of a series of recommendations to strengthen the integrity and transparency of contracting held in the framework of the COVID-19 emergency.

Through Resolution 5/20, a set of good practices that arise from the analysis of various public contracting processes were approved. In line with these recommendations, the OA carried out different training workshops for public bodies, with "Recommendations to Strengthen the Transparency and Integrity of purchases and contracts processed in the framework of the COVID-19 Emergency", whose objective is to transfer knowledge in matters of transparency, integrity policies, access to information and accountability (See Dissemination and training section in [the OA 2020 Management Report](#)).

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On the other hand, in a joint effort with the Ministry of Health, purchases and contracts were published (<http://datos.salud.gob.ar/>) in the framework of the COVID-19 emergency in open formats.

A similar experience occurred in the Ministry of Transport with the publication of purchases and contracts managed in an emergency ([https://servicios.transporte.gob.ar/gobierno\\_abierto/](https://servicios.transporte.gob.ar/gobierno_abierto/)). In turn, with this Ministry, actions were coordinated to contribute to the development process of the [Public Works Observatory](#), and the design of the [Investment Map](#), with the aim of strengthening transparency, integrity, efficiency, effectiveness and innovation. of public works contracting, execution and monitoring systems.

Likewise, the Office prepared and published [a Guide for the Creation and Strengthening](#) of Integrity and Transparency Areas in National, Provincial and Municipal Jurisdictions. It is a contribution of resources and tools that facilitate the design and implementation of a comprehensive transparency policy at the national, provincial and municipal levels. The document reviews the different experiences of organizations —both national, provincial and municipal— dedicated to integrity and transparency and reviews all the functions that these areas can carry out, such as

training programs, control of affidavits or **regulations on purchases and contracts**.

Added to these actions are those related to the Practical Guide for the development of integrity policies and programs in the field of Companies with State Participation **whose approval file is in process**.

This action developed within the framework of a Technical Cooperation of the Inter-American Development Bank (IDB) with the Argentine Republic, involved the development of integrity standards in companies with state participation. This Cooperation provides for: (i) defining the scope of the regulatory frameworks for integrity and transparency in the field of SOEs; (ii) identify integrity and transparency policies and practices developed by SOEs; (iii) identify problematic knots for the development of sectoral guidelines on this matter and (iv) make recommendations for the implementation of integrity and transparency policies and tools in the sector.

Thus, a series of meetings were organized that made it possible to identify the main challenges faced by companies to carry out management with high standards in terms of integrity and transparency, as well as to exchange experiences and good practices in this area. The OA organized working groups with different actors from the public sector, international organizations and civil society. Among all, the main challenges faced by public companies to carry out were identified. Likewise, good practices were shared and experiences were exchanged aimed at carrying out management with high standards in terms of integrity and transparency. These meetings were a key input for the preparation of a proposal for a "Practical Guide for the development of Integrity Policies".

In this sense, we invite the Integrity Liaisons of ministerial bodies that have public companies under their jurisdiction to [discuss the content of the Guide, in order to advance in the final draft. The Guide is the result of](#) an exhaustive analysis of the regulatory frameworks and policies of integrity and transparency in the field of Companies With State Participation. In this sense, the Guide aims to be a reference and guidance material for the design and implementation of integrity and transparency policies in the field of companies and entities with state participation.

For its part, in relation to the actions aimed at **promoting and disseminating the regulatory framework on Integrity Programs aimed at legal entities covered by Law No. 27,401**, these have been framed in the actions developed within the framework of the **Registry of Integrity and Transparency for Companies and Entities (RITE)**.

The Anti-Corruption Office launched through Resolution EX-2021-25636566-APN-OA#PTE, the design of the first registry of integrity and transparency for companies and entities in Argentina, with the purpose of contributing to the development, improvement and maturity of the Integrity Programs (IP), to the exchange of good practices and to promote transparent environments in business and markets.

The RITE platform will have two main sections:

- \* The registration itself, through a self-administered form for identify the PI level and aspects to improve.

- The support training material, through a toolbox with documents, models and online training, among others.

RITE will allow Argentine organizations to account for their integrity programs and make their commitment to ethical business visible. The initiative has the support of the Inter-American Development Bank (IDB) and accompanies the mission that the OA has been carrying out since December 2019 by promoting the prevention of corruption and driving actions so that the public and private sectors actively participate in corruption. consolidation of transparency policies in the framework of contracts with the State.

The registry will collaborate with the effective implementation of Law 27,401 on Criminal Responsibility of Legal Entities, allowing to improve compliance with the requirements established in the rule for contracting with the State, as well as the knowledge and evaluation by public offices of the programs. integrity of who your suppliers or contractors are.

RITE will be a platform aimed at companies (private, public and with state participation) and non-profit entities, whatever their size, interested in showing their commitment to the development of integrity actions to improve the transparency of their operations. Emphasis will be placed on commitment, since to enroll in RITE it will not be a requirement to have an implemented integrity program. This point is of special interest to smaller companies, which may not have the necessary resources to allocate to these efforts and who will be able to make use of the tools that the platform will make available.

RITE will be a platform for learning, exchange and growth promotion; a space for companies to develop and mature their IP and incorporate innovative perspectives integrating issues that sometimes tend to be dissociated, such as integrity and gender or integrity and human rights.

The initiative plans to generate alliances with different government agencies, which will be key to the generation of incentives and the interoperability of records or monitoring and follow-up activities.

Within the framework of the development of this tool, [on April 27, 2021](#), the OA presented the objectives, progress and first actions for the design of the integrity and transparency registry of Argentina. At the opening of the meeting, the head of the OA highlighted the challenges of the articulation between public administration bodies and the different sectors of society, and invited everyone to "a collective initiative to install a prevention tool." He added that it is an "agile and friendly tool, where organizations and companies will be able to give proof of their progress, their integrity programs and those contributions to the improvement of managerial performance. The challenge is to become promoters of this type of tools for companies".

[On May 19, 2021](#), the Undersecretary of Integrity and Transparency and the National Director of Public Ethics participated in a meeting organized by the Argentine Association of Ethics and Compliance (AAEC) to discuss the progress of the RITE and consolidate the synergy between the institutions .

On [June 3, 2021](#), the progress of the Integrity and Transparency Registry for Companies and Entities was presented at the First Ordinary Annual Meeting of the Forum of Administrative Investigation Prosecutors and Anti-Corruption Offices.

On June 24, 2021, the head of the OA participated in the CCO FORUM and through his presentation presented the advances of RITE along with other OA policies.

On [June 29, 2021](#), the registration initiative was presented to the Advisory Council of the National Integrity Strategy.

On [July 1, 2021](#), the Undersecretary in charge of the Transparency Policy Planning Directorate presented RITE at the Global Compact event on the Passport to Integrity program.

On [July 14, 2021](#), the head of the OA participated in the *Amoham Ethics & Transparency Forum*, spoke on ethics and transparency and presented the advances of RITE, among other initiatives of the Office.

On [August 4](#), the OA and the Argentine and Mexican chapters of the *World Compliance Association* held a virtual conference where they presented the integrity platforms of both countries.

On [August 19](#), the undersecretary in charge of the DPPT participated in a meeting organized by the Business Lawyers Network of the Institute for Business Development of Argentina (IDEA) where he spoke about RITE.

