CONFLUENCE OR SUBMISSION OF INTERESTS? CORRUPTION AS AN EXPRESSION OF THE ACTION OF PUBLIC AGENTS ALLIED TO MAJOR CORPORATIONS

CONFLUÊNCIA OU SUBMISSÃO DE INTERESSES? A CORRUPÇÃO COMO EXPRESSÃO DA AÇÃO DOS AGENTES PÚBLICOS ALIADOS ÀS GRANDES CORPORAÇÕES

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Abstract: Given the outbreak of large cases of corruption in recent decades, it is necessary to address the relationship between public agents and business organizations in Brazil. The problem in question lies in the distancing from the public interest in these relationships. From this perspective, the objective is to discuss corruption as an expression of State action in collusion with private companies. The selected methodology was the bibliographical research, of a qualitative nature. The results pointed to several administrative corruption scandals in Brazil in recent decades. Thus, the conclusion reached is that, normally, these relationships do not converge for the common good, considering that public agents are submissive to the interests of large companies.

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Keywords: Confluence; Submission of interests; Corruption; Public entities; Large corporations.

Resumo: Diante da deflagração de grandes casos de corrupção nas últimas décadas, faz-se necessário abordar a relação entre agentes públicos e organizações empresariais no Brasil. O problema em questão reside no distanciamento do interesse público nessas relações. Nessa perspectiva, o objetivo é discutir sobre a corrupção como expressão da ação do Estado em conluio com empresas privadas. A metodologia selecionada foi a pesquisa bibliográfica, de cunho qualitativo. Os resultados apontaram diversos escândalos de corrupção administrativa no Brasil nas últimas décadas. Assim, a conclusão alcançada é de que, normalmente, essas relações não confluem para o bem comum, tendo em vista que os agentes públicos são submissos aos interesses das grandes empresas.

Palavras-chave: Confluência; Submissão de interesses; Corrupção; Entes públicos; Grandes corporações.

SUMMARY: Introduction. 1 Brief Considerations about the phenomenon of corruption. 2 Corruption in the scope of public administration. 3 Corruption in the relationship of public agents with large corporations. Conclusion. Bibliography.

INTRODUCTION

The Federal Constitution of 1988, as well as the infra-constitutional legislation, establishes the guiding principles of Public Administration.

Among the precepts that govern the behaviour of public agents, there is morality, which consists of the ability to differentiate between legal and illegal conduct, the correct act from the incorrect. It is noteworthy that morality encompasses the notion of probity, imposing on the state agent a posture in accordance with universally agreed ethical and moral rules.

In this context, the objective of the present study is to analyse the behaviour of public agents in the relationships maintained with large corporations.

The problem in question resides in the fact that, in recent decades, cases of corruption involving the Public Administration and its agents in association with business organizations have exploded.

The hypothesis to be investigated is that public agents are not acting to guarantee and maintain the common good, distorting the public interest to obtain undue advantages and meet the interests of private institutions.

To do so, a qualitative bibliographic research was used as a methodology, carrying out a literature review that is necessary to gather and analyse information from scientific productions in the area of Public Law.

In order to provide a more didactic and harmonious reading, the work was structured in three sections. Initially, brief considerations will be made about the phenomenon of corruption. Then, an analysis of corruption within the Public

Administration will be carried out. And finally, in the last section, corruption in the relationship between public officials and large corporations will be discussed.

1 BRIEF CONSIDERATIONS ABOUT THE PHENOMENON OF CORRUPTION

Initially, for a better understanding of corruption within the Public Administration, it is worth making brief comments on the phenomenon of corruption.

According to Garcia (2003, p. 103) etymologically, the word corruption comes from the "Latin *rumpere*, equivalent to breaking, dividing, generating the word *corrumpere*, which, in turn, means deterioration, depravity, alteration".

For instance in the lessons of Costa and Mazzardo (2014, p. 197-198), "the substratum of the term corruption is linked to the action or effect of corrupting, summarily, a cause to degenerate". In other words, it is the "act of seducing for a certain value, which can be a monetary amount, valuable gifts, benefits of various types or any goods that reflect a gift to someone and that leads them to deviate from correct conduct, conventionally called corruption".

From the perspective of human behaviour, corruption consists of the action that degrades and destroys something or someone.

