



TRACE | *certification*

The Due Diligence Standard

Due Diligence Report

What Does it Mean to be TRACE Certified?

It means that an individual or company has completed a comprehensive due diligence process administered by TRACE, the world's leading anti-bribery standard setting organization. Certification by TRACE signifies that an entity has completed internationally accepted due diligence procedures and has been forthcoming and cooperative during the review process. The successful completion of TRACE*certification* demonstrates a commitment to commercial transparency, allowing the certified entity to serve as a valued business partner to multinational companies.

TRACE*certification* Report at a Glance

- › Detailed company information, including information on subsidiaries and affiliated entities.
- › Business registrations, as applicable.
- › Corporate literature or a company description.
- › Beneficial ownership (except for shareholders owning less than 5% of publicly-traded companies).
- › Identification of directors and key employees.
- › Additional ownerships, directorships and employment of all owners, directors and key employees.
- › Current government employment of owners, directors and key employees.
- › Contact information for three business references.
- › One financial reference or audited financial statement.
- › Media and litigation searches dating back seven years in a comprehensive international database.
- › Denied party screening and two negative media searches.
- › Evidence of anti-bribery code of conduct and training.

Advantages of being TRACE Certified

- › Gain a valuable compliance credential that differentiates you from competitors and is widely recognized in the international business community.
- › Receive a copy of your verified due diligence report to share with an unlimited number of existing and prospective business partners.
- › Include your name, or company's name, in the TRACE Intermediary Directory, a publicly searchable database of potential business partners for multinational companies.
- › Train up to 40 employees using TRACE's multilingual online training modules including: Anti-Bribery Compliance, Avoiding Trafficked Labor, Conflicts of Interest and Conflict Minerals.
- › Display the TRACE logo in your marketing materials and on your website to showcase your commitment to transparency and supply chain integrity.
- › Attend TRACE Anti-Bribery Workshops at no cost.

TRACEcertification is not a guarantee against past or potential wrongdoing by the certified entity or a guarantee against potential liability. A summary of any "red flags" identified during the TRACEcertification review will be included in the report, but not all red flags preclude TRACEcertification.

About TRACE

TRACE International and TRACE Incorporated are two distinct entities with a common mission to advance commercial transparency worldwide by supporting the compliance efforts of multinational companies and their third party intermediaries. TRACE International is a non-profit business association that pools resources to provide members with anti-bribery compliance support while TRACE Incorporated offers both members and non-members customizable risk-based due diligence, anti-bribery training and advisory services. Working alongside one another, TRACE International and TRACE Incorporated offer an end-to-end, cost-effective and innovative solution for anti-bribery and third party compliance.

For more information, visit www.TRACEinternational.org.

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Parrocha Assessoria, Consultoria e Logistica Ltda certifies that the information provided in the following report is, to the best of its knowledge and belief, accurate, current and complete.

Parrocha Assessoria, Consultoria e Logistica Ltda certifies that to the best of its knowledge, neither Parrocha Assessoria, Consultoria e Logistica Ltda nor any of its employees or third parties acting on its behalf have offered or given anything of value to a government official in order to obtain or retain business or receive an improper business advantage.

Parrocha Assessoria, Consultoria e Logistica Ltda agrees to notify TRACE promptly of any material changes to the information provided herein.

The person whose signature appears below is authorized to certify on behalf of Parrocha Assessoria, Consultoria e Logistica Ltda that the information is true and correct.

Name: Marcelo Paez Rocha
Date: 28 January 2020



Due Diligence Summary

The **TRACE** due diligence review of commercial intermediaries is thorough. The review may nevertheless fail to uncover information which, if available, would have discouraged or prevented companies from entering into a business relationship with the intermediary. Companies requesting **TRACE** Reports agree that in no event shall **TRACE** be liable for any damages incurred as a result of relying on **TRACE** Reports or as a result of any omission or misrepresentation by an intermediary reviewed by **TRACE**.

This report contains personal information about individuals that is subject to strict legal protections under applicable data protection laws. You may only review this report or such personal information if you are appropriately authorized and have a need to know, to access or to otherwise process such information. This report is for the internal use of the requesting company only; it may not be sold or transferred in whole or in part. You must exercise due care in safeguarding this information and take all necessary steps to prevent any loss, theft, corruption or release of this information to unauthorized persons. If you have any questions or concerns regarding these obligations, contact TRACE's Data Protection Officer at DPO@traceinternational.org.

Parrocha Assessoria, Consultoria e Logística Ltda
TRACEcertification ID: TC4134-4598

15 October 2019 - 14 October 2020

Due diligence is not a guarantee against past or potential wrongdoing or against potential liability.

Depending on the nature, size, scope and location of the proposed project with an intermediary, more extensive due diligence may be warranted.

The following "red flags" or significant areas of concern were identified during the due diligence review:

-  Disclosed intention to work with a third party intermediary
See Associated Offices & Entities.
-



Due diligence undertaken by TRACE International or TRACE Inc. shall not be used to support or promote business in Iran or other sanctioned countries.



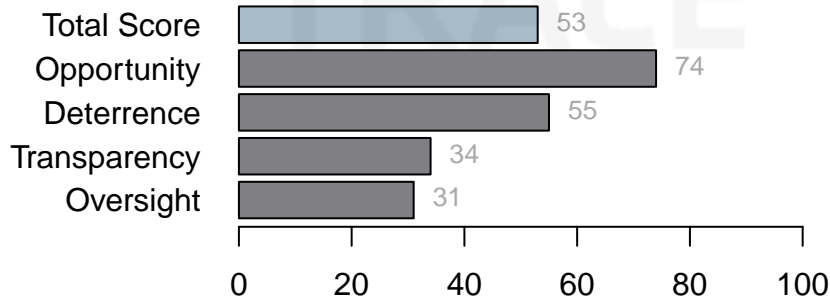
Brazil

Overall Risk Score: 53

Risk Level: medium

This score is a composite of the four domain scores discussed below, which are weighted and combined to produce the overall country risk score. Each country is given a score from 1 to 100 for each domain and for the total bribery risk. A higher score indicates a higher risk of business bribery. Assessments of whether a given domain score is “good” or “poor” are made relative to all other jurisdictions within that domain.