On [August 25, 2021](#), the OA participated in the activity organized by the Center for the Implementation of Public Policies for Equity and Growth (CIPPEC) in which the RITE guidelines were presented.

On [September 15](#), in the framework of the 36th Plenary Meeting of the Committee of Experts of the Follow-up Mechanism for the Implementation of the Inter-American Convention against Corruption (MESICIC), the OA presented on good practices and information technologies applied to prevent and combat corruption, including the RITE platform.

On [October 21](#), a training on integrity and transparency was given to cooperatives of the popular economy; the RITE platform and its advantages for the cooperative sector were presented.

On [December 2](#), RITE was presented to the Argentine Chamber of Commerce and Services.

On [December 7](#), a RITE presentation was made at the meeting on actions to strengthen integrity in companies organized by the University of Aconcagua and Poder Ciudadano.

Between the months of June, July and August, informative and linking meetings were held with the Argentine-German Chamber of Industry and Commerce (AHK), the Argentine Union of State Suppliers, the Chamber of Construction, the IAE Business School of the Universidad Austral, the Argentine Association of Ethics and Compliance, the Council of Professionals in Economic Sciences, the University of Aconcagua, the World Compliance Association, the Spanish Chamber of Commerce, the United States Chamber of Commerce in Argentina, the Network of Organizations Against Corruption, the University of San Andrés, the Argentine Business Council for Sustainable Development and the University of Buenos Aires, as well as with authorities of companies with majority state participation tending to incorporate them into the initiative, including Argentine Water and Sanitation (AySA), Aerolíneas Argentinas, Fiscal Oilfields (YPF) and Ceamse.

Likewise, between [August 31](#) and [October 28](#), the OA coordinated 8 RITE Working Groups in which more than 80 compliance specialists from the private, academic, civil society, government and company sectors with state participation took part. resulting in the elaboration of the main contents of the record. They were made up of representatives from organizations such as AHK, Amcham, IDEA, AAEC, Poder Ciudadano, Universidad de San Andrés, Universidad del Aconcagua, Universidad de Buenos Aires, Banco Nación, Banco Provincia, AySA, IAPG, CIPPEC, FADEA, Camarco, Alliance for Integrity, Professional Council of Economic Sciences of the City of Buenos Aires, Bar Association of the City of Buenos Aires, Di Tella University and the World Compliance Association, among others.

The first product of these tables was the preparation of forms with self-administered questions for the development of integrity policies that are in the process of being formalized. For this purpose, a link is attached with access to them:

1. General Integrity Policies Form and ECPEs [Link](#).
2. Due Diligence Form. [Link](#).

In turn, these work and institutional linkage meetings served as a space for the exchange of ideas and a mechanism to generate adherence to the project.

Subsequently, the content of the platform was made available to the computer team specially contracted by the Ministry of Justice and Human Rights to carry it out. With them began the process that will culminate with the online site and the fully operational system.

Consequently, during 2021 and 2022, the OA entered into different collaboration agreements with local and international organizations to promote the RITE platform: with the [World Compliance Association](#), to work together on the design and implementation of RITE; with the [Argentine Aircraft Factory \(FAdeA\)](#), for joint work with a view to future accession to the registry; with the [Province of Chaco](#), to promote collaboration for provincial institutional strengthening and incorporation into RITE; with the company [YPF SA](#), with [Aerolíneas Argentinas](#); with the [Banco de la Nación Argentina \(BNA\)](#), a [Collaboration Framework Agreement](#) and a [Specific Agreement](#) were signed for the

RITE; with [AySA SA](#), in order to collaborate reciprocally in the design and implementation of the Registry. The same happened with [the AFIP](#) and with the Bank of Investment and Foreign Trade (BICE).

Likewise, for the development of the platform's Tool Box, which will contain training material for companies, agreements were signed with the [21st Century University](#) and the [Aconagua University](#).

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#### ***Training activities within the framework of the INAP***

**platform** The Transparency Policy Planning Directorate, which coordinates the training activities of the Anticorruption Office, has training proposals that are publicly offered and accredited through the platform of the National Administration Institute Public. In coordination with the INAP, the Anti-Corruption Office currently has self-managed, tutored and synchronous courses within its 2021 Training Proposal. A novelty in this line of work is the incorporation of a new "virtual synchronous" modality via INAP: this training modality involves holding meetings through videoconferences (through the WEBEX platform), which are combined with a classroom in the Virtual Campus of the INAP for the incorporation of reading material and a subsequent comprehensive evaluation activity. Within this framework, in 2021, 2 commissions of the synchronous course "Integrity and Public Ethics Guidelines: essential aspects of corporate responsibility for corruption (Law No. 27,401)" were issued. This activity aims to develop the essential aspects of the corporate responsibility regime, as well as to conceptualize an integrity program and understand the main legal effects of its adoption by companies.

#### ***Other awareness-raising activities developed with the private sector***

In order to create a space for permanent dialogue (for collective action) with the private sector and form a community to debate and produce transparency policies, from the OA and in particular from the DPPT, Different actions have been carried out since 2020.

Among them, the discussion organized on May 20, 2020 by the World Compliance Association (WCA) stands out, an international association made up of professionals and organizations interested in the world of "compliance" that promotes compliance activities and the development of tools for a proper protection against certain crimes. In the event, the Head of the Organization presented the main work guidelines in the OA.

On July 31 of the same year, the OA participated in the meeting "Gender and Transparency: two attributes for fair and equal management", organized jointly with the World Compliance Association and developed virtually. Authorities from the Office of Institutional Transparency, Ministry of Justice and Human Rights, Province of Buenos Aires also participated; the World Compliance Association Argentina; the "Women in Equality" Foundation and the Administrative Investigations Office of the Public Prosecutor's Office.

On August 6, 2020, the OA was invited to speak at the first meeting of 2020 of the Compliance Commission in the Public Sector of the Argentine Association of Ethics and Compliance (AAEC), where it spoke on the implementation of integrity policies at the inside public bodies.

On August 28 of the same year, the OA presented at the IV Conversation "Transparency and Compliance Programs in the Public Sector" organized with the World Compliance Association, Argentine Chapter.

On September 16, 2020, the OA participated in the web event "Culture of compliance: alliances for sustainable development, compliance and SMEs and sustainable compliance", organized by the Argentine-German Chamber of Industry and Commerce.

On September 24, 2020, the OA participated in a web meeting organized by the United States Chamber of Commerce in Argentina called "Anti-corruption processes in the face of the emergency."

On October 16, 2020, the head of the OA spoke at the meeting on "Compliance in times of COVID", organized by Enel Argentina, at the closing of the "Ethics Week".

On December 9, 2020, International Anti-Corruption Day, the OA participated in the virtual meeting "Passport to Integrity". This event served as the closing of the program promoted by the Alliance for Integrity, whose objective is to stimulate the strengthening of integrity and compliance practices in Small and Medium-sized Enterprises (SMEs) and in State-Owned Companies (EPEs) and which it accompanied in the last six months Argentine companies to improve their integrity standards.

