

# COMPLIANCE ALERT

## CREATION OF COMPLIANCE INTEGRITY LIST

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ABOGADOS

# Creation of Compliance Integrity List

On 16 January 2025, the Ministry of Justice and Institutional Transparency (“MoJ”), approved the “Regulation of the Integrity List for the Implementation of Compliance” (“Regulation”), Ministerial Resolution No. 008/2025 (“RM 08”).

## What is the Integrity List?

The Integrity List (the “List”) will reflect private sector entities that implement internal compliance components.

The purpose the List is to provide greater visibility, enhance trust, and improve business reputations.

The List will be prepared, published, and updated every two years by the MoJ through the Vice Ministry of Institutional Transparency and Anti-Corruption (“Vice Ministry”).

The compliance components subject to evaluation will be:

No.	Component	Description
1	Commitment	<ul style="list-style-type: none"> <li>- Objectives – Mission – Vision.</li> <li>- Declaration of Anti-Corruption Principles, or a similar document.</li> <li>- Implementation of Compliance Policies.</li> </ul>
2	Training	<ul style="list-style-type: none"> <li>- Ethics and corporate integrity training.</li> <li>- Internal communication of Compliance policies.</li> </ul>
3	Code of Ethics	<ul style="list-style-type: none"> <li>- Code of Ethics or a similar regulation.</li> <li>- Internal regulations or similar standards.</li> <li>- Code of Conduct or a similar standard.</li> </ul>
4	Risk Management	<ul style="list-style-type: none"> <li>- Identification of risk areas.</li> <li>- Risk control mechanisms.</li> <li>- Procedures to identify conflicts of interest.</li> </ul>
5	Reporting and Investigation Mechanisms	<ul style="list-style-type: none"> <li>- Implemented whistleblowing channel.</li> <li>- Implemented Compliance Officer.</li> <li>- Due diligence, monitoring of reported cases.</li> </ul>
6	Continuous Improvement	<ul style="list-style-type: none"> <li>- Internal and external audits conducted.</li> <li>- Evaluations performed.</li> <li>- Verification of established internal procedures.</li> </ul>

## How to become part of the List?

### Call for Applications and Submission

The Vice Ministry will call for applications from entities in the following sectors:

- Agriculture
- Commerce
- Construction
- Pharmaceuticals
- Finance
- Hydrocarbons And Energy
- Industrial
- Manufacturing
- Mining
- Telecommunications.

Additionally, the call may include law firms, accounting firms, and the real estate sector. Other sectors not explicitly listed may also participate.

There will be three categories for applications, with classification criteria determined by the Evaluation Commission (described below).

Applications must be submitted both physically and digitally, including company details and documentation demonstrating the effective implementation of compliance components.

### Evaluation of documentation

Applications will be evaluated by an Evaluation Commission consisting of three members representing intergovernmental organizations, international organizations, and public or private entities related to transparency and integrity in the business sector.

The Evaluation Commission will (a) assess the degree of implementation of compliance components based on effectiveness indicators established in the Regulation and (b) issue a report recommending the inclusion of private entities in the List, which will be published in the Vice Ministry's Citizen Transparency Observatory.

## What are the benefits of being on the List?

In accordance with the Regulation, the Vice Ministry will issue a Recognition Certificate to the three private entities with the highest level of implementation.

The certificates may be awarded at a public and formal event, where some companies may also receive a "Special Mention". The criteria for granting this mention have not yet been established.

## About PPO

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PPO is the law firm with the widest geographical coverage in Bolivia, with offices in five cities: La Paz, Cochabamba, Santa Cruz, Sucre, and Cobija.

If you have any questions or require further information, please contact our Compliance professionals.

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