- 1. Business Interactions with Government:** Brazil receives a poor score of 74 in this domain, based on a high degree of government interaction, a medium expectation of bribes, and a high regulatory burden.
- 2. Anti-bribery Deterrence and Enforcement:** Brazil receives a poor score of 55 in this domain, based on a low quality of anti-bribery dissuasion and a medium quality of anti-bribery enforcement.
- 3. Government and Civil Service Transparency:** Brazil receives a good score of 34 in this domain, based on good governmental transparency and good transparency of financial interests.
- 4. Capacity for Civil Society Oversight:** Brazil receives a good score of 31 in this domain, based on a high degree of media freedom/quality and a medium degree of civil society engagement.



TRACE Bribery Risk Typology: Democracy with complex economy

This group generally consists of stable, democratic states with complex, diverse economies and fair-to-weak civil societies.

Comparable Jurisdictions	Matrix Scores
Hungary	52
Philippines	54
Serbia	54

Learn more about the TRACE Bribery Risk Matrix and Bribery Risk Typology at matrixbrowser.TRACEinternational.org



Business Information

Company's Full Legal Name: *Parrocha Assessoria, Consultoria e Logistica Ltda*

Doing Business As Name or Trade/Marketing Name: *Parrocha Logistica Aduaneira*

Address of Headquarters/
Principal Place of Business: *Rua Padre Anchieta, 2310/20 - 1st floor - Champagnat*

City: *Curitiba*

State/Province: *Parana*

Country/Region/Territory: *Brazil*

Postal Code: *80420210*

Telephone: *+55 41 30787878/ +55 41 30716900*

Website: *http://www.parrocha.com.br*

For questions about this report, contact:

Contact Person: *Marcelo Paez Rocha*

Work E-mail Address: *marcelo.rocha@parrocha.com.br*

Job Title/Position: *Managing Owner and Licensed Customs Broker*

Primary Industry: *Consulting, Logistics / Freight Forwarding*

Types of services: *Consultant, Sales Agent/Representative, Other: Customs Agent*

Parrocha Assessoria, Consultoria e Logistica Ltda provides services in the following countries: *Brazil*

Parrocha Assessoria, Consultoria e Logistica Ltda asks to be paid, and makes payments from: *Brazil*

Method(s) by which Parrocha Assessoria, Consultoria e Logistica Ltda prefers to receive payments:
Wire Transfer

Brief description of the types of services that Parrocha Assessoria, Consultoria e Logistica Ltda provides: *Parrocha main service is to deal with Customs Agency on behalf of the customers and assist them with import/export documentation, country specific rules and regulations, calculation of duties and related taxes. Company focus is to ensure that goods are cleared through customs in a timely, seamless and economical manner, following all applicable laws and rules. Service includes but is not limited to:*

Imports Customs Clearance

Exports Customs Clearance

Special Regime Consultancy and Operation (Repetro, Temporary Import, Drawback, Dac, Fictitious Export, Customs Bonded Warehouse Etc)

Importation of used equipment

Tax exemption (EX Tarifário)

Import Licenses

Legal and tax Advise

International Logistics Consultancy and Advise

Feasibility Studies and Customs Tariff Consultancy

Additional Information: 2020: It's confirmed that "Parrocha" is the short form of the company's name. Some customers use it, but it is not the legal name for the company; "Parrocha Logistica Aduaneira" is not the legal registration name either, but is more frequently used.





Registration Information

Parrocha Assessoria, Consultoria e Logistica Ltda was established on: *17 December 2004*

Tax Identification Number of Parrocha Assessoria, Consultoria e Logistica Ltda: *07.150.082/0001-08*

Parrocha Assessoria, Consultoria e Logistica Ltda is registered as a legal entity and holds the following registrations, licenses or certifications:

Registration Number: *07.150.082/0001-08*

Registration Date: *17 December 2004*

This registration does not expire.

Office/Entity/Agency: *Brazil National Directory of Legal Entities*

City: *Curitiba*

Country/Region/Territory: *Brazil*

Copy of this registration:





REPÚBLICA FEDERATIVA DO BRASIL
CADASTRO NACIONAL DA PESSOA JURÍDICA

NÚMERO DE INSCRIÇÃO
07.150.082/0001-08
MATRIZ

COMPROVANTE DE INSCRIÇÃO E DE SITUAÇÃO
CADASTRAL

DATA DE ABERTURA
17/12/2004

NOME EMPRESARIAL
PARROCHA ASSESSORIA, CONSULTORIA E LOGISTICA LTDA.

TÍTULO DO ESTABELECIMENTO (NOME DE FANTASIA)

PORTE
EPP

CÓDIGO E DESCRIÇÃO DA ATIVIDADE ECONÔMICA PRINCIPAL
52.50-8-02 - Atividades de despachantes aduaneiros

CÓDIGO E DESCRIÇÃO DAS ATIVIDADES ECONÔMICAS SECUNDÁRIAS
70.20-4-00 - Atividades de consultoria em gestão empresarial, exceto consultoria técnica específica
52.50-8-03 - Agenciamento de cargas, exceto para o transporte marítimo
52.32-0-00 - Atividades de agenciamento marítimo
52.50-8-04 - Organização logística do transporte de carga

CÓDIGO E DESCRIÇÃO DA NATUREZA JURÍDICA
206-2 - Sociedade Empresária Limitada

LOGRADOURO
R PADRE ANCHIETA

NÚMERO
2310

COMPLEMENTO
**CONJ 11 ANDAR 01 COND LA DEFENSE
ED**

CEP
80.730-000

BAIRRO/DISTRITO
BIGORRILHO

MUNICÍPIO
CURITIBA

UF
PR

ENDEREÇO ELETRÔNICO

TELEFONE
(41) 3013-0212

ENTE FEDERATIVO RESPONSÁVEL (EFR)

SITUAÇÃO CADASTRAL
ATIVA

DATA DA SITUAÇÃO CADASTRAL
17/12/2004

MOTIVO DE SITUAÇÃO CADASTRAL

SITUAÇÃO ESPECIAL

DATA DA SITUAÇÃO ESPECIAL

Aprovado pela Instrução Normativa RFB nº 1.634, de 06 de maio de 2016.

Emitido no dia **03/12/2018** às **18:33:47** (data e hora de Brasília).