On February 23, 2021, the OA participated in the webinar "Collective action: How to create ethical and sustainable environments - The importance of Integrity Pacts for SMEs" organized by the Compliance Competence Center of the Argentine Chamber of Industry and Commerce- German. The seminar is part of a project that seeks to create capacities and raise awareness of the importance of a culture of integrity, based on the exchange of knowledge and experiences, training with experts in compliance, and involvement in Integrity Pacts that allow creating businesses. ethical and sustainable. The panel was moderated by the Executive Director of Poder Ciudadano, the Argentine chapter of Transparency International. Finally, it should be said that the seminar is part of the Project of the United Nations Organization against Drugs and Crime (UNODC) for the rapid implementation of the United Nations Convention against Corruption (UNCAC) and had the support of Alliance for Integrity and UK Aid.

Similarly, on March 19, 2021, the OA participated in the Workshop on Sustainable Public Procurement: A management model to apply in Argentina, held within the framework of the network of local governments for corporate sustainability of the Global Compact. The activity, aimed at companies, governments and social organizations, aimed to include management with greater transparency, traceability, effectiveness, sustainability in terms of its environmental and social impacts and effective accountability in public procurement processes; incorporate tools that coincide with the ten principles of the Global Compact that have an impact on purchases of

goods and services by government agencies and their links with the private sector; and learn about standardizing instruments such as ISO 20400:2017.

An activity to raise awareness on the Registry of Integrity and Transparency for Companies and Entities was also carried out for the San Juan Lawyers' Forum, led by a UNDP consultant.

***Initiatives and activities of the National Integrity Strategy*** The

National Integrity Strategy (ENI) incorporates a basic and common core of guidelines that considers specific actions to strengthen integrity in purchases and contracting of goods and services in the National Public Administration. Thus, the strategic guidelines on "Development of public policies of transparency and integrity" seek to promote mechanisms, actions, guidelines and specific policies that aim to improve integrity environments and raise levels of transparency. For this, those initiatives aimed at developing *mechanisms to improve the transparency and integrity of purchasing, contracting and public works processes were considered a priority*. Within this framework, specific activities are developed that include measures, commitments and integrity agreements with suppliers.

In this line of work, we understand that the ENI must contemplate initiatives that develop mechanisms in the purchasing and contracting procedures for goods and services that promote respect for current regulations and the principles of transparency, publicity, legality and equality, taking into account the particularities and needs of the organism. The ENI Report that brings together these actions is available at: <https://www.argentina.gob.ar/noticias/planificacion-de-la-politica-de-integridad-del-poder-ejecutivo-national>.

Within this framework, the ENI incorporates more than 35 specific activities to promote integrity actions in the areas of purchasing and contracting in agencies, public companies and state entities of the National Public Administration. With regard to centralized administration, transformative proposals such as that of the Ministry of Public Works can be highlighted. This body includes as an initiative its Public Works Observatory. A space for institutional participation, where public and private universities, civil society organizations, business chambers and other actors linked to the process of contracting and executing public works, carry out specific initiatives aimed at strengthening transparency, integrity, efficiency, effectiveness and innovation in public works contracting, execution and monitoring systems. In addition, the Ministry of Economy contemplates as an activity the development of an electronic payment and control system for suppliers. The Ministry of Health, for its part, promotes a series of actions in terms of monitoring purchases and contracts and their distribution in the different provincial jurisdictions.

As far as decentralized jurisdictions are concerned, the National Procurement Office (ONC) of the Head of the Cabinet of Ministers seeks to strengthen transparency and integrity in the national public procurement and contracting system through a series of actions that improve processes, mechanisms, regulatory frameworks and that will provide new tools. In addition, the National Institute of Industrial Technology (INTI) within the framework of its integrity program promotes Integrity commitments that will be signed by all the actors involved in a

Purchasing and Contracting procedure and that will form part of the proceedings, and through which the parties assume the commitment to act with transparency, ethics and integrity, subject to the responsibilities established in each case. Also, the Federal Administration of Public Revenues (AFIP) develops in one of its activities the creation of a system of evaluation, control and integrity check of its suppliers. The National Administration of Social Security (ANSES), for its part, develops as an activity a registry of suppliers of purchases and contracts in the organism. The National Institute of Associations and Social Economy (INAES) proposes to implement an integrity plan in the purchasing and contracting processes; Come in

others.

As for companies with state participation, both SOFSE and ADIFSE contemplate activities to promote good integrity practices for suppliers in the framework of contracting. Aguas y Saneamientos Argentinos (AySA) develops through its integrity program various actions in terms of integrity and transparency for its purchasing and contracting areas. Likewise, Télam develops a digital portal for purchasing and contracting management for the entire company; among others.

It is worth clarifying that, in addition to these efforts, different organizations in the ENI provide for the registration to the RITE of the organizations they assist, suppliers of goods and services, as well as those entities that make up their value chain as contracting requirements. Among them, the Ministry of Health, INAES, Aerolíneas Argentinas and SOFSE stand out.

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**graphic report**

**Number:**

**Reference:** Response to Request for Access to Public Information - EX-2021-25636566--APN-OA#PTE

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# ANNEX 8: RESPONSE TO PUBLIC INFORMATION REQUEST IV

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**Number:**

**Referencia:** EX-2022-65600708--APN-OA#PTE

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**Of my highest consideration:**

According to what was reported by the UNDERSECRETARIAT FOR PLANNING TRANSPARENCY POLICIES of the Anticorruption Office, this body has been carrying out the initiative of the Registry of Integrity and Transparency for Companies and Entities of Argentina (RITE) aimed at creating, improving, strengthening and analyzing the integrity programs referred to in articles 22 and 23 of Law 27,401. Information regarding the initiative can be accessed on the website [rite.gob.ar](http://rite.gob.ar).

In any case, it should be noted that 4 important milestones have been achieved in the work plan aimed at implementing this Registry:

1. Approval of the registration forms on integrity and due diligence programs. These forms were prepared in work groups in which more than 80 professionals specialized in the subject participated and in which more than 500 comments and contributions were received, which were considered by the Anti-Corruption Office. The form referring to Integrity Programs is one of the fundamental elements of the RITE. This questionnaire contains questions about the policies carried out by the companies or entities that will allow visualizing the level of development of their integrity programs. This form will also make it possible to identify the necessary aspects to achieve improvements in them. In turn, the Due Diligence form has also been prepared, which was the result of the consensus reached in the more than 35 meetings held by the Anti-Corruption Office with actors from the private sector, civil society and academia. The answers of said

form, which will not impact the level of progress within the RITE, will allow access to information of interest at the time of making the contractual relationship.

2. Putting the RITE Portal online, a digital space with information, documents and resources to accompany organizations in the development of integrity programs, as a previous step to starting up the registry. The main section incorporated into the portal is the Tool Box, since it offers learning resources and guides on RITE with training material, videos, templates and model documents to accompany the strengthening of integrity actions by companies and entities. In addition, it presents the agreements signed with the universities that will contribute to the generation of new training materials. Another noteworthy aspect is that, after the publication of the resolution, the RITE Portal makes available the forms that will be contained in the registry, with the components and instances that those organizations that want to show their commitment to ethics and transparency must go through, to move towards the maturity of its Integrity Programs.

3. Organization of a face-to-face meeting that brought together more than 150 compliance professionals. During the meeting, which was held at the headquarters of the Professional Council of Economic Sciences of CABA, on Thursday, June 23, the progress of the registry was presented and there were two panels with references from the public, private and civil society sectors who discussed the collaborative experience in the design stage of the RITE and about the challenges and incentives to join the platform. In addition, between January 1, 2022 and June 30, 2022, the OA entered into 8 (eight) collaboration agreements for the promotion of RITE, these were with Aerolíneas Argentinas, Universidad del Aconcagua, Federal Administration of Public Revenues (AFIP), Universidad Siglo 21, National Institute of Associativism and Social Economy (INAES), the Mexican civil association Counselors in Integrity and Regulatory Compliance (CICN), University of Buenos Aires (UBA) and the Investment and Foreign Trade Bank (BICE).