As Zanini (2014, p. 14) teaches, corruption reflects "the moral rottenness in view of the opposition to ethical principles of a given society". Furthermore, it is also a conduct "that comes from the inside out, a deterioration of the individual or groups of individuals towards society.

Corruption is a universal evil that resembles cancer. This is because, even if faced with commitment and apparently contained, at any moment it can infect another organ. Then, another fight begins and again the evil is suffocated, but it doesn't take long for the metastasis to settle in and change the location of the affection (Garcia, 2003).

Corruption, in its most varied forms, is a phenomenon that has always been observed in the course of human history.

Rizzardo (2014, p. 488) explains that "in the beginnings of civilizations, the power of the heads of governments did not suffer control over public patrimony, so much so that it was considered the property of the crown or of kings and tyrants". At various times, "private property and even freedom were considered concessions by the king. More appropriately, the monarch's patrimony was

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confused with that of the state, leading to confusion between the *res publica* and the *res principis*".

Thus, corruption is a behaviour that has always been present in the history of humanity, and in recent years it has no geographical limits, reaching all countries in the world without distinction (Pereira Remedio; Antonio Remedio, 2018).

Regarding Brazil, it is speculated that corruption took root at the time of colonization, establishing a patrimonial culture. Brazilian corruption originates in the bowels of the colonization process, considering that the explorer had only one purpose, which was to obtain wealth at any cost, dominating the colony that was only useful to meet the will of the class that reached power (Zanini, 2014).

This patrimonial culture remained even after the Proclamation of the Republic, as reported by Filgueiras (2009, p. 388):

> It is assumed that the Brazilian political tradition does not respect the separation between the public and the private, not being, in the Brazilian case, an example of a modern State legitimized by impersonal and rational norms. Patrimonialism is the evil of the construction of the Republic, so that it would not promote the separation between the means of administration and the officials and rulers, making them have privileged access to the exploitation of their positions and positions. Given the patrimonialism inherent to the construction of the Brazilian public scene, corruption is a type of daily practice, even being legitimized and explicit within the scope of a status and traditional tradition inherited from the Iberian world.

This *modus operandi* has been reproduced over the centuries, remaining ingrained in the political-administrative structure of the country, as will be seen below.

2 CORRUPTION IN THE SCOPE OF PUBLIC ADMINISTRATION

Corruption is an universal evil that spreads, with greater or lesser frequency, in different scenarios and sectors of society. Unfortunately, corruption ended up invading the State, through the conduct of people who neglect the principles and values that should guide public activity (Zanini, 2014).

Corruption is the ingredient that brings together the most deleterious actions to the public service, not to mention the degradation of the agent's character (Garcia, 2003). It is undeniable that corruption maintains an intrinsic relationship with administrative improbity and the mismanagement of public affairs.

Soares and Pereira (2015, p. 2) clarify that corruption is "the most serious behaviour that the administrator can commit; it is the most serious facet of improbity, which, in turn, is inserted in the larger sphere of mismanagement of public affairs".

A common aspect between these behaviours is morality, which was raised to the level of a guiding principle of the Administration by art. 37, caput, of the Federal Constitution of 1988: "the direct and indirect public administration of any of the Powers of the Union, the States, the Federal District and the Municipalities shall obey the principles of legality, impersonality, morality, publicity and efficiency".

According to Mendes and Branco (2021, p. 986):

> one should seek to rescue a legal content of the principle, recognizing that the State does not owe obedience to any morality, but only to that shared in the specific political community. Thus, considering that the Public Administration should be guided by obedience to the constitutional principles directed to it expressly but also to other fundamental principles, it is that, in its performance, it must be able to distinguish the fair from the unfair, the convenient from the inconvenient, the timely from the inopportune, in addition to the legal from the illegal.

As Di Pietro (2020, p. 1826) well teaches:

> the inclusion of the principle of administrative morality in the Constitution was a reflection of the concern with ethics in Public Administration and with the fight against corruption and impunity in the public sector. Until then, administrative improbity constituted an infraction provided for and defined for political agents. For others, only illicit enrichment in the exercise of office was punished.

Morality can be understood as an administrative meta-principle, whose extension of the notion, in a broad sense, involves the precept of probity, characterized by acting in accordance with the ethical and moral dictates required as rules by universal understanding (Rizzardo, 2014).

It is worth mentioning the peculiar relationship between the meanings of morality and probity, associated with ethics, good faith, honesty, and good customs that must be preserved by the public agent, including in the relationship with individuals.

