

INSTITUTIONAL SUBMISSION OF THE BRAZILIAN CHEMICAL INDUSTRY ASSOCIATION (ABIQUIM) IN THE CONTEXT OF THE USTR PUBLIC CONSULTATION — SECTION 301 OF THE TRADE ACT OF 1974 — INVESTIGATION ON FORCED LABOR

Reference: Docket USTR-2026-0133 — *Initiation of Section 301 Investigations of Acts, Policies, and Practices of Various Economies Related to the Failure To Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced With Forced Labor* (Federal Register, March 17, 2026)

Date of submission: April 15, 2026

The **Brazilian Chemical Industry Association (“ABIQUIM”)**, the representative entity of the Brazilian chemical industry, headquartered in São Paulo, State of São Paulo, Federative Republic of Brazil, acting in the exercise of its institutional prerogative and in the legitimate interest of its member companies, hereby respectfully submits to the *United States Trade Representative (“USTR”)*, within the scope of the **Public Consultation initiated under Section 301 of the Trade Act of 1974**, concerning the investigation into the alleged failure of countries to effectively prohibit and enforce the importation of goods produced with forced labor (Docket USTR-2026-0133, published in the *Federal Register* on March 17, 2026), this **institutional submission**, on the following terms, regarding:

- (i) the **legal framework in force in the Federative Republic of Brazil for combating forced labor**, encompassing constitutional, criminal, labor, and administrative provisions;
- (ii) the **enforcement, repression, and sanctioning mechanisms** adopted by the Brazilian State, including the relevant public policies and inter-institutional actions;
- (iii) the **responsibility and commitment of the Brazilian chemical industry** to full compliance with labor legislation and to the principles of responsible business conduct; and
- (iv) the **structural characteristics of the chemical and petrochemical sector**, which render this sector structurally incompatible with forced labor practices.

1. Brazilian Legal Framework for Combating Forced Labor

Brazil has a comprehensive and effective legal framework for preventing, repressing, and sanctioning forced labor, grounded in constitutional principles, criminal provisions, labor legislation, administrative enforcement mechanisms, and international commitments. The pillars of this framework are set forth below.

1.1. Federal Constitution of 1988

The Federal Constitution enshrines human dignity and workers’ rights as fundamental principles of the Republic:

- **Article 1, Section III:** human dignity as a foundation of the Federative Republic of Brazil;



- **Article 1, Section IV:** the social values of labor and free enterprise as a foundation of the Democratic Rule of Law;
- **Article 5, Section III:** guarantee that no one shall be subjected to torture or to inhuman or degrading treatment;
- **Article 7:** protects the rights of urban and rural workers, ensuring dignified working conditions, in addition to other rights aimed at improving their social condition;
- **Article 170:** the economic order, founded on the valorization of human labor and free enterprise, aims to ensure a dignified existence for all, in accordance with the dictates of social justice;
- **Article 243:** as amended by Constitutional Amendment No. 81/2014, provides for the expropriation of rural and urban properties where the exploitation of slave labor is found, allocating them to agrarian reform and social housing programs.

These constitutional provisions apply uniformly to all economic sectors, constituting the normative foundation upon which the entire Brazilian policy for combating forced labor is built.

1.2. Criminal Legislation

Forced labor is expressly criminalized under Brazilian law. **Article 149 of the Criminal Code**, as amended by Law No. 10,803/2003, defines the crime of reducing a person to a condition analogous to slavery, punishable by imprisonment of two to eight years and a fine, in addition to the penalty corresponding to any violence employed. The criminal offense encompasses the following conducts:

- Subjection to **forced labor**, that is, any work or service exacted under threat of penalty and for which the worker has not voluntarily offered himself or herself;
- Subjection to **exhaustive working hours**, that is, any form of work which, by its duration or intensity, entails a violation of the worker's fundamental rights, particularly those related to safety, health, rest, and family and social life;
- Subjection to **degrading working conditions**, defined as any form of denial of human dignity through the violation of the worker's fundamental rights, particularly those related to labor protection standards and occupational safety, hygiene, and health;
- **Restriction of movement** by reason of debt contracted with the employer or agent (*truck system* or debt bondage); and
- **Retention at the workplace** through restriction of the use of means of transportation, overt surveillance, or seizure of the worker's personal documents or belongings (Article 149, § 1, Sections I and II, of the Criminal Code).