4. Start-up of the RITE Simulator. Training platform for future adherents to the Registry.

For its part, in relation to the dissemination and awareness activities on RITE, work meetings and presentations were held at the Federal Cycle on Integrity in Ushuaia: corruption, gender and patriarchy, at the International Cooperation Meeting on International Integrity and Transparency, in the Meeting on integrity, gender and human rights organized by Women In Compliance Argentina, in the second meeting on the Opening of Competition organized by the Ministry of Public Works, in the Meeting of the Network of Integrity Areas and Links, in the province of Mendoza within the framework of the Federal Program for the Promotion of Integrity and Transparency Policies in Provinces and Municipalities, in a joint activity with the Ministry of Health, with the Leadership and Responsible Organizations Foundation (FLOR), in the Institute for Development Business of Argentina (IDEA) and with the Argentine Union of State Suppliers (UAPE). Regarding the dissemination and external communication of RITE, finally workshops were held with the Argentine Union of State Providers and simulator presentation activities with the German Chamber and the British Chamber.

It is also reported that two new digital media were created: the RITE Channel on YouTube and the most recent, the RITE Page on LinkedIn.

On the other hand, it should be noted that as part of the expansion of the components to be incorporated into the Registry of Integrity and Transparency of Companies and Entities (RITE) during the month of March, work began on the preparation of the questionnaires that will be incorporated into the platform, and that they will collect information on policies and commitments related to Human Rights and the environment adopted by companies. As in the first stage, the methodology for preparing the RITE questionnaires will be carried out collaboratively with various actors, both from the public sector, the private sector and civil society. Thus, during

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consultation and discussion spaces will be held during the process, with the aim of preparing a questionnaire that not only has the necessary consensus, but is also adapted to the reality of the users of the platform (Public Companies, SMEs, among others). Regarding the preparatory activities, a mapping of regulations is being carried out, both mandatory and voluntary, analyzing national, regional and international regulations, in order to have a complete understanding of the environmental and human rights commitments adopted, and how these make it possible to consolidate a path towards compliance with the 2030 Agenda. To date, more than eighty national and international regulations have been analyzed and meetings have been held with the Ministry of Gender and the Ministry of the Environment, references for companies (through Chambers and representative entities), International Organizations (CERALC Project of the United Nations) and specialists in topics related to compliance such as the Women in Compliance group, among other institutions and references.

THE OA has been working within the framework of the UNDP project, in the application of the RITE to different SDGs. Among them those that refer to gender equality, respect for human rights and care for the environment.

[https://www.argentina.gob.ar/sites/default/files/oa\\_report\\_de\\_gestion\\_semestral\\_2022\\_docx.pdf](https://www.argentina.gob.ar/sites/default/files/oa_report_de_gestion_semestral_2022_docx.pdf)