Administrative probity is a form of administrative morality, which consists of the obligation inherent to the public agent to protect himself from taking advantage of the powers or facilities arising from the function, either for personal

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benefit or for someone he wishes to favour. In other words, the agent must serve the Public Administration with honesty (Silva, 2001).

According to the lessons of Di Pietro (2020, p. 1825):

> It is not easy to distinguish between administrative morality and administrative probity. Strictly speaking, it can be said that they are expressions that mean the same thing, given that both are related to the idea of honesty in Public Administration. When administrative probity or morality is required, this means that formal, restricted legality of administrative action, in compliance with the law, is not enough; it is also necessary to observe ethical principles, loyalty, good faith, rules that ensure good administration and internal discipline in the Public Administration.

In this sense, administrative corruption can happen when state agents act with bad faith and dishonesty in dealing with public affairs, practicing acts that are not only immoral, but above all illegal, in flagrant violation of administrative probity. In fact, the practice of any act contrary to administrative probity configures the so-called administrative improbity (Araújo; Lopes, 2020).

Following this line of reasoning, Rizzardo (2014, p. 359) conceives the meaning of improbity as "the opposite of probity, that is, the term contains the sense of dishonesty, misconduct, bad nature, bad character, lack of integrity, rectitude of character, the action that violates public morality, the conduct of one who does not behave well".

Complementing, Rizzardo (2014, p. 477) teaches that the act of improbity, in general, "affects the treasury and reveals itself above all in the misuse of power or misuse of purpose, in the abuse of rights, in the misuse of power, in carrying out acts in disagreement with the purposes that determine it, in the misappropriation of public money and administrative corruption".

Thus, when the public agent disrespects administrative probity, corruption appears from the angle of administrative improbity, especially in relation to actions that constitute illicit enrichment.

Pazzaglini Filho (2002, p. 16) understands that corruption is an expression that is legally equivalent to administrative improbity, consisting of the "exercise of public service with disregard for the express and implicit constitutional principles that govern Public Administration".

Already in the lessons of Garcia (2003, p. 104), corruption "configures only one of the faces of the act of improbity, which has a broader spectrum, encompassing conduct that could not be easily framed under the heading of acts

of improbity of corruption". Indeed, it is clear that "improbity and corruption are related to each other as genus and species, the latter being absorbed by the former".

In addition to morality and administrative probity, state agents have a duty to act in accordance with the public interest, which must prevail over the interest of the individual.

The supremacy of the public interest over the private interest consists of the governing principle of Public Administration, also called by the doctrine of the principle of public purpose, based on art. 2, caput, of Law no. 9,784/1999:

> Art. 2 The Public Administration will obey, among others, the principles of legality, purpose, motivation, reasonableness, proportionality, morality, ample defense, contradictory, legal certainty, public interest and efficiency.
>
> Single paragraph. In the administrative processes, among others, the criteria of:
>
> Sole paragraph. Administrative proceedings shall observe, among others, the criteria of:
>
> I - performance in accordance with the law and the Law;
>
> II - serving the ends of general interest, being forbidden the total or partial waiver of powers or competencies, except when authorized by law.

According to Meirelles and Burle Filho (2015, p. 113), "the primacy of the public interest over the private is inherent to state action and also dominates it, insofar as the existence of the State is justified by the pursuit of the general interest, that is, of the collectivity; not of the State or the apparatus of the State".

The public interest is a way to achieve social justice, the common good, the collective well-being. It is a principle that serves as a basis for the elaboration of public law norms and binds the Public Administration in all its decisions (Di Pietro, 2020).

From this perspective, corruption within the Public Administration can occur when state agents do not comply with the legal obligation to act in the public interest in order to meet private interests.

According to Zanini's conception (2014, p. 15), corruption comes from acts of public or political agents "which end up being contrary to the common interest of society and what has been legally established".

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This means that one of the characteristic elements of corruption in the public sphere is the illegal use of public services, goods, powers and/or interests for private purposes (Nascimento, 2014).

In this way, when the public agent diverts the public interest to meet a particular interest, corruption reflects one of the facets of mismanagement of public affairs through the prism of dishonesty.