Página: **1/1**

English translation of this registration:





FEDERATIVE REPUBLIC OF BRAZIL
NATIONAL REGISTER OF LEGAL ENTITIES

REGISTRATION NUMBER 07.150.082/0001-08 MATRIX	RECEIPT OF SUBSCRIPTION AND REGISTRATION	OPENING DATE 17/12/2004
BUSINESS NAME PARROCHA ASSESSORIA, CONSULTORIA E LOGISTICA LTDA.		
TITLE OF ESTABLISHMENT (NAME OF FANTASY) *****		Porte? EPP
CODE AND DESCRIPTION OF THE MAIN ECONOMIC ACTIVITY 52.50-8-02 – Customs Broker Activities		
CODE AND DESCRIPTION OF SECONDARY ECONOMIC ACTIVITIES 70.20-4-00 – Business and management consultancy activities, except technical consultancy 52.50-8-03 – Freight forwarding, except for maritime transport 52.32-0-00 – Maritime agency activities 52.50-8-04 – Logistics organization of cargo transportation		
CODE AND DESCRIPTION OF THE LEGAL STATUS 206-2 – Limited Company Partnership		
PUBLIC PLACE STREET PADRE ANCHIETA	NUMBER 2310	COMPLEMENT CONJ 11 ANDAR 01 COND LA DEFENSE ED
ZIP CODE 80.730-000	NEIGHBORHOOD/DISTRICT BIGORRILHO	CITY CURITIBA
		FU PR
E-MAIL	PHONE (41) 3013-0212	
RESPONSIBLE FEDERATIVE ENTITY (EFR) *****		
CADASTRAL SITUATION ACTIVE	DATE OF SITUATION 17/12/2004	
REASON OF SITUATION REGISTRATION		
SPECIAL SITUATION *****	DATE OF SPECIAL SITUATION *****	

Approved by Normative Instruction RFB No. 1.634, dated May 6, 2016.

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.....
Registration Number: 41 2 0537635-9

Registration Date: 17 December 2004

This registration does not expire.

Office/Entity/Agency: *National Registry Department of Commerce, Registry of
Commerce of Parana*

City: *Curitiba*

Country/Region/Territory: *Brazil*

Copy of this registration:





MINISTÉRIO DO DESENVOLVIMENTO, INDÚSTRIA E COMÉRCIO EXTERIOR
DEPARTAMENTO NACIONAL DE REGISTRO DO COMÉRCIO
JUNTA COMERCIAL DO PARANÁ

CERTIDÃO SIMPLIFICADA

Página: 001 / 001

Certificamos que as informações abaixo constam dos documentos arquivados nesta Junta Comercial e são vigentes na data da sua expedição.

Nome Empresarial PARROCHA ASSESSORIA,CONSULTORIA E LOGISTICA LTDA EPP			
Natureza Jurídica: SOCIEDADE EMPRESÁRIA LIMITADA			
Número de Identificação do Registro de Empresas - NIRE (Sede) 41 2 0537635-9	CNPJ 07.150.082/0001-08	Data de Arquivamento do Ato Constitutivo 17/12/2004	Data de Início de Atividade 02/12/2004
Endereço Completo (Logradouro, N° e Complemento, Bairro, Cidade, UF, CEP) RUA VISCONDE DO RIO BRANCO, 1310-CONJUNTO 62 5 ANDAR, CENTRO, CURITIBA, PR, 80.420-210			
Objeto Social A) ESCRITÓRIO DE CONTATO DE PRESTAÇÃO DE SERVIÇOS DE DESPACHO ADUANEIRO; B) ESCRITÓRIO DE CONTATO DE AGENCIAMENTO DE CARGAS NACIONAIS E INTERNACIONAIS; C) ESCRITÓRIO DE CONTATO DE ORGANIZAÇÃO LOGÍSTICA; D) ESCRITÓRIO DE CONTATO DE CONSULTORIA E ASSESSORIA EM COMÉRCIO EXTERIOR.			
Capital: R\$ 10.000,00 (DEZ MIL REAIS)		Microempresa ou Empresa de Pequeno Porte (Lei nº 123/2006)	Prazo de Duração
Capital Integralizado: R\$ 10.000,00 (DEZ MIL REAIS)		Empresa de pequeno porte	Indeterminado
Sócios/Participação no Capital/Espécie de Sócio/Administrador/Término do Mandato			
<u>Nome/CPF ou CNPJ</u>	<u>Participação no capital (R\$)</u>	<u>Espécie de Sócio</u>	<u>Administrador</u>
MARCELO PAEZ ROCHA Redacted	4.900,00	SOCIO	Administrador
VANJA BALDO PAEZ ROCHA Redacted	100,00	SOCIO	
ALESSANDRO FERREIRA DA LUZ Redacted	5.000,00	SOCIO	Administrador
Último Arquivamento		Situação	
Data: 17/01/2013	Número: 20130153613	REGISTRO ATIVO	
Ato: ALTERAÇÃO		Status	
Evento (s): ABERTURA DE FILIAL EM OUTRA UF CONSOLIDAÇÃO DE CONTRATO/ESTATUTO		XXXXXXXXXXXXXXXXXXXX	
Filial(ais) nesta Unidade da Federação ou fora dela			
1 - NIRE: XXXXXXXXXXXX		CNPJ: XXXXXXXXXXXXXXXX	
Endereço Completo (Logradouro, N° e Complemento, Bairro, Cidade, UF, CEP, Pais) RUA MAYRINK VEIGA, 4 - 13 ANDAR, CENTRO, RIO DE JANEIRO, RJ, BRASIL			
2 - NIRE: XXXXXXXXXXXX		CNPJ: XXXXXXXXXXXXXXXX	
Endereço Completo (Logradouro, N° e Complemento, Bairro, Cidade, UF, CEP, Pais) RUA SAMUEL HEUSI, 463 - SALA 712, CENTRO, ITAJAÍ, SC, 88.301-320, BRASIL			

CURITIBA - PR, 19 de abril de 2013



Smotta :

SEBASTIÃO MOTTA
SECRETARIO GERAL

English translation of this registration:



[Coat of Arms
of the State of
Paraná]

**MINISTRY OF DEVELOPMENT, INDUSTRY AND FOREIGN TRADE
NATIONAL REGISTRY DEPARTMENT OF COMMERCE
REGISTRY OF COMMERCE OF PARANÁ**

SIMPLIFIED CERTIFICATE

Page: 001/001

We hereby certify that the information below is in the filed documents in this Registry of Commerce and are valid on its issue date.