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# ANNEX 9: RESPONSE TO PUBLIC INFORMATION REQUEST V

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Proceedings	Description	file status	Condition	Covering date	Kind of Procedure	Distribution	reason for request
EX-2019-56977656-APN-QA#MJ	SISA 15765	Guard Temporary	Closed 08/16/2019 16:35:18	1/20/19 16:35:18	MJDH00201 - Intervention in matters of Transparency in purchases and contracts	QA#MJ - Office anti-corruption	POSSIBLE CONFLICT OF INTEREST BETWEEN THE COMPANY DIETRICH SA AND THE COMPANY ARMORALIT SA. SISA 15765
EX-2019-66040485-APN-QA#MJ	PPP Project "Renovation and Improvement of Bahía Blanca - Afíalo - Provinces of Buenos Aires, Rio Negro and Neuquén Roads". High Level Reporting Mechanism.	Guard Temporary	Closed 12/7/2019 16:39:12	7/20/19 16:39:12	MJDH00201 - Intervention in matters of Transparency in purchases and contracts	QA#MJ - Office anti-corruption	PPP Project "Renovation and Improvement of Bahía Blanca - Afíalo - Provinces of Buenos Aires, Rio Negro and Neuquén Roads". High Level Reporting Mechanism.
EX-2019-4087682-APN-QA#MJ	SISA 16042	Guard Temporary	Closed 01/22/2019 15:24:41	2/20/19 15:24:41	MJDH00201 - Intervention in matters of Transparency in purchases and contracts	QA#MJ - Office anti-corruption	WITHIN THE FRAMEWORK OF DECREE 202/2017 THE FIRM PC PUBLICIDAD PRESENTS ITS OFFER FOR THE PUBLIC BIDDING PROCEDURE N° 362-0015-LPU18 OF THE AABE FOR THE CONCESSION OF USE FOR THE COMMERCIAL EXPLOITATION OF 14 ADVERTISING SPACES, DECLARING THAT HIS REPRESENTATIVE IS MR JULIAN M ALVAREZ ECHAGUE WHO WOULD HAVE A SUPPOSED LINK WITH THE MR MINISTER OF TRANSPORT GUILLERMO JAVIER DIETRICH. SISA 16042
EX-2019-5692195-APN-QA#MJ	SISA 16202	Guard Temporary	Closed 02/3/2019 15:15:19	3/20/19 15:15:19	MJDH00201 - Intervention in matters of Transparency in purchases and contracts	QA#MJ - Anti-Corruption Office	WITHIN THE FRAMEWORK OF DEC 202 IN THE CONTRACTING PROCESS N° 61-0039-CDI18 THEY REPORT THE SWORN DECLARATION OF POSITIVE INTERESTS OF CIPPEC. SISA 16202
EX-2019-10449695-APN-QA#MJ	SISA 16262	Guard Temporary	Closed 02/20/2019 13:59:39	3/20/19 13:59:39	MJDH00201 - Intervention in matters of transparency in purchases and contracting	QA#MJ - Anti-Corruption Office	WITHIN THE FRAMEWORK OF DECREE 202/2017, THE ARGENTINE POST OFFICE PRESENTS THE SWORN DECLARATION OF POSITIVE INTERESTS OF THE COMPANY THE BOSTON CONSULTING GROUP SOUTH AMERICA LLC, SUC. ARGENTINA WHO IS REGISTERED IN THE MASTER OF SUPPLIERS. SISA 16262
EX-2019-14126020-APN-QA#MJ	SISA 16312	Guard Temporary	Closed 03/06/2019 17:14:20	3/20/19 17:14:20	MJDH00201 - Intervention in matters of transparency in purchases and contracts	QA#MJ - Office anti-corruption	WITHIN THE FRAMEWORK OF THE PRIVATE BIDDING N° 76-001-LPR18 THAT IS CARRIED OUT IN THE FOLLOW FOR THE CONTRACTING OF A FULL INTERNET CONNECTIVITY SERVICE OF 80 MBPS, PRESENT THE SWORN DECLARATION OF INTERESTS OF THE FIRM TELECOM ARGENTINA SA. SISA 16312
EX-2019-20810619-APN-QA#MJ	DEC. JURY OF INTERESTS Temporary	Guardianship	Closed 04/09/2019 17:07:28	4/20/19 17:07:28	MJDH00201 - Intervention in matters of transparency in purchases and contracting	QA#MJ - Anti-Corruption Office	REPORT SWORN DECLARATION OF INTERESTS - CIPPEC.
EX-2019-3671805-APN-QA#MJ	SISA 16417	Guard Temporary	Closed 04/7/2019 16:14:01	7/20/19 16:14:01	MJDH00201 - Intervention in matters of transparency in purchases and contracting	QA#MJ - Anti-Corruption Office	WITHIN THE FRAMEWORK OF DECREE 202/2017, THE RAILWAY OPERATOR SOCIEDAD DEL ESTADO PRESENTS THE POSITIVE SWORN DECLARATION OF INTERESTS OF THE COMPANY LOGYT SUDAMERICANA SA. SISA 16417
EX-2019-47901519-APN-QA#MJ	SISA 16532	Guard Temporary	Closed 05/30/2019 16:33:50	3/20/19 16:33:50	MJDH00201 - Intervention in matters of Transparency in purchases and contracts	QA#MJ - Office anti-corruption	WITHIN THE FRAMEWORK OF DECREE 202/2017 THE STATE MONEY COMPANY PRESENTS THE SWORN DECLARATION OF POSITIVE INTERESTS BY THE FIRM TITO GONZALEZ AUTOMOTORES SA. SISA 16532
EX-2019-47608290-APN-QA#MJ	SISA 16533	Guard Temporary	Closed 05/30/2019 16:45:34	3/20/19 16:45:34	MJDH00201 - Intervention in matters of Transparency in purchases and contracts	QA#MJ - Office anti-corruption	WITHIN THE FRAMEWORK OF DECREE 202/2017 THE STATE MONEY COMPANY PRESENTS THE SWORN DECLARATION OF POSITIVE INTERESTS BY THE FIRM DIETRICH SA. SISA 16533
EX-2019-5100575-APN-QA#MJ	SISA 16562	Guard Temporary	Closed 05/31/2019 12:05:10	31/20/19 12:05:10	MJDH00201 - Intervention in matters of transparency in purchases and contracting	QA#MJ - Anti-Corruption Office	BY APPLICATION OF DECREE 202/2017, THE AABE REPORTS THE RECEIPT OF THE SWORN DECLARATION OF INTERESTS OF CLUB ATLETICO BOCA JUNIORS ASSOCIATION CIVIL
EX-2019-54463819-APN-QA#MJ	SISA 16582	Guard Temporary	Closed 06/2/2019 16:25:33	2/20/19 16:25:33	MJDH00201 - Intervention in matters of transparency in purchases and contracting	QA#MJ - Anti-Corruption Office	REQUESTS APPROVAL OF THE SWORN DECLARATION OF INTERESTS FOR LEGAL PERSONS BY THE COMPANY AKZO NOBEL ARGENTINA SA. SISA 16582
EX-2019-56626652-APN-QA#MJ	SISA 16609	Guard Temporary	Closed 06/4/2019 16:19:27	4/20/19 16:19:27	MJDH00201 - Intervention in matters of transparency in purchases and contracting	QA#MJ - Anti-Corruption Office	WITHIN THE FRAMEWORK OF DECREE No. 202/2017, BANCO NACION PRESENTS POSITIVE SWORN DECLARATION OF INTERESTS OF THE COMPANY OMNIGRAPHICS ARGENTINA SA.
EX-2019-65222013-APN-QA#MJ	SISA 16674	Guard Temporary	Closed 07/8/2019 16:27:48	8/20/19 16:27:48	MJDH00201 - Intervention in matters of transparency in purchases and contracts	QA#MJ - Office anti-corruption	WITHIN THE FRAMEWORK OF DECREE 202/2017 THE COMPANY NEXO ENERGIA SA PRESENTS THE SWORN DECLARATION OF POSITIVE INTERESTS TO PRESENT YOUR LUNLUNTA SMALL HYDROELECTRIC USE PROJECT (NATIONAL AND INTERNATIONAL OPEN CALL FOR CONTRACTING IN THE WHOLESALE ELECTRICITY MARKET (MEM) OF ELECTRICAL ENERGY FROM RENEWABLE GENERATION SOURCES - THE RENEW PROGRAM - ROUND 3). SISA 16674