The crime is punishable by imprisonment of two to eight years and a fine, with an enhanced penalty when committed against a child, adolescent, elderly person, or person with a disability. Furthermore, **Article 149-A of the Criminal Code** independently criminalizes human trafficking for the purpose of subjecting individuals to working conditions analogous to slavery, demonstrating the breadth of Brazilian criminal law protection.

1.3. Labor Inspection and Administrative Enforcement

Brazil maintains a specialized labor inspection system under the **Ministry of Labor and Employment (MTE)**, through the **Secretariat of Labor Inspection (SIT)** and the **Regional Labor Superintendencies (formerly DRTs)**, with authority to:

- Conduct inspections throughout the national territory, including through the **Special Mobile Inspection Group**, established in 1995 and composed of Labor Inspectors, Labor Prosecutors, and Federal Police agents;
- Issue infraction notices and impose administrative fines;
- Order the immediate cessation of unlawful labor practices and proceed with the **rescue of workers**, including the issuance of unemployment insurance vouchers to rescued workers, pursuant to Article 2-C of Law No. 7,998/1990; and
- Refer the case files for criminal prosecution and for action by the **Labor Prosecution Service (MPT)**, which may initiate a civil inquiry, execute a Conduct Adjustment Agreement (TAC), or file a Public Civil Action seeking collective moral damages and the fulfillment of obligations.

Within the scope of the Secretariat of Labor Inspection, infraction notices issued are subject to administrative defense and appeal. Unfavorable administrative decisions rendered by the Regional Superintendencies and by the SIT, once final and unappealable, lead to the inclusion of the employer in the "Dirty List" and the imposition of an administrative fine. The employer may, however, file an Annulment Action of Inspection and Infraction Notices before the Judiciary, thereby ensuring the observance of due process and the right to a full defense at all levels.

Normative Instruction MTP No. 2/2021 further detailed the operative concepts used by labor inspection, defining: (a) forced labor as that which is exacted under threat of physical or psychological penalty and for which the worker has not voluntarily offered himself or herself or in which the worker does not wish to remain voluntarily; (b) exhaustive working hours as any form of work, whether physical or mental, which, by its duration or intensity, entails a violation of the worker's fundamental rights, particularly those related to safety, health, rest, and family and social life; (c) degrading working conditions as any form of denial of human dignity through the violation of the worker's fundamental rights, particularly those set forth in labor protection and occupational safety, hygiene, and health standards; and (d) restriction of movement by reason of debt as the limitation of the fundamental right of free movement or the right to terminate the provision of labor, by reason of a debt imposed by the employer or agent or the inducement of indebtedness with third parties. This Normative Instruction also provides that the Infraction Notice shall be conclusive regarding the finding of labor under conditions analogous to slavery, with a detailed and thorough description of the facts underlying the characterization.



Inspections may be triggered by means of: (a) organized task forces composed of the MPT, Regional Labor Superintendencies, and the Federal Police; (b) complaints, particularly from subcontracted workers; and (c) routine inspections. During the course of the inspection, site visits are conducted, photographs taken, interviews carried out, and documents seized. Upon finding labor under conditions analogous to slavery, workers are rescued and placed in a safe location, the employment contract is formally registered with the main company (when not previously formalized), the employment relationship is terminated, vouchers for withdrawal of the FGTS (Severance Indemnity Fund) and unemployment insurance are issued, and severance payments, outstanding contractual amounts, moral damages, and assistance for return to the worker's city of origin are paid. Following the issuance of infraction notices and delivery of the inspection report, the proceedings are forwarded to the Secretariat of Labor Inspection, the Labor Prosecution Service, the State Treasury Secretariat, and the Secretariat of Human Rights.