The mismanagement of public affairs is marked by the violation of the ethical duty to care for the *res publica*, so that every administrator must act in the public interest, which translate the will of the people. Violation of this assignment may occur through inefficiency or dishonesty. Bad management is configured as inefficient when the administrator's behaviour does not achieve the expected result, either due to incompetence or inability. In other hand, bad management will be dishonest when there is a lack of honesty and modesty in the administrator's actions (Soares; Pereira, 2015).

Dishonest management of public affairs is associated with corruption, as this conduct, according to Garcia (2003, p. 104), "indicates the use or omission, by the public agent, of the power that the law has granted him in search of obtaining an undue advantage for itself or for third parties, relegating to a secondary level the legitimate purposes contemplated in the rule". It is observed, therefore, that "misuse of power and illicit enrichment are characteristic elements of corruption".

Despite the similarities, corruption is in a less comprehensive field than mismanagement and improbity, as explained by Soares and Pereira (2015, p. 3):

> [...] one can consider mismanagement as a fact that is more comprehensive than improbity and the latter, in turn, more comprehensive than corruption. The three spheres are related to the extent that every act of corruption is also improbity and also an act of mismanagement. However, this symbiosis is relative, because not all mismanagement is improbity, nor is all improbity corruption. [...]. To facilitate understanding, it is useful to launch the following figure here, of three circles, arranged concentrically, one inside the other. The biggest one is the mismanagement of public affairs, the second biggest and the one involved is the administrative improbity, and the smallest and central one is the one corresponding to corruption. What is intended to demonstrate is that mismanagement is something greater that involves improbity and corruption. In this line, not every act of the bad manager will be improbity or corruption. In turn, not every act of improbity will be corruption. And finally, every act of corruption will have a character of improbity and mismanagement, and every act of improbity will also be of mismanagement.

It should also be noted that the national legal system treats corruption within the Public Administration as a criminal offense whose legal interest is administrative probity and public interest.

Among the crimes committed by a public agent against the Public Administration, the crime of passive corruption stands out, typified by the conduct of "requesting or receiving, for oneself or for others, directly or indirectly, even if outside the function or before assuming the position". there, but because of it, an undue advantage, or accept a promise of such advantage", in the form of art. 317 of the Brazilian Penal Code.

On the other hand, among the crimes committed by individuals against the Public Administration, there is the crime of active corruption, typified by the conduct of "offering or promising an undue advantage to a public official, in order to determine him to practice, omit or delay an act of letter", pursuant to art. 333 of the Brazilian Penal Code.

Therefore, corruption can be practiced by state agents together with individuals or legal entities governed by private law, as will be seen below.

3 CORRUPTION IN THE RELATIONSHIP OF PUBLIC AGENTS WITH LARGE CORPORATIONS

In recent decades, Brazil has been negatively marked by several corruption scandals that have taken place in the political-administrative scenario.

Rizzardo (2014, p. 494) clarifies that "poor administration, the diversion of goods and public corruption have always accompanied the history of the country, with advances or resurgence at certain times". The rulers change and "new fronts of attack on the public treasury appear, in a perennial cyclical repetition of scandals that cry out for concrete remedial measures, and which, unfortunately, do not always appear".

As Pereira Remedio and Antonio Remedio (2018, p. 111) well recall:

> [...] from the 1990s onwards, we had rumored cases of corruption, with the embezzlement of billions of reais from the public purse, such as the Jorgina de Freitas Case, the Budget Anões Scandal, the Sivam Scandal, the Luís Estevão, Operação Anaconda, the Mensalão Scandal, the Mensalão Mineiro Scandal, the Correios Scandal, the Siemens Case, the Alston Case and the Petrobras Case.

The impacts of corruption are harmful, hindering the provision of services and the social obligations of the State, which makes essential segments unfeasible

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for the citizen, such as security, health, education, housing, food, among others (Costa; Mazzardo, 2014).

Given this, it assumed that a change in the country's political-administrative structure could solve the problem of corruption.

In the opinion of Filgueiras (2009, p. 391), this ended up linking corruption to the State and, consequently, producing the belief that "the correction of the delinquencies of the Brazilian public man would go through the change of the administrative machine, and not of the values and practices" present in society".

The news published in the major communication media calls for the adherence to stricter measures, which effectively combat acts of corruption and the improper use of public affairs and the evils arising therefrom, in accordance with the high rates that express the firm and majority indignation of the society (Costa; Mazzardo, 2014).