Proceedings	Description	file status	Condition	Covering date	Kind of Procedure	Distribution	reason for request
EX-2019-88430661-APN-QA#MJ	SISA 16723	Guard Temporary	Closed	07/30/2019 13:44:25	NJDH00201 - Intervention in matters of Transparency in purchases and contracts	OAR#MJ - Office anti-corruption	WITHIN THE FRAMEWORK OF DECREE 202/2017 THE RAILWAY OPERATOR SOCIEDAD DEL STATE (SOFSE) PRESENTS THE POSITIVE SWORN DECLARATION OF INTERESTS OF THE FIRM OMNIGRAPHICS COMMERCIAL ARGENTINA SA. SISA 16723
EX-2019-68809611-APN-QA#MJ	SISA 16728	Guard Temporary	Closed	31/07/2019 16:22:00	NJDH00201 - Intervention in matters of Transparency in purchases and contracts	OAR#MJ - Office anti-corruption	WITHIN THE FRAMEWORK OF DECREE 202/2017, ANSES PRESENTS THE SWORN STATEMENT OF POSITIVE INTERESTS OF THE FIRM OMNIGRAPHICS COMMERCIAL ARGENTINA SA IN THE PURCHASE PROCESS. AR N°03-0046-LPU18. SISA 16728
EX-2019-75571057-APN-QA#MJ	SISA 16610	Guard Temporary	Closed	08/22/2019 15:50:14	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OAR#MJ - Anti-Corruption Office	ONC REQUESTS TO PROMOTE MODIFICATION OF ARTICLE 3 OF DECREE 202/2017, REFERRED TO THE DATE OF PRESENTATION OF SWORN STATEMENTS ANNUAL INTEREST BEFORE THE REGISTRIES ADMINISTERED BY SAID ORGANISM. SISA 16610
EX-2019-78558694-APN-QA#MJ	SISA 17000	Guard Temporary	Closed	08/30/2019 16:20:34	NJDH00201 - Intervention in matters of Transparency in purchases and contracts	OAR#MJ - Office anti-corruption	WITHIN THE FRAMEWORK OF DECREE 202/2017 BY WHICH THE CONTRACTING IS PROCESSED DIRECT FOR THE 'HIGH-SPEED INTERNET SERVICE FOR AFIP CENTRAL BUILDINGS' THE CONTRACT AWARDS AND EXECUTION DEPARTMENT OF THE PURCHASING DIRECTION OF THIS FEDERAL ADMINISTRATION OF THE AFIP, SEND THE POSITIVE DJ OF INTERESTS OF THE PROVIDER TELECOM ARGENTINA SA, SISA 17000
EX-2019-78580784-APN-QA#MJ	SISA 17001	Guard Temporary	Closed	08/30/2019 17:04:13	NJDH00201 - Intervention in matters of Transparency in purchases and contracts	OAR#MJ - Anti-Corruption Office	WITHIN THE FRAMEWORK OF DECREE 202/17 BY WHICH A CONTRACTING IS PROCESSED DIRECT FOR THE 'SERVICE OF PRINTING AND INSTALLATION OF PLOTTED VINYL' THE AREA OF THE PURCHASING DIRECTION OF THE AFIP PRESENTS THE DJ OF INTERESTS POSITIVE OF THE SUPPLIER OMNIGRAPHICS COMMERCIAL ARGENTINA SA. SISA 17001
EX-2019-81769930-APN-QA#MJ	SISA 17093	Guard Temporary	Closed	09/02/2019 13:51:50	NJDH00201 - Intervention in matters of Transparency in purchases and contracts	OAR#MJ - Office anti-corruption	COMMUNICATE DDJJ 202/17 IN THE FRAMEWORK OF THE PROCESS OF PURCHASING N° 63-0018-LPU19-CARRIED OUT BY THE ANSES FOR THE CONTRACTING OF AN SMS SERVICE. ARMHOLE 17093
EX-2019-84970402-APN-QA#MJ	SISA 17177	Guard Temporary	Closed	09/09/2019 13:47:48	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OAR#MJ - Anti-Corruption Office	WITHIN THE FRAMEWORK OF DEC 202 IN RELATION TO A CONTRACTING PROCESS FOR A CONSULTING SERVICE EVALUATION OF PROGRAMS ORIENTED TO THE PROTECTION OF CHILDREN IN THE PROVINCE OF BUENOS AIRES', THE MSYDS SEND A QUESTION REFERRED TO THE APPLICATION OF ART. 4. SISA 17177
EX-2019-89095559-APN-QA#MJ	SISA 17291	Processing Open	09/30/2019	16:50:13	NJDH00201 - Intervention in matters of Transparency in purchases and contracts	OAR#MJ - Office anti-corruption	WITHIN THE FRAMEWORK OF DEC 202/17 OF DIRECT CONTRACTING FOR "THE SERVICE OF HIGH-SPEED INTERNET FOR AFIP CENTRAL BUILDINGS, THE FEDERAL PUBLIC REVENUE ADMINISTRATION PRESENTS THE POSITIVE SWORN DECLARATION OF INTERESTS OF THE PROVIDER TELECOM ARGENTINA SA. SISA 17291
EX-2019-103815641-APN-QA#MJ	SISA 17536	Guard Temporary	Closed	11/21/2019 14:52:25	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OAR#MJ - Anti-Corruption Office	SENDS DDJJ FROM MR. KENNY MARIO IN ORDER TO CONSULT ABOUT AN ALLEGED CONFLICT OF INTEREST IN THE FRAMEWORK OF DECREE 202/2017
EX-2019-105875699-APN-QA#MJ	SISA 17541	Processing Open	29/11/2019	13:07:37	NJDH00201 - Intervention in matters of Transparency in purchases and contracts	OAR#MJ - Office anti-corruption	WITHIN THE FRAMEWORK OF DECREE 202/17, THE AGENCY FOR THE ADMINISTRATION OF ASSETS OF THE STATE (AABE) PRESENTS THE POSITIVE SWORN DECLARATION OF INTERESTS OF THE COMPANY ENERSITE SA. SISA 17541
EX-2019-106262349-APN-QA#MJ	SISA 17544	Guard Temporary	Closed	11/29/2019 12:35:13	NJDH00201 - Intervention in matters of Transparency in purchases and contracts	OAR#MJ - Anti-Corruption Office	WITHIN THE FRAMEWORK OF DECREE 202/2017, THE COMPANY AYSA PRESENTS THE POSITIVE SWORN DECLARATION OF INTERESTS OF THE SUPPLIER 'UNIVERSIDAD SAN ANDRES'. ARMHOLE 17544
EX-2019-106310029-APN-QA#MJ	SISA 17546	Guard Temporary	Closed	11/29/2019 14:04:06	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OAR#MJ - Anti-Corruption Office	WITHIN THE FRAMEWORK OF DECREE 202/2017 AND UNDER THE PURCHASE PROCESS N° 50228 THE COMPANY AYSA PRESENTS THE POSITIVE SWORN DECLARATION OF INTERESTS OF THE COMPANY 'UNIVERSIDAD DE SAN ANDRES'. SISA 17546
EX-2019-109618293-APN-QA#MJ	SISA 17568	Guard Temporary	Closed	12/11/2019 14:47:34	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OAR#MJ - Anti-Corruption Office	WITHIN THE FRAMEWORK OF DEC 202/2017 IN THE DIRECT CONTRACTING PROCEDURE N° 362-0055-CD19, THE AABE PRESENTS THE POSITIVE SWORN DECLARATIONS OF INTEREST OF THE ENTITY TENIS CLUB ARGENTINO CIVIL ASSOCIATION. SISA 17568
EX-2020-200026-APN-CA#PTE	SISA 17623	Guard Temporary	Closed	02/01/2020 12:59:24	NJDH00201 - Intervention in matters of Transparency in purchases and contracts	OAR#PTE - Office anti-corruption	UNDER THE FRAMEWORK OF DECREE 202/17 THE RAILWAY OPERATOR SE (SOFSE) PRESENTS THE DJ OF POSITIVE INTERESTS OF THE FIRM SIEMENS MOBILITY SA
EX-2020-6191620-APN-QA#PTE	SISA 17687	Guard Temporary	Closed	01/28/2020 15:45:46	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OAR#PTE - anti-corruption office	SOFSE NOTIFIES DJPI PRESENTED BY SIEMENS MOBILITY IN THE FRAMEWORK OF THE NATIONAL AND INTERNATIONAL SHORT TENDER FOR THE ACQUISITION OF EQUIPMENT FOR PAN AND ATS INSTALLATIONS. SISA 17687