Within the scope of the Labor Prosecution Service, participation in the inspection entails the automatic initiation of a Civil Inquiry. When the MPT does not directly participate in the inspection, the inquiry may be initiated upon referral (from the SRTE, Ministries, Secretariat of Human Rights, or Labor Courts) or upon complaint (from workers or anonymous sources). In the inquiry, the MPT proposes the execution of a Conduct Adjustment Agreement (TAC), encompassing compliance with the irregularities identified in the infraction notices and, frequently, collective moral damages. In the absence of the execution of a TAC, the MPT files a Public Civil Action (ACP), the subject matter of which comprises the obligations proposed in the TAC, collective moral damages, and, potentially, the revocation of the state ICMS registration (applicable in the States of São Paulo, Minas Gerais, Paraíba, Bahia, Sergipe, Mato Grosso do Sul, Maranhão, Rio de Janeiro, and Amazonas). Following a collegiate condemnatory decision or a court decision recognizing the defendant's liability and/or upon becoming final and unappealable, the employer is included in the "MPT List".

In addition, Brazil maintains the **Registry of Employers Who Have Subjected Workers to Conditions Analogous to Slavery ("Dirty List")**, originally established by Ordinance No. 540/2004 of the MTE (currently governed by MTE Ordinance No. 15/2024), in which employers are listed following a final administrative decision concerning an infraction notice. Inclusion in this registry entails severe reputational and financial consequences, functioning as a powerful deterrent mechanism. The current regulations also provide for the possibility of executing a TAC for the remediation of damages, rectification of irregularities, and adoption of preventive measures, in which case the employer is removed from the "Dirty List" and included in the **Registry of Employers Under Conduct Adjustment (CEAC)**, demonstrating the system's concern with the rehabilitation of offenders and the effective eradication of unlawful practices.

The regulatory evolution of the Registry of Employers ("Dirty List") reveals the constant improvement of the system by the Brazilian State, as shown in the following timeline:

- **Ordinance No. 1,234/2003**: provision for biannual forwarding by the MTE to various Ministries and Secretariats of information on slave labor inspections;



- **Ordinance No. 540/2004:** revoked Ordinance 1,234/2003 and established the first “Dirty List” proper;
- **Inter-Ministerial Ordinance No. 2/2011:** revoked Ordinance 540/2004, maintaining the “Dirty List” on similar terms, but under an inter-ministerial ordinance format to confer greater institutional legitimacy;
- **Normative Instruction No. 91/2011:** regulated the procedures for slave labor inspections, including the requirements for issuing infraction notices and preparing inspection reports;
- **Ordinance No. 2/2015:** revoked Ordinance 2/2011, maintaining the “Dirty List” on similar terms, but introducing provisions on due process and the right to a full defense to confer “greater legitimacy” to the procedure;
- **Ordinance No. 854/2015:** established as a requirement for inclusion in the “Dirty List” the necessity of inserting, in all infraction notices, an express statement mentioning the possibility of the employer’s inclusion in the Registry of Employers.
- **Ordinance No. 4/2016:** revoked Ordinance 2/2015, establishing the possibility of executing a TAC for inclusion in List “B” and providing for the publication of the Registry at any time;
- **Normative Instruction No. 124/2016:** supplemented NI 91/2011 regarding inspection procedures and requirements for inclusion in the “Dirty List,” establishing, among others, the requirement for an Infraction Notice based on Article 444 of the CLT;
- **Ordinance No. 1,129/2017:** revoked provisions of Ordinance 04/2016. An attempt to create requirements related to the concept of slave labor and inspections. The effectiveness of this Ordinance was suspended by the Supreme Federal Court through Non-Compliance with Fundamental Precept Claims (ADPFs) Nos. 489 and 491, evidencing judicial control over any regulatory regression;
- **Ordinance No. 1,293/2017:** restored the rules prior to Ordinance 1,129/2017, re-establishing the concept of slave labor in its entirety;
- **Normative Instruction No. 139/2018:** revoked NI 91/2011, expanding the inspection rules and the concept of slave labor with the definition of an extensive illustrative list of situations that could constitute labor under analogous conditions;
- **Normative Instruction No. 2/2021:** further detailed the concept of slave labor, linking it to subjection to forced labor, exhaustive working hours, and degrading working conditions, with the presentation of an illustrative list of indicators. Disclosure of the “Dirty List” on the same terms as Ordinance 04/2016, which may occur at any time.
- **MTE Ordinance No. 15/2024:** provision for the execution of a TAC for the remediation of damages caused, rectification of irregularities, and adoption of preventive and promotional measures to avoid the occurrence of slave labor. Upon execution of the TAC, the employer is removed from the “Dirty List” but remains in the Registry of Employers Under Conduct Adjustment (CEAC).
- **MTE Ordinance No. 18/2024:** the main change concerns the expansion of the intersectoral approach to the “Dirty List,” with the involvement of the Ministry of Racial Equality. Maintenance of the possibility of executing a TAC with removal from the “Dirty List” and inclusion in the CEAC.