Company Name PARROCHA ASSESSORIA, CONSULTORIA E LOGISTICA LTDA. EPP Corporate Type: LIMITED LIABILITY COMPANY			
Company Registry Number ("NIRE") (Main place of business) 41 2 0537635-9	Corporate Taxpayer ID ("CNPJ") 07.150.082/0001-08	Filing Date of Charter 12/17/2004	Start-up Date 12/02/2004
Full Address (Street, # and Complement, District, City, State, ZIP Code) RUA VISCONDE DO RIO BRANCO, 1310-CONJUNTO 62 5 ANDAR, CENTRO, CURITIBA, PR, 80.420-210			
Corporate Purpose A) CONTACT OFFICE OF RENDERING OF CUSTOMS CLEARANCE SERVICE; B) CONTACT OFFICE OF NATIONAL AND INTERNATIONAL FREIGHT FORWARDER; C) CONTACT OFFICE OF LOGISTICAL ORGANIZATION; D) CONTACT OFFICE OF CONSULTING AND ASSISTANCE IN FOREIGN TRADE.			
Capital: 10,000.00 (TEN THOUSAND REAIS)	Paid-in-Capital: 10,000.00 (TEN THOUSAND REAIS)	Micro company or Small Business (Law # 123/2006) Small Business	Term of Duration Indeterminate
Partners/Capital Participation/Type of Partner/Administrator/End of Term of Office			
Name/CPF¹ or CNPJ	Capital Participation (R\$)	Type of Partner	Administrator End of Term of Office
MARCELO PAEZ ROCHA Redacted	4,900.00	PARTNER	Administrator XXXXXXXXXX
VANJA BALDO PAEZ ROCHA Redacted	100.00	PARTNER	XXXXXXXXXX
ALESSANDRO FERREIRA DA LUZ Redacted	5,000.00	PARTNER	Administrator XXXXXXXXXX
Last Filing		Status	
Date: 01/17/2013	Number: 2013015613	ACTIVE REGISTRY	
Act: CHANGE		Status	
Event(s): OPENING OF A BRANCH ON OTHER STATE CONTRACT/BY-LAWS CONSOLIDATION		XXXXXXXXXXXXXXXXXXXX	
Branch(es) in this State or outside			
1 - NIRE: XXXXXXXXXXXX		CNPJ: XXXXXXXXXXXX	
Full Address (Street, # and Complement, District, City, State, ZIP Code) RUA MAYRINK VEIGA, 4 - 13 ANDAR, CENTRO, RIO DE JANEIRO, RJ, BRAZIL			
1 - NIRE: XXXXXXXXXXXX		CNPJ: XXXXXXXXXXXX	
Full Address (Street, # and Complement, District, City, State, ZIP Code) RUA SAMUEL HEUSI, 463 - SALA, 712, CENTRO, ITAJAÍ, SC, 88.301-320, BRAZIL			

13/368121-1
[Bar code]

CURITIBA - PR, July 12, 2013.
[Partially legible signature]
SEBASTIÃO MOTTA
GENERAL SECRETARY

¹ Individual Taxpayer ID

Additional Information: *The company address in the registration #4120537635-9 was Parrocha Assessoria, Consultoria e Logistica Ltda's former address.*





Ownership Information & Board of Directors

Parrocha Assessoria, Consultoria e Logistica Ltda is a Private Company.

The following individuals have an ownership interest in Parrocha Assessoria, Consultoria e Logistica Ltda:

Name: *Vanja Baldo Paez Rocha*
Job Title/Position: *Shareholder*
Ownership Percent: *51%*

Name: *Marcelo Paez Rocha*
Job Title/Position: *Managing Owner and Licensed Customs Broker*
Ownership Percent: *49%*

No corporations or other legal entities have an ownership interest in Parrocha Assessoria, Consultoria e Logistica Ltda.

Parrocha Assessoria, Consultoria e Logistica Ltda is more than 50% owned directly by a woman/women.

Parrocha Assessoria, Consultoria e Logistica Ltda does not have a Board of Directors.

Additional Information: *It's confirmed that Alessandro Ferreira da Luz, mentioned in the registration #4120537635-9, is no longer the owner of the company.*



Personnel

Parrocha Assessoria, Consultoria e Logística Ltda's total number of personnel (including managers and directors): 13

The following personnel of Parrocha Assessoria, Consultoria e Logística Ltda are authorized to make binding decisions for Parrocha Assessoria, Consultoria e Logística Ltda and enter into contracts with clients:

Name: *Marcelo Paez Rocha*
Job Title/Position: *Managing Owner and Licensed Customs Broker*

The following personnel of Parrocha Assessoria, Consultoria e Logística Ltda market or sell products/services to customers:

Name: *Marcelo Paez Rocha*
Job Title/Position: *Managing Owner and Licensed Customs Broker*

The following personnel of Parrocha Assessoria, Consultoria e Logística Ltda may interact with a government official or government entity:

Name: *Marcelo Paez Rocha*
Job Title/Position: *Managing Owner and Licensed Customs Broker*

Name: *Duilio Mazurek Rodrigues*
Job Title/Position: *Licensed Customs Broker and Customs Analyst*

Name: *Rael Alan Breda*
Job Title/Position: *Customs Analyst and Customs Broker Assistant*

Name: *Reginaldo Barbosa dos Santos Filho*
Job Title/Position: *Customs Broker*

Additional Information: 2020: *Marlene da Silva Feijo, listed in previous reports, is retired and no longer associated with the company.*



Name Confirmation Document

Name Confirmation Document

Name Provided to TRACE	Given/ First Name	Middle Name(s) / Patronymic	Family/ Last Name(s)	Name(s) Commonly Used in Business
Vanja Baldo Paez Rocha	Vanja		Baldo Paez Rocha	Vanja Baldo
Marcelo Paez Rocha	Marcelo		Paez Rocha	Marcelo Parrocha
Duilio Mazurek Rodrigues	Duilio		Mazurek Rodrigues	Dulio Mazurek Rodrigues
Rael Alan Breda	Rael	Alan	Breda	Rael Breda
Reginaldo Barbosa dos Santos Filho	Reginaldo		Barbosa dos Santos Filho	Reginaldo Barbosa dos Santos Filho





Resumes/CVs

Name: *Vanja Baldo Paez Rocha*

Citizenship: *Brazil*

Vanja Baldo Paez Rocha is not involved in the day-to-day operations of Parrocha Assessoria, Consultoria e Logistica Ltda.

Position/Relationship with Parrocha Assessoria, Consultoria e Logistica Ltda: *Shareholder*

Vanja Baldo Paez Rocha holds the following positions or ownership interests in entities other than Parrocha Assessoria, Consultoria e Logistica Ltda:

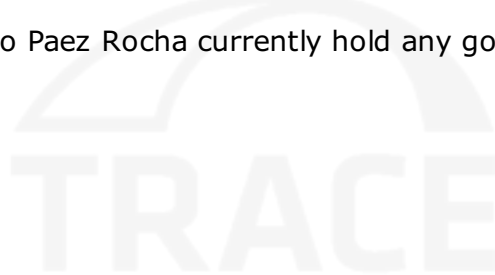
Company: *GPSB Assessoria E Consultoria Logistica Ltda*

Position: *Partner*

Vanja Baldo Paez Rocha has not held or worked in a government or military position in the last seven years.

