NCP Annual Reporting Questionnaire 2019

PROPOSED AMENDMENTS TO THE ANNUAL REPORTING QUESTIONNAIRE FOR NCPS

NATIONAL CONTACT POINT REPORTING QUESTIONNAIRE (2019)

This questionnaire is designed to help National Contact Points fulfil their reporting obligations as described in the Procedural Guidance of the OECD Guidelines for Multinational Enterprises. The answers to the questions should reflect the nature and re

sults of the activities of the NCP[1].

STRUCTURE

This questionnaire comprises 61 questions and 2 annexes under the following headings:

A. Contact information
B. Institutional arrangements
C. Information and promotion
D. Specific instances
E. Peer learning and peer reviews
F. Policy coherence
G. Challenges
Annex 1: NCP PROMOTIONAL ACTIVITIES
Annex 2: SPECIFIC INSTANCES

TYPES OF QUESTIONS

1. **Questions with predefined answers**
    For most questions, a pre-defined set of answers are provided in a drop-down menu (e.g. Yes-No-N/A). For each of these questions, please select the appropriate answer in the dropdown menu.

Example:

(b) Promotional activities	
19. Did the NCP organise or co-organise events to promote the Guidelines and/or the NCP during the year? *If yes, please provide details in table 1 in Annex 1.*	Yes/No

2. **Open-ended questions**
a) Some questions are open-ended, and in these cases an answer box is provided. Many of these questions are meant to complement a question with predefined answers. Please keep responses precise and short.

Example:

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(b) Advisory body	
5. Does the NCP have one or several advisory bodies?	Yes/No
If the NCP has several advisory bodies, please specify.	Click here to enter text.

b) "Additional comments" boxes are situated at the end of each section. Please feel free to enter any additional information you would like to share in these boxes.

Example:

Additional comments on **Advisory body**
Click here to enter text

TERMS USED IN THE QUESTIONNAIRE

A number of terms are used throughout the questionnaire. Definitions are provided below. Please note that these definitions are exclusively intended to assist in clarifying the terms used in this questionnaire. These terms will be underlined the first time they are used in this questionnaire.

- **Structure of the NCP:** The organisational set up of the NCP. Four NCP structures have been pre-identified, but other arrangements are possible:
  - Single-agency: The NCP is composed of one individual in a single ministry, or by a group of individuals belonging to the same service in the same ministry.
  - Inter-agency: The NCP is composed of a group of representatives from several ministries or government agencies.
  - Expert-based: The NCP is composed of experts who are external to government.
  - Multipartite: The NCP is composed of a group of government officials and stakeholder representatives.
- **Secretariat**: Government officials or group of government officials acting as the permanent office of an NCP.
- **Advisory body:** Some NCPs have an advisory body which can be consulted by the NCP on a range of activities and issues on which it provides advice. Advisory bodies can include representatives from trade unions, NGOs, business and/or academia, along with representatives of other government ministries or agencies. They do not normally form part of the NCP and do not have decision-making power on accepting or concluding specific instances. Some advisory bodies also provide oversight to the NCP (see below).
- **Oversight:** Monitoring of the NCP's activities performed by an Advisory body, for example on whether the NCP has followed its own rules of procedures.
- **Dedicated budget:** A budget that is allocated to the NCP on a regular basis (e.g. every year) to carry out its functions and activities.
- **Reporting:** In addition to the present report to the OECD, some NCPs provide a regular account of their activities to their national government or parliament. This reporting can take several forms: ongoing

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through regular reporting channels, or through the presentation of a periodic report, which may be made public.

- ▪ **Stakeholder meeting:** A stakeholder meeting is a meeting organised by the NCP to exchange with stakeholders, including trade unions, NGOs and the business community that are not part of the main body or of the advisory body of the NCP.

REPORTING PERIOD

The reporting period for this questionnaire is from 1 January to 31 December 2019.

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B. INSTITUTIONAL ARRANGEMENTS	
(a) Structure, location and composition of the NCP	
1. What is the <u>structure</u> of the NCP?	Inter-agency
2. Who are the members of the NCP? *Please describe the functions of the members of the NCP and the ministry/organisation they represent. No names are required.*	The NCP consists of a) a President (the Secretary of State for Trade), b) a Vice President (General Director of International Trade and Investment), c) a representative of the Directorate General of International Trade and Investment of the Ministry of Industry, Tourism and Trade, d) the head of the Directorate General in charge of the responsible business conduct, of the Ministry of Employment and Social Security, e) a representative of the Ministry of Industry, Tourism and Trade , f) a representative of the Ministry of Foreign Affairs, European Union and Cooperation, g) a representative of the Ministry of Justice h) a Secretary (the Deputy Director of International Investments). The NCP is in charge of the OECD Guidelines for Multinational Enterprises promotion. Moreover, it contributes to solve problems relating specific instances, it provides guidelines, practical information and assistance on all aspects of the latter Guidelines. In addition, the NCP is supported by an advisory body.
3. If the NCP is not a <u>single-agency NCP</u>, does it have a <u>secretariat</u>?	Yes
If yes, in which ministry or government body?	Ministry of Industry, Tourism and Trade
If yes, in which department of the ministry or government body?	International Investments Department
4. Has the NCP been established through a legislative, regulatory or administrative instrument (e.g. a statute, a decree, a ministerial resolution)?	Yes
If yes, please provide the name and dated of this instrument, and a link if available	Orden PRE/2167/2014, de 11 de noviembre, por la que se crea y regula la composición y funcionamiento del Punto Nacional de Contacto para la puesta en práctica de las Líneas Directrices de la Organización para la Cooperación y Desarrollo Económicos para las empresas multinacionales.