1.4. Financial Restrictions and Restrictions on Access to Public Contracts



The Brazilian legal system further imposes severe financial and commercial restrictions on employers listed in the “Dirty List,” namely:

- **Restriction of rural credit – Central Bank of Brazil and National Monetary Council:** BCB Resolution No. **140, of September 15, 2021**, provides that, for purposes of compliance with MCR 1-2-10, rural credit shall not be granted to any individual or legal entity listed in the Registry of Employers Who Maintained Workers Under Conditions Analogous to Slavery, established by the Ministry responsible for said registry, by reason of a final administrative decision concerning the infraction notice. Complementarily, **CMN Resolution No. 4,883, of December 23, 2020**, prohibits financial institutions from entering into or renewing, with resources from any source, rural credit operations, including the provision of guarantees, as well as rural leasing operations, with individuals and legal entities listed in the Registry of Employers Who Maintained Workers Under Conditions Analogous to Slavery, managed by a federal government body, by reason of a final administrative decision concerning the infraction notice;
- **Restriction in public procurement and government contracts:** Law No. 14,133/2021 (Public Procurement and Government Contracts Law), in its Article 14, Section VI, prohibits the participation in public tenders or the performance of contracts, for a period of five years, of individuals or legal entities judicially convicted, with a final and unappealable decision, for the exploitation of child labor or for subjecting workers to conditions analogous to slavery;
- **Revocation of the ICMS registration:** in several States of the Federation (such as São Paulo, Minas Gerais, Bahia, among others), state legislation provides for the revocation of the state ICMS registration in the event of a finding of labor analogous to slavery; and
- **Commercial and reputational repercussions:** inclusion in the “Dirty List” may result in the termination of commercial contracts, early maturity of financings, restriction of credit from financial institutions (including BNDES), and impossibility of participating in public and private tenders.
- **Autonomous state restrictions:** in addition to the revocation of the ICMS registration, certain States of the Federation have specific legislation to combat slave labor. By way of example, Law No. 21,573, of September 13, 2022, of the State of Goiás, prohibits any legal entity that has been convicted of practices analogous to slavery from contracting with the state public administration; and
- **Contractual clauses in the private sector:** Brazilian companies have increasingly included in their commercial contracts clauses that expressly prohibit the use, directly or indirectly, of child labor, slave labor, labor under conditions analogous to slavery, or labor under subhuman conditions, requiring their contractors to guarantee remuneration compatible with the minimum wage for the relevant category, working hours and conditions in compliance with applicable legislation, evidencing the internalization of anti-forced labor standards in private commercial relations.

1.5. International Commitments



Brazil is a signatory to a broad set of international instruments for combating forced labor, all of which have been fully incorporated into the domestic legal order:

- **ILO Convention No. 29** (Forced Labour, 1930), ratified by Brazil in 1957 (Decree No. 41,721/1957), which defines forced labor as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily”;
- **ILO Convention No. 105** (Abolition of Forced Labour, 1957), ratified by Brazil in 1965 (Decree No. 58,822/1966), which commits Member States to adopt effective measures for the immediate and complete abolition of forced labor;
- **United Nations Slavery Convention** of 1926, as amended by the 1953 Protocol, and the Supplementary Convention on the Abolition of Slavery of 1956, ratified by Brazil in 1966 (Decree No. 58,563/1966);
- **American Convention on Human Rights** (Pact of San José, Costa Rica, 1969), ratified by Brazil in 1992 (Decree No. 678/1992), Article 6 of which prohibits slavery and servitude in all their forms;
- **International Covenant on Civil and Political Rights** (1966), ratified by Brazil in 1992, which prohibits, in its Article 8, all forms of slavery;
- **Palermo Protocol** (2000), ratified by Brazil in 2004 (Decree No. 5,017/2004), concerning the prevention, suppression, and punishment of trafficking in persons, particularly for the purpose of labor exploitation.