Vanja Baldo Paez Rocha does not currently hold any position with a political party or political campaign and is not currently a candidate for any political office.

No family members of Vanja Baldo Paez Rocha currently hold any government positions.



Name: *Marcelo Paez Rocha*

Citizenship: *Brazil, United States of America*

Marcelo Paez Rocha is involved in the day-to-day operations of Parrocha Assessoria, Consultoria e Logistica Ltda.

Company/Entity	Position	Beginning Date	Does Marcelo Paez Rocha <u>currently</u> hold this position?	Ending Date
Parrocha Assessoria, Consultoria e Logistica Ltda	Managing Owner and Licensed Customs Broker	December 2004	Marcelo Paez Rocha currently holds this position.	

Marcelo Paez Rocha holds the following positions or ownership interests in entities other than Parrocha Assessoria, Consultoria e Logistica Ltda:

Company: *GPSB Assessoria e Consultoria Logistica Ltda*

Position: *Partner*

.....
Company: *MS Logistica Aduaneira*

Position: *Branch Manager and Customs Broker*

Marcelo Paez Rocha has not held or worked in a government or military position in the last seven years.

Marcelo Paez Rocha does not currently hold any position with a political party or political campaign and is not currently a candidate for any political office.

No family members of Marcelo Paez Rocha currently hold any government positions.

Name: *Duilio Mazurek Rodrigues*

Citizenship: *Brazil*

Duilio Mazurek Rodrigues is involved in the day-to-day operations of Parrocha Assessoria, Consultoria e Logistica Ltda.

Company/Entity	Position	Beginning Date	Does Duilio Mazurek Rodrigues <u>currently</u> hold this position?	Ending Date
Parrocha Assessoria, Consultoria e Logistica Ltda	Licensed Customs Broker and Customs Analyst	October 2008	Duilio Mazurek Rodrigues currently holds this position.	

Duilio Mazurek Rodrigues does not hold a position or ownership interest in any entity other than Parrocha Assessoria, Consultoria e Logistica Ltda.

Duilio Mazurek Rodrigues has not held or worked in a government or military position in the last seven years.

Duilio Mazurek Rodrigues does not currently hold any position with a political party or political campaign and is not currently a candidate for any political office.

No family members of Duilio Mazurek Rodrigues currently hold any government positions.



Name: *Rael Alan Breda*

Citizenship: *Brazil*

Rael Alan Breda is involved in the day-to-day operations of Parrocha Assessoria, Consultoria e Logistica Ltda.

Company/Entity	Position	Beginning Date	Does Rael Alan Breda currently hold this position?	Ending Date
Parrocha Assessoria, Consultoria e Logística LTDA.	Customs Analyst and Customs Broker Assistant	January 2009	Rael Alan Breda currently holds this position.	

Rael Alan Breda does not hold a position or ownership interest in any entity other than Parrocha Assessoria, Consultoria e Logistica Ltda.

Rael Alan Breda has not held or worked in a government or military position in the last seven years.

Rael Alan Breda does not currently hold any position with a political party or political campaign and is not currently a candidate for any political office.

No family members of Rael Alan Breda currently hold any government positions.



Name: *Reginaldo Barbosa dos Santos Filho*

Citizenship: *Brazil*

Reginaldo Barbosa dos Santos Filho is involved in the day-to-day operations of Parrocha Assessoria, Consultoria e Logistica Ltda.

Company/Entity	Position	Beginning Date	Does Reginaldo Barbosa dos Santos Filho <u>currently</u> hold this position?	Ending Date
Parrocha Assessoria, Consultoria e Logistica Ltda.	Customs Broker	January 2018	Reginaldo Barbosa dos Santos Filho currently holds this position.	
Parrocha Assessoria, Consultoria e Logistica Ltda.	External Consultant	January 2010	No	January 2018

Reginaldo Barbosa dos Santos Filho does not hold a position or ownership interest in any entity other than Parrocha Assessoria, Consultoria e Logistica Ltda.

Reginaldo Barbosa dos Santos Filho has not held or worked in a government or military position in the last seven years.

Reginaldo Barbosa dos Santos Filho does not currently hold any position with a political party or political campaign and is not currently a candidate for any political office.

No family members of Reginaldo Barbosa dos Santos Filho currently hold any government positions.

TRACE



Associated Offices & Entities

Parrocha Assessoria, Consultoria e Logistica Ltda does not have any subsidiary organizations or joint ventures.

Parrocha Assessoria, Consultoria e Logistica Ltda has the following branch offices:

Name: *Parrocha Assessoria, Consultoria e Logistica Ltda*
City: *Rio de Janeiro*
Country/
Region/
Territory: *Brazil*

Parrocha Assessoria, Consultoria e Logistica Ltda is not part of a group of companies.

Parrocha Assessoria, Consultoria e Logistica Ltda uses the following individuals or entities to provide services or to perform part of Parrocha Assessoria, Consultoria e Logistica Ltda's activities.

Name: *GPSB Assessoria e Consultoria Logistica Ltda*
Provides services in the following manner: *Provide freight forwarding and logistics services to Parrocha Assessoria, Consultoria e Logistica Ltda's clients.*

Parrocha Assessoria, Consultoria e Logistica Ltda has not been a party to any mergers or acquisitions over the past 5 years.

No other person, entity, government or government entity has any management right or financial interest in Parrocha Assessoria, Consultoria e Logistica Ltda.

Additional Information: *"GPSB Assessoria E Consultoria Logistica Ltda" (also known as "Global Project Services"), is a Brazilian Licensed Freight Forwarding Company.*

The company has offices in Curitiba (main office) and Rio de Janeiro. The office in Itajai, mentioned in the registration #41205376359, is closed. The reason there are a list of multiple locations on the website is that the company can provide services in every location since the customs processes are electronic now.

"MS Logistica Aduaneira", listed as an outside position for Marcelo Paez Rocha, does not provide third party services on behalf of Parrocha Assessoria, Consultoria e Logistica Ltda's services and clients.



Other Engagements

Parrocha Assessoria, Consultoria e Logística Ltda will not market products or services to any government, government-controlled, or military entity, including state-owned enterprises.