Proceedings	Description	file status	Condition	Covering date	Kind of Procedure	Distribution	reason for request
EX-2020-7502797-APN-OA#PTE	SISA 17696	Guard Temporary	Closed (27)	9/2020 15:37:22	MJDH00201 - Intervention in matters of Transparency in purchases and contracts	QA#PTE - anti-corruption office	WITHIN THE FRAMEWORK OF DECREE 2020/17 IN THE PROCESS OF COMPR.AR 65-0027-LPU16, FOR THE PROVISION AND INSTALLATION OF TELECOMMUNICATIONS LINKS AND ASSOCIATED ELEMENTS, SUBMIT THE SWORN DECLARATION OF INTERESTS OF THE TELECOM COMPANY. SISA 17696
EX-2020-8059248-APN-OA#PTE	SISA 17705	Guard Temporary	Closed (27)	9/2020 12:29:27	MJDH00201 - Intervention in matters of transparency in purchases and contracting	QA#PTE - anti-corruption office	WITHIN THE FRAMEWORK OF DECREE 202/2017, THE RAILWAY OPERATOR, SOCIEDAD DEL ESTADO (SOFSE), COMMUNICATES THE SWORN DECLARATION OF INTERESTS PRESENTED BY THE FIRM SIEMENS MOBILITY SA. SISA 17705
EX-2020-10364670-APN-OA#PTE	SISA 17721	Guard Temporary	Closed (27)	4/2020 12:56:01	MJDH00201 - Intervention in matters of transparency in purchases and contracting	QA#PTE - anti-corruption office	WITHIN THE FRAMEWORK OF DECREE 202/2017 IN THE PROCESS OF BUYING 63-0018-LPU16 - HIRING OF AN SMS SERVICE, ANSES PRESENTS THE TELECOM DDJJ. SISA 17721
EX-2020-37482268-APN-OA#PTE	SISA OA 17838	Guard Temporary	Closed (04)	9/2020 18:23:46	MJDH00201 - Intervention in matters of Transparency in purchases and contracts	QA#PTE - anti-corruption office	NATIONAL BANK OF GENETIC DATA REQUESTS INDICATIONS REGARDING APPLICATION OF DECREE 202/17
EX-2020-36946761-APN-OA#PTE	oa	Guard Temporary	Closed (07)	8/2020 8:11:09	MJDH00201 - Intervention in matters of Transparency in purchases and contracts	QA#PTE - Office anti-corruption	Consultation of the OFFICIAL MAIL OF THE ARGENTINE REPUBLIC SA, in accordance with the provisions of Decree No. 202/17.
EX-2020-68141650-APN-OA#PTE	SISA OA 18044	Guard Temporary	Closed (09)	9/2020 11:21:57	MJDH00201 - Intervention in matters of Transparency in purchases and contracts	QA#PTE - Office anti-corruption	PRIVATE BIDDING N° 33-0040-LPR20 CARRIED OUT FOR THE CONTRACTING OF INSTALLATION WORK, PROVISION OF EQUIPMENT, START-UP OPERATION AND MAINTENANCE OF 3 DIGITAL LINKS FOR TRANSMISSION DATA, LAN TO LAN OF 100 MBPS, LINKING COMPUTER EQUIPMENT, FROM THE MINISTRY OF LABOR, EMPLOYMENT AND SOCIAL SECURITY
EX-2020-75889140-APN-OA#PTE	SISA 18073	Guard Temporary	Closed (06)	9/2020 10:43:57	MJDH00201 - Intervention in matters of transparency in purchases and contracting	QA#PTE - anti-corruption office	PUBLIC TENDER CONSULTATION N° 538 - FILE N° 31067 - DATA TRANSMISSION SERVICE AND INTERNET LINKS - FIRM TELECOM ARGENTINA SA
EX-2020-76907532-APN-OA#PTE	SISA OA 18080	Processing Open	10/11/2020	11:55:56	MJDH00201 - Intervention in matters of Transparency in purchases and contracts	QA#PTE - anti-corruption office	IT IS RAISED IN CONSULTATION TO THE ANTI-CORRUPTION OFFICE -IN ITS CHARACTER OF ENFORCEMENT AUTHORITY OF DECREE N° 202/17- TO ISSUE AN OPINION REGARDING HOW TO PROCEED IN THOSE PROCEDURES OF CONTRACTS IN WHICH THE OFFEROR IS A SUCCESSION
EX-2020-77162354-APN-OA#PTE	SISA OA 18082	Guard Temporary	Closed (10)	9/2020 22:38:52	MJDH00201 - Intervention in matters of transparency in purchases and contracting	QA#PTE - anti-corruption office	INQUIRY WITHIN THE FRAMEWORK OF THE PRIVATE TENDER N° 33-0036-LPR20 CARRIED OUT FOR THE CONTRACTING OF THE REDUNDANCY OF THE FULL INTERNET ACCESS SERVICE, WITH THE INSTALLATION WORKS, EQUIPMENT PROVISION, COMMISSIONING AND MAINTENANCE OF A LINK OF 300 MBPS., FOR THE MINISTRY OF LABOR, EMPLOYMENT AND SOCIAL SECURITY.
EX-2020-79222839-APN-OA#PTE	SISA OA 18090	Processing Open	11/17/2020	9:20:42	MJDH00201 - Intervention in matters of transparency in purchases and contracting	QA#PTE - anti-corruption office	DECREE 202/2017 BIDDER TELECOM ARGENTINA SA IN THE BIDDING PROCESS 84/26-1323-LPR20, EX-2020-52060797--APN-HMC#EA - DECLARATION OF RELATIONSHIP WITH OFFICIAL AND INQUIRY FOR POSSIBLE RELATIONSHIP OF HMC DIRECTOR
EX-2020-79571879-APN-OA#PTE	SISA OA 18096	Processing Open	11/18/2020	9:43:16	MJDH00201 - Intervention in matters of Transparency in purchases and contracts	QA#PTE - Office anti-corruption	DECREE No. 202/17- TO ISSUE AN OPINION REGARDING HOW TO PROCEED IN THOSE PROCEDURES OF CONTRACT IN WHICH THE OFFEROR IS A CONDOMINIUM, SPECIFICALLY, IF IT IS APPROPRIATE TO REQUEST THE SWORN DECLARATION OF INTERESTS FROM THE OWNERS OF THE SAME.
EX-2020-80501035-APN-OA#PTE	SISA OA 18098	Guard Temporary	Closed (10)	9/2020 12:32:56	MJDH00201 - Intervention in matters of Transparency in purchases and contracts	QA#PTE - Office anti-corruption	CONSULTATION WITHIN THE FRAMEWORK OF DECREE 202/17 - COMPR.AR PROCESS 55-0007-CDI20- POSTAL SERVICE TO THE WHOLE NATIONAL TERRITORY OFFICIAL MAIL OF THE ARGENTINE REPUBLIC - ENARGAS
EX-2020-82989156-APN-OA#PTE	SISA 18108	Processing Open	11/30/2020	15:26:38	MJDH00201 - Intervention in matters of transparency in purchases and contracting	QA#PTE - Office anti-corruption	PROCESS N° 834-0011-CDI20 - DIRECT INTER-ADMINISTRATIVE CONTRACTING WITH THE OFFICIAL MAIL OF THE ARGENTINE REPUBLIC SA, CARRIED OUT BY THE MINISTRY OF AGRICULTURE, LIVESTOCK AND FISHERIES, SWORN STATEMENT OF INTERESTS PRESENTED BY MENTIONED COMPANY IN RELATION TO MR. GIUSEPPUCCI, MAXIMILIAN, DNI 782.782.778