All of these instruments have been fully incorporated into Brazilian domestic law and are consistently applied by administrative and judicial authorities, reinforcing Brazil’s commitment to the eradication of forced labor in all its forms.

2. Public Policies and Inter-Institutional Actions to Combat Forced Labor

Beyond the normative framework, Brazil has developed a solid institutional structure to combat forced labor, involving the coordinated action of multiple agencies:

- **National Commission for the Eradication of Slave Labor (CONATRAE)**, linked to the Secretariat of Human Rights, which brings together the principal institutions involved in combating slave labor and coordinates the execution of the National Plan for the Eradication of Slave Labor;
- **Labor Prosecution Service (MPT)**, with authority to initiate civil inquiries, execute Conduct Adjustment Agreements (TAC), and file Public Civil Actions, including claims for collective moral damages and revocation of the state ICMS registration;
- **Federal Courts**, with jurisdiction over the crime of reducing a person to a condition analogous to slavery, as recognized by the Supreme Federal Court, pursuant to Article 109, Sections V and VI, of the Federal Constitution;



- **National Pact for the Eradication of Slave Labor**, launched in 2005 by the Brazilian business community in conjunction with civil society, with the adherence of more than 180 companies and associations, including major supermarket chains, industrial and financial groups, monitored by the Social Observatory Institute.
- **Legislative Branch action**: in the past, Parliamentary Commissions of Inquiry (CPIs) were established at the federal and state levels to investigate complaints of labor under conditions analogous to slavery, with legal representatives of companies being summoned to testify at public hearings, which demonstrates the mobilization of multiple branches of government in addressing the issue;
- **Overview of the integrated multi-institutional action of the Brazilian State**: the fight against slave labor in Brazil involves the coordinated action of multiple bodies at the federal and state levels, as shown in the following organizational chart:

FEDERAL LEVEL:

- ↳ **Federal Executive Branch** → Ministry of Labor and Employment → Regional Labor Superintendencies → Secretariat of Labor Inspection → Infraction Notices → Inclusion in the “Dirty List”
- ↳ **Federal Legislative Branch** → Chamber of Deputies → Parliamentary Commissions of Inquiry (CPIs)
- ↳ **Judiciary** → Labor Courts → Public Civil Actions and Individual Labor Claims
- ↳ **Labor Prosecution Service (MPT)** → Civil Inquiries → Public Civil Actions → Inclusion in the “MPT List” / Revocation of ICMS Registration

STATE LEVEL:

- ↳ **State Executive Branch** → State Revenue Secretariats / State Treasury Secretariats → Revocation of state ICMS registration
 - ↳ **State Legislative Branch** → State Legislative Assemblies → Parliamentary Commissions of Inquiry (State CPIs)
- **Extrajudicial repercussions as a deterrent factor**: beyond the legal and administrative sanctions, the finding of slave labor practices entails severe extrajudicial repercussions, including inquiries by media outlets and broad public exposure, as well as inquiries from business partners — suppliers, service providers, and clients — and regulatory bodies, which may lead to the termination of contracts, early maturity of financings and loans, credit restrictions, and impossibility of participating in tenders. These reputational repercussions function, in practice, as a powerful additional deterrent mechanism.

This set of inter-institutional actions demonstrates that Brazil not only has robust legislation but also effectively implements enforcement, repression, and prevention mechanisms against forced labor, with the involvement of multiple spheres of government and the private sector.