Parrocha Assessoria, Consultoria e Logística Ltda does not have any contracts with, or provide services directly to, any government, government-controlled or military entity, including any state-owned enterprises.

No people listed in this report directly have any contracts with, or provide services directly to, any government, government-controlled or military entity, including any state-owned enterprises.

Additional Information: 2020: Intermediary confirmed that "as customs brokers we do interact with government entities on behalf of our customers as part of the services rendered, but we do not service the government nor have contracts or business relations. We do handle paperwork and interact during the customs clearance process".





Enforcement Information

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda was convicted of violating any rules or regulations governing the purchase or sale of goods or services to or by any government within the past seven years.

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda was interviewed, deposed or subpoenaed in connection with any litigation or investigation involving any government regulations within the past seven years.

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda was found guilty of violating any law governing donations, contributions, honoraria or any other form of remuneration to any government official or any individual working for a commercial enterprise within the past seven years.

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda was interviewed, deposed or subpoenaed in connection with any litigation or investigation involving any law governing donations, contributions, honoraria or any other form of remuneration to any government official or any individual working for a commercial enterprise within the past seven years.

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda was interviewed, subpoenaed or asked to testify before any legislative body concerning fraud or abuse with regard to any governmental procurements within the past seven years.

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda was found guilty of any violations of securities or commodities trading laws within the past seven years.

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda was interviewed, deposed or subpoenaed in connection with any litigation or investigation involving any violations of securities or commodities trading laws within the past seven years.

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda was found guilty of any violation of any laws governing the regulation of antitrust practices within the past seven years.

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda was the subject of, or mentioned by name in, any newspaper or magazine article in an adverse manner within the past seven years.

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda was charged, interviewed or found guilty concerning income tax evasion within the past seven years.

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda was convicted of a felony or other criminal act for any matter not listed above within the past seven years.

Excluding traffic charges, no person associated with Parrocha Assessoria, Consultoria e Logistica Ltda was arrested, charged, cited or held by law enforcement authorities regardless of whether the charge was dropped, dismissed or a verdict of not guilty was entered within the past seven years.

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda was debarred from competing for World Bank contracts within the past seven years.

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda was debarred from competing for government contracts in any country within the past seven years.

No person or company associated with has had a security clearance denied or revoked within the past seven years.

No person associated with Parrocha Assessoria, Consultoria e Logistica Ltda was discharged from any Armed Forces with other than an honorable discharge within the past seven years.

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda was the subject of any voluntary or involuntary bankruptcy or other similar proceeding within the past seven years.

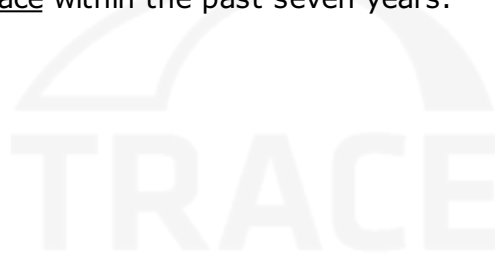
No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda is named on any regulatory or government watch lists.

No person or company associated with admitted guilt for, was convicted of, or is currently under investigation for Trade Control violations (such as violations of export controls, sanctions, and anti-boycott laws or regulations) within the past seven years.

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda was placed on any restricted parties lists within the past seven years.

No person or company associated with Parrocha Assessoria, Consultoria e Logistica Ltda has any offices or other operations in Cuba, Iran, North Korea, the Republic of Sudan or Syria.

No person or company associated with donated, sold, exported, re-exported or otherwise transferred, purchased or imported, directly or indirectly through third countries or parties, equipment, products, funds or services to or from Cuba, Iran, North Korea, the Republic of Sudan or Syria or otherwise serviced (or requested services in relation to) products located in these countries without the requisite license in place within the past seven years.





Literature

Parrocha Assessoria, Consultoria e Logistica Ltda did not provide a brochure, company profile, or other literature. Please visit Parrocha Assessoria, Consultoria e Logistica Ltda's website (if available) for additional information.

Parrocha Assessoria, Consultoria e Logistica Ltda did not provide pictures of offices, facilities and equipment relevant to providing services.





Financials

Parrocha Assessoria, Consultoria e Logística Ltda has stated that its books and records are maintained in accordance with generally accepted accounting practices.

Parrocha Assessoria, Consultoria e Logística Ltda does not have a recent audited financial statement prepared by an external auditor.

Financial document: *Reference letter from external accountant*

A copy of the recent financial reference document:



ESCRITÓRIO EMPRESARIAL STOCCO LTDA.
Rua João Bettega Street, 2052 - Cj.02 - Gate - Curitiba - Pr - Brazil
email - stocco@stoccoempresarial.com.br
handset (41) 3288-1000

REGULAR ACCOUNTING STATEMENT

We hereby declare for the proper purposes that we have as our client the company Parrocha, Assessoria, Consultoria e Logística Ltda., Registered with the CNPJ under No. 07.150.082/0001-08, Nheadquartered at Rua Padre Anchieta, 2310 – Conj. 11 - 1 floor, neighborhood: Bigorriho, Municipality: Curitiba Accounting Standards and the Brazilian, since December 17, 2004 and the company has had regular bookkeeping and books in accordance with the fundamental accounting principles and the Brazilian Accounting Standards BR GAPP.

Curitiba (Pr), January 10, 2020.


MAURO ROBERTO STOCCO
Contador / Auditor / CRC/PR 26.174/O-0
Rua João Bettega, 2052 - Cjs. 01/02 - Portão
81070-001 - Curitiba - PR
CPF 457.300.169-72

00.404.441/0001-59

**ESCRITÓRIO EMPRESARIAL
STOCCO LTDA.**

**RUA JOÃO BETTEGA, 2052
CONJ. 01/02 - PORTÃO**

CEP 81.070-001 - CURITIBA - PARANÁ

Parrocha Assessoria, Consultoria e Logística Ltda has certified that it is adequately financed and has sufficient resources to conduct business.