However, public opinion cannot be generalized in the sense that every public agent is suspect, that he is inclined to obtain undue benefit for himself or others or that he acts to deprive the public good. The benevolence towards corruption is as harmful to the country as the culture of corruption that is presumed due to the news published in the press (Rizzardo, 2014).

Despite this, corruption is not only a misconduct of the public agent, it is also a spread disease that affects the State, due to the private initiative.

As Almeida Neto (2015, p. 8) highlights, there is an obvious logic: "there is no corrupt without corruptors". Despite the obviousness, the common repudiation of corruption is usually concentrated on state agents, who are distorted in the face of the benefits offered to them.

According to the lessons of Garcia (2003, p. 117), "corruption, based on the relationship established between the corruptor and the corrupted, seeks to minimize costs and maximize opportunities. From this perspective, corruption presents itself as a means of degrading the public interest in benefice of the satisfaction of the private interest".

Thus, corruption presupposes the participation of individuals and legal entities not linked to the State, who seduce and are seduced by state agents in order to obtain an undue advantage.

According to Costa and Mazzardo (2014, p. 196-197), we have:

> When it comes to corruption, whether in the national or international reality, the biggest and most recurrent outbreaks gravitate in the orbit of public services and hiring, financing of electoral campaigns and

the performance of civil servants, corrupting and causing irreparable damage, both to institutions and people. [...] Mainly, in relation to the Brazilian state sphere, the misuse of power by public and political agents stands out, who, par excellence, abuse the faculty that the law grants them to obtain undue advantages for themselves. or to third parties, through influence peddling, or even in blatant omission of their duties, relegating the legitimate purposes objectified in the rules through the diversion of power and public resources, dishonest enrichment and undue favoritism, illicit and criminal practices that characterize the corruptive action.

From the point of view of corruption involving individuals, there are several ways for the public agent to corrupt the individual and, consequently, there are many hypotheses of corruption. In fact, with the consolidation of press freedom, more frequently, news revealing corruption scandals involving politicians and businessmen, even those considered powerful and untouchable (Zanini, 2014).

When practiced in collusion between the public agent and an individual, it is observed that there is a deviation from the public interest in favour of a simultaneous private interest, that is, one that at the same time produces an undue benefit for both. Indeed, the individual will be inclined to practice the corrupt act for the faster or less expensive achievement of his private interest, even if the public interest is harmed (Garcia, 2003).

However, in general, corruption scandals arise from the relationship between the main public or political agents, due to the high power they have, with large corporations, in view of their high financial capacity.

Even because, practices in public activity are different from those employed in the private sphere, so that public institutions have non-profit purposes and value the inherent rights of the community, while private institutions operate through commercial parameters based on profitability and competitiveness (Costa; Mazzardo, 2014).

For this reason, as a rule, corruption is provoked by groups with pressure power to act systematically with the State to achieve their ends, choosing this path, especially when they are unable to obtain results in a lawful way (Garcia, 2003).

What is currently observed is a scenario of major corruption scandals involving private actors at the international and national levels. It is notorious the growth in the number of cases involving large corporations in the problem of corruption, and the importance of building mechanisms that prevent this practice, ceasing to become attractive for these institutions (Azevedo; Fernandes, 2017).

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The main reason that explains the involvement of large companies in corruption cases is their financial power, which ends up drawing the attention of public agents inclined to this practice, who see a chance to obtain substantial economic benefits.

As Garcia (2003, p. 117) teaches, "the greater the relevance of the interests that the public agent may have in exchange for the benefits offered to him, the greater the social cost of his conduct".

According to Costa and Mazzardo (2014, p. 206):

> While these facts are printed in periodicals of high national circulation, what can be noticed is that corrupt managers, politicians and businessmen continue their script: they enrich themselves illicitly; they act politically in an unscrupulous way, use the public machine for their own benefit; if they use the public good instead of serving the population; Public positions are filled by elements appointed by the well-known "godfathers". What is witnessed - even after the constitutional institute of 1988 - is the total dismantling in relation to public interests and goods. The disrespect for the basic principles of public administration (legality, morality, impersonality, publicity, efficiency, morals and ethics) is notorious.

It is a symbiotic relationship, where the administrator uses his powers and the public machine to receive undue benefit, while the company uses these attributions and the public thing to obtain an illicit advantage.