3. Responsibility and Commitment of the Brazilian Chemical Industry



The Brazilian chemical industry operates under rigorous legal, regulatory, and *compliance* obligations. ABIQUIM and its member companies reaffirm their **full commitment to compliance with all applicable labor legislation**, including:

- National labor and social security legislation, including the Consolidation of Labor Laws (CLT) and social security legislation;
- Regulatory standards on occupational health and safety;
- Collective bargaining agreements and union agreements;
- Human rights principles and responsible business conduct principles, in alignment with the guidelines of the ILO, the United Nations Global Compact, and the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy.

ABIQUIM actively participates in national and international initiatives to combat forced labor, acting in coordination with entities such as the **National Confederation of Industry (CNI)**, the **councils of the Federation of Industries of the State of São Paulo (FIESP)**, and international organizations, in the promotion of good business practices, the awareness of its members, and cooperation with the competent authorities. The association promotes, among its members, *compliance* policies and codes of conduct that expressly prohibit forced labor at all stages of the production chain, in line with the ILO recommendations for employers' organizations.

4. Structural Characteristics of the Chemical and Petrochemical Sector

The chemical and petrochemical industries are characterized by **highly capital-intensive and technologically advanced production systems**, which inherently reduce exposure to forced labor risks. The most relevant characteristics include:

- **High levels of automation and process control:** operations are based on advanced digital systems, continuous monitoring, and industrial automation, requiring a highly qualified workforce for the operation and maintenance of equipment;
- **Low labor intensity:** the sector employs a relatively small number of workers per production unit, the majority of whom are specialized technical professionals, engineers, chemists, and operators with specific training;
- **Rigorous safety and operational requirements:** the operational safety, health, and environmental requirements in the chemical sector are incompatible with informal, precarious, or forced labor arrangements, given the nature of the production processes and the risks involved;
- **Formalized and regulated employment relationships:** the chemical industry operates with formal employment relationships, with registration in the Work and Social Security Card (CTPS), remuneration consistent with collective bargaining agreements, and full compliance with labor and social security obligations.



As a result, chemical and petrochemical industrial units **do not constitute labor-intensive environments** and do not depend on vulnerable or low-skilled workers typically associated with forced labor risks. The productive characteristics of the sector are, by their nature, structurally incompatible with forced labor practices.

5. Conclusion

Brazil maintains a **robust and multifaceted** legal framework for preventing and punishing forced labor, underpinned by constitutional guarantees, severe criminal sanctions (including imprisonment of two to eight years), a specialized and active labor inspection system (with the Special Mobile Inspection Group and the coordinated action of the MPT), effective deterrent mechanisms (such as the “Dirty List,” the Registry of Employers Under Conduct Adjustment — CEAC, credit restrictions, public procurement prohibitions, and revocation of the state ICMS registration), international commitments fully incorporated into domestic law, and a track record of constant regulatory improvement, as evidenced by the extensive legislative evolution from Ordinance 1,234/2003 to Ordinance 15/2024, including judicial oversight by the Supreme Federal Court in cases of attempted regulatory regression (ADI 5209, ADPFs 489 and 491).

The Brazilian chemical industry fully complies with these laws and operates under **highly automated and technology-intensive production models** that are structurally incompatible with forced labor practices. The sector does not depend on vulnerable or low-skilled labor and maintains fully formalized employment relationships, with full respect for labor and social security standards.

ABIQUIM and its member companies reiterate, before the USTR, their firm and unequivocal commitment to **ethical conduct, full compliance with labor legislation, and continuous cooperation with national and international authorities** in the global effort to eradicate forced labor. This submission aims to demonstrate, in a substantiated and documented manner, that the Federative Republic of Brazil, and in particular the national chemical sector, has effective and active legal, administrative, and institutional instruments to combat forced labor, in full compliance with the international obligations undertaken by the country.

In light of the foregoing, ABIQUIM makes itself available to the USTR to provide any additional clarifications that may be necessary and requests that this submission be duly considered within the scope of the proceeding initiated under Section 301 of the *Trade Act of 1974*.

Respectfully,

André Passos Cordeiro

**EXECUTIVE PRESIDENT OF
BRAZILIAN CHEMICAL INDUSTRY ASSOCIATION (ABIQUIM)**



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