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*Additional comments on **Structure, location and composition of the NCP*** Click to enter text.	

(b) Advisory body	
5. Does the NCP have one or several <u>advisory bodies</u>?	Yes
If the NCP has several advisory bodies, please specify.	
If yes, please describe the advisory body(ies)' functions (e.g. advising on promotion, on specific instance handling in general, on individual cases, providing <u>oversight</u>, etc.)	It contributes to the proper functioning of the NCP. It disseminates its work and cooperates in the OECD Guidelines promotion. Besides, it considers the NCP cooperation proposals regarding the specific instances procedures
If yes, please list the names of organisations that are represented on the advisory body(ies) and the type of organisation. *(e.g. government, NGO, trade union, business, business organisation, academic, consumer organisation, etc.)*	Spanish Chamber of Commerce (bss org.) , CEOE (Spanish Confederation of Business Associations, CCOO (trade union), UGT (trade union) , USO (trade union), Transparency International Spain , Corporate Social Responsibility Observatory.
If yes, please indicate how often the advisory body(ies) meets	Between three times a year and once a month
6. If an advisory body provides <u>oversight</u>, please describe the oversight procedure	Click here to enter text.
*Additional comments on **Advisory body**:* Click here to enter text.	

(c) Human and financial resources			
7. Does the NCP have dedicated full-time staff? *If yes, please indicate the number.*	Yes	2	
8. Does the NCP have dedicated part-time staff? *If yes, please indicate in the second box the number of part-time staff members and in the third box the percentage of time spent on NCP matters for each part-time staff member.*	Yes	3	*10%*
9. Have any full-time or part-time staff members joined the secretariat/support office during the year? *If yes, please indicate how many.*	Yes, full-time staff member(s)	2	
10. Have any full-time or part-time staff members left the NCP during the year? *If yes, please indicate how many.*	Yes, both part-time and full-time staff members	3	
11. Did the NCP have a <u>dedicated budget</u> this year?	No		
If no, were financial resources for promotional activities allocated on an ad hoc basis when requested by the NCP?	No		

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If no, were financial resources for specific instances allocated on an ad hoc basis when requested by the NCP?	No
12. During the year, did the human and financial resources available to the NCP allow it to:	
Handle specific instances in an efficient and timely manner	Yes
Organise promotional events	Yes
Attend NCP meetings at the OECD	Yes
Attend events organised by other NCPs	Yes
Attend events organised by stakeholders	Yes
Cover professional mediator fees or in-house mediator fees	No
Conduct fact-finding research into specific instances	Yes
If you answered no to any of the above, please specify	The specific instances solved during the year did not require professional mediation
The NCP is financed via the resources of the Ministry of Industry budget. However, it does not have a dedicated budget. **It is also worth noting that the Spanish NCP had an active role in the translation of the Due Diligence Guide using its own financial and human resources.**	
(d) Reporting	
13. Does the NCP report to the government on its activities?	Yes
If yes, how often?	On an ongoing basis
14. Does the NCP report to parliament on its activities?	Yes
If yes, how often?	Twice a year
15. Please indicate any other relevant transparency requirement applicable to the NCP in your country	The Procedure Guide contains several transparency requirements regarding specific instances such as publicating a final report of specific instances
Issues on Business Conduct and the NCP are generally included in the statements of the Secretary of State for Trade to the Congress.	

C. INFORMATION AND PROMOTION		
(a) NCP website[2]		
16. Does the NCP have a website? If yes, please provide the link in the second box.	Yes	https://www.comercio.gob.es/es-ES/inversiones-exteriores/punto-nacional-contacto-lineas-

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[2]   This includes dedicated NCP webpages as part of the Ministry's website.