At the heart of this relationship is ambition and selfishness, as well as the maintenance of power and/or facilities, departing from the notion of the public good or conventional morality (Zanini, 2014).

As reported by Azevedo and Fernandes (2017, p. 647), from the perspective of the state agent, corruption usually takes place through "incentive systems", such as bribery and kickbacks, in order to serve private interests.

About this, Garcia (2003, p. 117) elucidates that:

> The forms of corruption not only tolerated but encouraged in the business environment - present multiple variations. Among the most common, the following can be mentioned: a) the delivery of gifts to public agents that in some way can benefit the company in the exercise of its function; b) the disproportionate hospitality in the reception of public agents; c) defraying expenses incurred by such agents; d) the provision of free travel, etc. Corruption can also manifest itself as a projection of the alliances that allowed the public agent to rise to power. In such cases, the benefits received by the agent preceded the actual exercise of

the public function, but will generate reflexes in the final activity to be developed by him later. This is true deferred corruption, in which the advantage received in the present will distort the administrative activity in the future.

On the other hand, for large companies, corruption is often seen as a necessary evil. It is a possibility to make a profit, in addition to maintaining or increasing your position in a competitive market.

It is a practice, for example, that makes it possible to previously eliminate or reduce possible competitors in a bidding process. In other cases, the company is favored by employing inferior resources or delivering less than what was contracted to maximize its gains (Almeida Neto, 2015).

Following this line of reasoning, Garcia (2003, p. 116) clarifies that:

> From the business point of view, corruption is usually seen as a necessary instrument to maintain one's own competitiveness among those who work in an admittedly corrupt environment. Those who abdicate corruption will find themselves in a position of inferiority in relation to competitors who use this mechanism, and it is even possible to exclude them from the competition itself (e.g. public agency whose agents frequently rig their bids or who demand a percentage of the object of the contract for its award, it will only allow the competition to be won by a company that fits the corruption scheme). The contractor benefited by acts of corruption, often fails to meet the technical requirements required for the case and fails to perform the best service, because the cost of corruption will have to be transferred to the execution of the contract, which will result in performance with quantity or quality inferior to that contracted.

In any case, corruption directly and negatively affects the Public Administration, in view of the significant amounts diverted from the public coffers, in addition to undermining the credibility of public institutions (Pereira Remedio; Antonio Remedio, 2018).

The most regrettable and serious fact is knowing that this practice is fed by state representatives, who should maintain relations with the private sector without neglecting public interests.

However, what has been observed is that corruption has become habitual in the Public Power, and those whose duty is to preserve the common good are submitting to the spurious interests of business organizations.

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CONCLUSION

Corruption is a historical and multifaceted phenomenon, observable from the dawn of humanity to nowadays, in the most diverse social, economic, political, geographic and cultural contexts.

> We already said…, BANDEIRA, 2022, p 143: «Corruption is closely linked to the experience of the police, with obvious consequences for discretion and selection. Assuming different postures depending on the country in the world, corruption is sometimes linked to police corruption itself (…). A kind of bacchanal between organized crime, police and politics. No wonder, therefore, that Magistrates can also be involved (see news). Thus, "corruption is a game in which all actors seek to profit" (H. Goldstein). It is no coincidence that victimless crimes are a haven for corruption. "It's just that prohibited practices don't harm anyone." Ecce homo».

In the last decades, what was observed in Brazilian territory was corruption within the Public Administration, more specifically resulting from the relationship between public agents and large corporations.

It is true that not all relations between the Public Power and business organizations are tainted by corruption. In certain cases, state agents act according to the principles and values that guide the Public Administration, respecting public interests.

However, given the scandals of administrative corruption that took place in Brazil, covering several public agents, especially those at the highest level of hierarchy, it is observed that, occasionally, these relationships do not converge to the common good, as public agents submit to the interests of business organizations in exchange for benefits.

The perception is that the action of the public agent in the relationship with large corporations is being marked by the intention to use their powers and the public thing to obtain, for themselves or for others, an undue advantage. On the other hand, large companies use their prestige and financial power to seduce state agents, offering undue advantages to themselves and/or people close to them.

Thus, it is necessary to rethink the way in which state agents act when, on behalf of the Public Administration, they engage with business organizations, in order to preserve administrative probity, ethics, honesty, good faith and good customs, because, only in this way, it is possible to reach the public interest.

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