

OFFENSE PREVENTION MODEL



BOARD OF DIRECTORS



OFFENSE PREVENTION OFFICER (OPO)

AUTONOMY AND
INDEPENDENCE

ACCESS TO THE BOARD OF
DIRECTORS AND MANAGEMENT

MATERIAL MEANS
AND RESOURCES

COMPLIANCE STRUCTURE

CONTROL ENVIRONMENTS

OPM ACTIVITIES

Internal Prevention Responsible Parties
Areas that report to the OPO
Other areas that support OPO
Ethics and Compliance Committee
Legal Counselors

Offense Prevention Policy
OPM Risk Matrix
Ethics Code
Internal Order, Hygiene and Safety Regulations
and others
Compliance documents and policies

Applicability Analysis
Risk Matrix design
Prevention measures
Detection measures
Response measures
Whistleblower channel management
Application of internal sanctions

Continuous improvement

MONITORING

EVALUATION

AUDIT

TRACEABILITY AND RECORD OF OPM OPERATION