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EX-2020-84132117-APN-OA#PTE	SISA OA 18113	Processing Open		03/12/2020 11:24:31	NJDH00201 - Intervention in matters of Transparency in purchases and contracts	OA#PTE - anti-corruption office	SOFSE - ACQUISITION OF ACTIVE SIGNALING ELEMENTS. SIEMENS MOBILITY SA, SWORN STATEMENT OF POSITIVE INTEREST - MR. MIGUEL CAFIERO HAS A LINK TO DECLARE IN THE TERMS OF ARTICLE 1 AND 2
EX-2020-84141772-APN-OA#PTE	SISA 18114	Guard Temporary	Closed C3/	2/2020 11:42:00	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OA#PTE - anti-corruption office	SOFSE - ACQUISITION OF SIGNALING ELEMENTS. SIEMENS MOBILITY SA, SWORN STATEMENT OF POSITIVE INTEREST - MR. MIGUEL CAFIERO HAS A LINK TO DECLARE IN THE TERMS OF ARTICLE 1 AND 2
EX-2020-85781449-APN-OA#PTE	SISA 18121	Guard Temporary	Closed I2/	9/2020 12:19:57	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OA#PTE - anti-corruption office	Officials included in the assumptions of linkage of Decree 202/17 that make up the Board of directors of a public limited company at the proposal of the Sustainability Guarantee Fund of ANSES
EX-2021-8540859-APN-OA#PTE	EN 83/21 SISA 18165	Processing Open		01/21/2021 2:31:24	NJDH00201 - Intervention in matters of Transparency in purchases and contracts	OA#PTE - anti-corruption office	WITHIN THE FRAMEWORK OF WHAT IS ESTABLISHED IN DECREE No. 202/2017 AND IN RELATION TO THE FILE EX-2019-69706161 - APNGOWSOFSE, PROCESSING THE SECOND CALL FOR DIRECT CONTRACTING BY ABBREVIATED ATTORNEY N° 26/2020 FOR THE "PROVISION OF COMPONENTS FOR TRACK CIRCUITS - ROCA GENERAL LINE", IS REQUESTED THE OA PLEASE PUBLICIZE THE FILE. ATTACHED SWORN DECLARATION OF INTERESTS OF SIEMENS MOBILITY SA.
EX-2021-8471797-APN-OA#PTE	SISA 18169 EN 66/21	Processing Open		01/29/2021 12:06	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OA#PTE - anti-corruption office	WITHIN THE FRAMEWORK OF DECREE No. 202/2017, IN RELATION TO THE EX-2020 FILE-01367940- APNGOWSOFSE , BY WHICH THE ACQUISITION OF MATERIALS FOR AUTOMATIC BREAD LGR.
EX-2021-8707431-APN-OA#PTE	SISA 18183	Processing Open		03/03/2021 4:03:48	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OA#PTE - anti-corruption office	WITHIN THE FRAMEWORK OF DECREE 202/17 AND IN RELATION TO FILE EX-2020-91389112 - APNGOWSOFSE FOR WHICH THE ACQUISITION OF SPARE PARTS IS BEING MANAGED SIEMENS42000-40X, THE RAILWAY OPERATOR STATE COMPANY SOFSE COMMUNICATES THE SWORN DECLARATION OF INTEREST PRESENTED BY SIEMENS MOBILITY SA SISA 18183
EX-2021-11488883-APN-OA#PTE	SISA 18194 EN 174/21	Processing Open		02/09/2021 7:35:29	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OA#PTE - anti-corruption office	WITHIN THE FRAMEWORK OF DECREE No. 202/2017, IN RELATION TO THE EX-2021 FILE-04749017- APNGOWSOFSE FOR WHICH THE ACQUISITION OF SPARE PARTS IS BEING MANAGED. ATTACHED SWORN DECLARATION OF INTERESTS OF SIEMENS.
EX-2021-16802711-APN-OA#PTE	EN: 230/21 SISA 18215	Processing Open		02/23/2021 16:44:03	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OA#PTE - Office anti-corruption	WITHIN THE FRAMEWORK OF DECREE No. 202/2017, IN RELATION TO THE EX-2021 FILE-10311036-APN-GCOWSOFSE BY WHICH THE ACQUISITION OF SIEMENS SPARE PARTS ATTACHED SWORN DECLARATION OF INTERESTS OF SIEMENS MOBILITY S.A.
EX-2021-18220194-APN-OA#PTE	EN 283/21 SISA 18228	Processing Open		03/04/2021 8:43:28	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OA#PTE - anti-corruption office	WITHIN THE FRAMEWORK OF DECREE 202/17 AND IN RELATION TO FILE EX-2021-12948756 - APN-GCOWSOFSE THROUGH WHICH THE ACQUISITION OF BARRIER SPARE PARTS IS MANAGED, A SWORN DECLARATION OF INTERESTS OF SIEMENS MOBILITY SA IS ATTACHED.
EX-2021-30400111-APN-OA#PTE	SISA 18264 NE: 429/21	Processing Open		04/08/2021 10:00:54	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OA#PTE - anti-corruption office	WITHIN THE FRAMEWORK OF DECREE 202/17, THE CONTRACTING CARRIED OUT UNDER THE IEASA PURCHASING AND CONTRACTING MANUAL REGARDING MR. GENERAL DEPUTY MANAGER, LIC. SEBASTIAN BONETTO IN ORDER TO INFORM THE PRESENTATION OF HIS DDJJ.
EX-2021-31876411-APN-OA#PTE	armhole 18288	Guard Temporary	Closed C4/	3/2021 12:10:05	NJDH00201 - Intervention in matters of Transparency in purchases and contracts	OA#PTE - anti-corruption office	IEASA ISSUES NOTIFICATION SWORN DECLARATION OF INTERESTS - ART. 4 INC. A) DECREE No. 202/17 - HIRING OF DR. GUSTAVO DAMIAN DELBON
EX-2021-31882446-APN-OA#PTE	armhole 18289	Processing Open		04/13/2021 12:18:59	NJDH00201 - Intervention in matters of transparency in purchases and contracts	OA#PTE - Office anti-corruption	NATIONAL DISABILITY AGENCY REPORTS AND COMPLIES WITH THE PROVIDED IN ARTICLE 4, INC. A., OF DECREE No. 202/17 - PROCESS COMPRAR 483-0014-CDI20 - EX-2020-55977012 - APN-CCYCANBAND
EX-2021-32285703-APN-OA#PTE	SISA 18272 EN 471/21	Processing Open		04/14/2021 11:46:38	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OA#PTE - Office anti-corruption	"OFFICIAL MAIL OF THE ARGENTINE REPUBLIC SA CHECK SCOPE OF DECREE 202/2017 ON INTER-ADMINISTRATIVE CONTRACTS".
EX-2021-70068805-APN-OA#PTE	SISA 18393	Processing Open		08/03/2021 9:05:43	NJDH00201 - Intervention in matters of transparency in purchases and contracting	OA#PTE - anti-corruption office	WITHIN THE FRAMEWORK OF DEC 202/17, SOFSE PRESENTS THE POSITIVE SWORN DECLARATION OF INTERESTS OF THE COMPANY BESNA SA, SISA 18393

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EX-2021-76863832-APN-OA#PTE	SISA 18414 EN 1062/21	Initiation	Open	08/20/2021 18:21:05	WJDH00201 - Intervention in matters of Transparency in purchases and contracts	OA#PTE - anti- corruption office	Decree 202/17, CNEA requests the appointment of a special supervisor in the framework of the contracting procedure for a transfer service for National Gendarme personnel to the Bariloche Atomic Center (EX-2021-18892590- -APN-GAEN#CNEA - COMPR.AR, No. 14/3 -0060-LPR21), CNEA Note NO-2021-74006306-APN-GAYF#CNEA.
EX-2021-87028382-APN-OA#PTE	SISA 18446	Processing Open	Open	15/2/2021	WJDH00201 - Intervention in matters of	OA#PTE -	WITHIN THE FRAMEWORK OF DECREE No. 202/2017 IN RELATION TO EX-2021-77837530-APN-GCO#SOESE

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EX-2022-12238413-APN-OA#PTE OVERS	IGHT REQUESTED BY THE MINISTRY OF SECURITY OF THE NATION BY VARIOUS ACQUISITIONS MADE WITH THE MINISTRY OF DEFENSE OF THE STATE OF ISRAEL	Processing Open	2/08/2022	14:46:25	MJDH00201 - Intervention in matters of Transparency in purchases and contracts	OA#PTE - anti-corruption office	OVERSIGHT REQUESTED BY THE MINISTRY OF SECURITY OF THE NATION BY VARIOUS ACQUISITIONS MADE WITH THE STATE MINISTRY OF DEFENSE FROM ISRAEL

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