Business References

Business References:

Company Name: *Aker Solutions Do Brasil Ltda*
Contact Name: *Sara Mendes*
Job Title: *Logistics & Foreign Trade Coordinator*
Work Email Address: *sara.mendes@akersolutions.com*
Address: *Rua Antonio Singer, 3411, Campo Largo da Roseira*
City: *Curitiba*
State/Province: *Parana*
Postal Code: *83.091-002*
Country: *Brazil*
Telephone: *+55 41 3327-8428*

Company Name: *Jtekt Automotive Do Brasil*
Contact Name: *Catia Lucion Breda*
Job Title: *Foreign Trade and Production Administrative*
Work Email Address: *catia.lucion@jtekt.com.br*
City: *Sao Jose dos Pinhais*
State/Province: *Parana*
Country: *Brazil*
Telephone: *+55 4121028726*

Company Name: *MHWirth do Brasil Equipamentos Ltda*
Contact Name: *Priscila Souto*
Job Title: *Logistics Supervisor*
Work Email Address: *priscila.souto@mhwirth.com*
Address: *Rua Sergio Roberto Franco, s/n, Quadra 03 parte, Fazenda Boa Vista, Imboassica, CEP 27932-354 Macaé-RJ, Brazil*
City: *Macaé - RJ*
State/Province: *RJ*
Postal Code: *27932-354*
Country: *Brazil*
Telephone: *+55 22 2141-3179*



Compliance Information

TRACE Code of Conduct

Parrocha Assessoria, Consultoria e Logística Ltda hereby adopts the following Code of Conduct with respect to all commercial transactions, whether local or international:

LOCAL AND FOREIGN LAWS: Neither Parrocha Assessoria, Consultoria e Logística Ltda, nor anyone acting on behalf of Parrocha Assessoria, Consultoria e Logística Ltda, may, directly or indirectly, break or seek to evade the laws or regulations of any country in, through, or with which Parrocha Assessoria, Consultoria e Logística Ltda seeks to do business. That an illegal act is a “customary business practice” in any country is not sufficient justification for violation of this provision.

BRIBERY AND FACILITATING PAYMENTS: Neither Parrocha Assessoria, Consultoria e Logística Ltda, nor anyone acting on behalf of Parrocha Assessoria, Consultoria e Logística Ltda, may, directly or indirectly, offer or provide a bribe, and all demands for bribes must be expressly rejected.

Bribery includes any offer, promise, or gift of any pecuniary or other advantage, whether directly or through intermediaries, to a public official, political party, political candidate or party official or any private sector employee, in order that the official or employee act or refrain from acting in relation to the performance of their duties, in order to obtain or retain business or other business advantage.

Neither Parrocha Assessoria, Consultoria e Logística Ltda, nor anyone acting on behalf of Parrocha Assessoria, Consultoria e Logística Ltda, shall offer or make facilitating payments to government officials in order to encourage them to expedite a routine governmental task that they are otherwise required to undertake. Parrocha Assessoria, Consultoria e Logística Ltda, or anyone acting on behalf of Parrocha Assessoria, Consultoria e Logística Ltda, shall have discretion to deviate from this prohibition if he/she believes that there is an immediate threat to his/her or another’s health or safety. The circumstances of such payment must be reported as soon as possible after the event and the payment properly recorded. Parrocha Assessoria, Consultoria e Logística Ltda recognizes that extortion is widespread and that participation by the business community increases demand for facilitating payments.

KICK-BACKS: Neither Parrocha Assessoria, Consultoria e Logística Ltda, nor anyone acting on behalf of Parrocha Assessoria, Consultoria e Logística Ltda, may offer or accept a “kick-back” of any portion of a contract payment to employees of other parties to a contract or use other vehicles such as subcontracts, purchase orders or consulting agreements to channel payments to government officials, political candidates, employees of other parties to a contract, their relatives or business associates.

A “kickback” is a particular form of bribe which takes place when a person entrusted by an employer or public function has some responsibility for the granting of a benefit and does so in a way that secures a return (kickback) of some of the value of that transaction or benefit for that person without the knowledge or authorization of the employer or public body to which the person is accountable.

CONFLICTS OF INTEREST: Parrocha Assessoria, Consultoria e Logística Ltda, and anyone acting on behalf of Parrocha Assessoria, Consultoria e Logística Ltda, shall avoid any relationship or activity that might impair, or appear to impair, the ability to render objective and appropriate business decisions in the performance of our jobs.

POLITICAL CONTRIBUTIONS: Neither Parrocha Assessoria, Consultoria e Logística Ltda, nor anyone acting on behalf of Parrocha Assessoria, Consultoria e Logística Ltda, may make a political contribution in order to obtain an unlawful business advantage. Parrocha Assessoria, Consultoria e

Logistica Ltda shall comply with all public disclosure requirements.

PHILANTHROPIC CONTRIBUTIONS: Parrocha Assessoria, Consultoria e Logistica Ltda, and anyone acting on behalf of Parrocha Assessoria, Consultoria e Logistica Ltda, may make contributions only for bona fide charitable purposes and only where permitted by the laws of the country in which the contribution is made. Contributions made in order to obtain an unlawful business advantage are prohibited.

EXTORTION: Parrocha Assessoria, Consultoria e Logistica Ltda, and anyone acting on behalf of Parrocha Assessoria, Consultoria e Logistica Ltda, shall reject any direct or indirect request by a public official, political party, party official, or private sector employee for undue pecuniary or other advantage, to act or refrain from acting in relation to his or her duties.

GIFTS, HOSPITALITY AND ENTERTAINMENT: Parrocha Assessoria, Consultoria e Logistica Ltda, and anyone acting on behalf of Parrocha Assessoria, Consultoria e Logistica Ltda, shall avoid the offer or receipt of gifts, meals, entertainment, hospitality or payment of expenses whenever these could materially affect the outcome of business transactions, are not reasonable and bona fide expenditures, or are in violation of the laws of the country of the recipient.

REPORTING REQUIREMENT: All officers and employees of Parrocha Assessoria, Consultoria e Logistica Ltda and anyone acting on behalf of Parrocha Assessoria, Consultoria e Logistica Ltda shall promptly report any actual or potential violation of this Code of Conduct, including any instance in which he/she is subjected to any form of extortion or is asked to participate in any way in a bribery scheme, to Parrocha Assessoria, Consultoria e Logistica Ltda senior corporate management, without fear that his/her business relationship or employment will be adversely affected. Reports shall be treated confidentially to the extent possible, consistent with the need to conduct a thorough investigation.

COMPANY RESPONSE: No employee will suffer demotion, penalty or other adverse consequences for not paying bribes even when Parrocha Assessoria, Consultoria e Logistica Ltda may lose business as a result of the employee's refusal to do so. Employees are required to report alleged violations of this Code of Conduct to senior management and no employee will suffer demotion, penalty or adverse consequences for reporting.

Parrocha Assessoria, Consultoria e Logistica Ltda shall, where appropriate, sanction employees, suppliers or other business partners for violations of this Code of Conduct.

ACCOUNTS: Parrocha Assessoria, Consultoria e Logistica Ltda shall maintain complete and accurate financial records, ensuring that all transactions are properly, accurately and fairly recorded in a single set of books.

COMMUNICATIONS AND TRAINING: Parrocha Assessoria, Consultoria e Logistica Ltda agrees to participate in anti-corruption training provided by TRACE, or by a comparable organization, and to make annual training available for all principals and for all key employees involved in sales, marketing, and procurement.

The person whose signature appears below is duly authorized to adopt this Code of Conduct on behalf of Parrocha Assessoria, Consultoria e Logistica Ltda and, if signing on behalf of a company, agrees that this Code shall apply to all officers, employees and representatives of Parrocha Assessoria, Consultoria e Logistica Ltda.

I hereby adopt and agree to comply with the TRACE Code of Conduct as outlined above.

I understand that violation of the Code of Conduct will be grounds for immediate revocation of TRACE Certification, if applicable.

Electronic Signature: *Marcelo Paez Rocha*

Title: *Managing Owner and Licensed Customs Broker*

Date: 10 January 2020



Parrocha Assessoria, Consultoria e Logística Ltda will distribute this anti-bribery policy to its employees.

Parrocha Assessoria, Consultoria e Logística Ltda will require its subsidiaries, affiliates, joint-venture partners, suppliers, subcontractors and other third parties to comply with this anti-bribery policy.

Parrocha Assessoria, Consultoria e Logística Ltda has a written compliance policy.

The compliance policy is distributed to employees.

Parrocha Assessoria, Consultoria e Logística Ltda requires its subsidiaries, affiliates, joint-venture partners, suppliers, subcontractors and other third parties to comply with its compliance policy.

Parrocha Assessoria, Consultoria e Logística Ltda has a system that allows its employees to ask questions or report concerns regarding compliance and anti-bribery matters.

Parrocha Assessoria, Consultoria e Logística Ltda conducts periodic assessments of compliance and anti-bribery risks.

The last assessment was completed: *10 October 2018*

Parrocha Assessoria, Consultoria e Logística Ltda has a policy addressing human rights awareness, education and training.

Parrocha Assessoria, Consultoria e Logística Ltda does not have a DUNS number.





Reputational Screening

Reputational Screening Results Summary for Parrocha Assessoria, Consultoria e Logística Ltda

21 January 2020

No results were found.



Reputational Screening Results Summary for Parrocha Assessoria, Consultoria e Logistica Ltda

12 December 2018

No results were found.



Reputational Screening Results Summary for Parrocha Assessoria, Consultoria e Logística Ltda

27 November 2017

No results were found.



Reputational Screening Results Summary for PARROCHA ASSESSORIA, CONSULTORIA E LOGISTICA LTDA

January 20, 2016

No adverse results were found.



Reputational Screening Results Summary for PARROCHA ASSESSORIA, CONSULTORIA E LOGISTICA LTDA

October 14, 2014

No adverse results were found.





Internet-Based Search Table for
PARROCHA ASSESSORIA, CONSULTORIA E LOGISTICA LTDA

September 27, 2013

Subject of Search	Notes
PARROCHA ASSESSORIA, CONSULTORIA E LOGISTICA LTDA	None
PARROCHA LOGISTICA ADUANEIRA	None
Marcelo Paez Rocha	None
Marcelo Parrocha	None
Alessandro Ferreira da Luz	None
Alessandro Ferreira	None

Additional notes: *None*

GENERAL NOTES:

"None" under notes indicates that 0 hits were received or the hits were eliminated without requiring follow-up with the intermediary.



Denied Parties / PEP Table for
PARROCHA ASSESSORIA, CONSULTORIA E LOGISTICA LTDA

September 27, 2013

Each individual name and business entity included in the media search is also run through a PEP and Denied parties screening. The PEP and Denied Parties Screen for < PARROCHA ASSESSORIA, CONSULTORIA E LOGISTICA LTDA > produced hits for the following names:

PEP Results

Subject of Search	Government/Political Positions	Dates
	No results	

Denied Party Results

Subject of Search	Issuing Body/ Alleged violation	Dates
	No results	



Media Search Table for
PARROCHA ASSESSORIA, CONSULTORIA E LOGISTICA LTDA

September 27, 2013

SUBJECT OF SEARCH/ SECTION OF THE REPORT	NOTES
Questionnaire:	
PARROCHA ASSESSORIA, CONSULTORIA E LOGISTICA LTDA	None
PARROCHA LOGISTICA ADUANEIRA	None
Marcelo Paez Rocha	None
Marcelo Parrocha	None
Vanja Baldo Paez Rocha	None
Vanja Baldo	None
Alessandro Ferreira da Luz	None
Alessandro Ferreira	None
Duilio Mazurek Rodrigues	None
Duilio Mazurek	None
Rael Alan Breda	None
Rael Breda	None
Ubiranilson Moraes	None
Bira Moraes	None

Jose Henrique Durans	None
Zé Henrique	None
Odair Tomazi	None
Oda Tomazi	None
GPSB ASSESSORIA E CONSULTORIA LOGISTICA LTDA	None
GLOBAL PROJECT SERVICES	None
Registrations:	
None	
Literature:	
None	
Resumes:	
None	
Financials:	
None	
Other documents:	
None	

Additional Notes: *None*

GENERAL NOTES: Universal characters (*s and !) are used to search terms when Westlaw cannot complete a search based on the string of consonant and vowels contained in some names. TE is used to search only within the text of the articles. The total number of documents listed on the research trail reflects duplicate articles, if any were found. These articles are automatically removed by Westlaw from the attached list.

“None” under notes indicates that 0 hits were received or the hits were eliminated without requiring follow-up with the intermediary.

*Prior employment/directorship/ownership/employee; no further media search needed.

+Search string amended due to numerous results.



Anti-Bribery Training

This is to certify that on
28 January 2020

Marcelo Paez Rocha

has successfully completed the coursework and the
examination for the TRACE Anti-Bribery Course and has
thereby earned this certificate.

www.TRACEinternational.org



EMAIL:

info@TRACEinternational.org

WEBSITE:

www.TRACEinternational.org

TEL: +1 410.990.0076

FAX: +1 410.990.0707

TRACE INC. AND TRACE INTERNATIONAL

151 West Street
Annapolis, MD 21401

WORLDWIDE OFFICES:

Manila	Paris
New York	Vancouver