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	directrices/Paginas/El_PNC.aspx text.
If yes, was the website created/renovated this year?	No
17. Are the following items available on the NCP website?	
Information about the Guidelines and the role of the NCP	
The text of the Guidelines	Yes
A description of the Guidelines	Yes
The OECD Due Diligence Guidance Documents	Yes
Explanatory text about due diligence	Yes
Information on the NCP and its mandate	Yes
The NCP Annual Report submitted to the OECD	No
The NCP's Report to government and/or parliament (if applicable)	N/A
The NCP's peer review report (if applicable)	N/A
Information about specific instances	
Information on how to submit a specific instance	Yes
An online form to submit a specific instance	No
The NCP's rules of procedures	Yes
All final statements since 2011	Yes
Information on promotional activities	
The NCP's promotional plan	No
Information on upcoming events promoting the Guidelines	No
Information on past events promoting the Guidelines	Yes
Contact information	
Information on how to make an enquiry to the NCP	Yes
A phone number to reach the NCP directly	Yes
An email address to reach the NCP directly	Yes
*Additional comments on **NCP website**:* Click here to enter text.	
(b) Promotional activities[3]	
18. Does the NCP have a promotional plan for the coming year(s)?	No

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[3]   Attendance of NCP meetings held at the OECD and other OECD events such as the Global Forum on Responsible Business Conduct are not considered to be promotional activities.

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19. Did the NCP organise or co-organise events to promote the Guidelines and/or the NCP during the year? *If yes, please provide details in table 1 in Annex 1.*	No
20. Did the NCP make a presentation to promote the Guidelines and/or the NCP in events organised by others? *If yes, please provide details in table 2 in Annex 1.*	Yes
21. Did the NCP make use of social media to communicate on NCP promotional activities during the year?	No
22. Did the NCP hold a <u>stakeholder meeting</u> during the year?	No
23. Did the NCP promote the Guidelines among the business community during the year?	Yes
24. Did the NCP carry out any training on the Guidelines aimed at businesses during the year?	No
25. Did the NCP promote the Guidelines among NGOs during the year?	No
26. Did the NCP promote the Guidelines among trade unions during the year?	No
27. Did the NCP promote the Guidelines among government agencies during the year?	Yes
28. Did the NCP promote the Guidelines among embassies abroad during the year?	Yes
29. Did the NCP promote the Guidelines to investment promotion agencies during the year?	Yes
30. Did the NCP focus on any of the following during promotional activities during the year:	
OECD Due Diligence Guidance for Responsible Business Conduct	*Yes*
OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector	*Yes*
Due Diligence for Responsible Corporate Lending and Securities Underwriting and/or Responsible Business Conduct for Institutional Investors	*No*
OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas	*No*
OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector	*No*
OECD-FAO Guidance for Responsible Agricultural Supply Chains	*No*
*Additional comments on the section **Promotional activities**:* **The annual promotional plan will be proposed to the NCP in a forecoming meeting.** **In 2019 Promotional Plan, the NCP included a presentation of OECD´s Due Diligence Guide translated to Spanish but, due to the delay in the government formation, the NCP rescheduled the latter presentation for 2020.**	

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D. SPECIFIC INSTANCES		
(a) NCP rules of procedure for handling specific instances		
31. Does the NCP have rules of procedure describing the handling of specific instances?	*Yes*	
32. Are the rules of procedure available online? *If yes, please provide a link in the second box. If no, please attach a copy of the rules of procedure to this questionnaire*	Yes	Click here to enter text. www.comercio.mineco.gob.es/es-ES/inversiones-exteriores/punto-nacional-contacto-lineas-directrices/Paginas/Guia-de-Procedimiento.aspx
33. Were the NCP's rules of procedure modified this year?	*No*	
*Additional comments on the section **Rules of procedure**:* Click here to enter text.		
(b) Specific instance practicalities		
34. Does the NCP confirm receipt of a specific instance submission?	*Yes*	
35. Does the NCP request feedback from the parties on the procedure following the conclusion of a specific instance?	*Yes*	
36. Has the NCP staff undergone training in dispute resolution or problem solving (e.g. mediation)?	*No*	
37. Did the NCP engage professional mediators during the year?	*No*	
38. Did the NCP staff or members conduct mediation this year?	*No*	
*Additional comments on the section **Specific instance practicalities**:* Click here to enter text.		
(c) Reporting specific instances		
39. Did the NCP receive new specific instance submissions during the year? *If yes, please also provide details in Annex 2*	*Yes*	
40. Did the NCP close specific instances during the year? *If yes, please also provide details in Annex 2*	*Yes*	

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41. Of the specific instances that were already in progress at the start of the year, are there any that are still ongoing at the end of the calendar year? *If yes, please also provide details in Annex 2*	No
42. Did the NCP follow up on a case during the year? *If yes, please also provide details in Annex 2*	Yes
43. Is the OECD case database accurate and up to date with regard to cases handled by the NCP?	No
*Additional comments on the section **Reporting specific instances**:* Click here to enter text.	

E. PEER LEARNING AND PEER REVIEWS	
44. Did the NCP take part in the following activities with other NCPs during the year:	
Host a peer learning activity	*No*
Participate in peer learning activities hosted by other NCPs	*No*
Co-operate with other NCPs in handling specific instances	*No*
Provide mentoring/capacity building to another NCP	*No*
45. Is the NCP interested in hosting an NCP learning/experience-sharing event in 2020?	*No*
46. Which topic would the NCP consider to be a priority to cover in a peer learning event?	Legal issues
47. Is the NCP interested in participating in developing tools for use by NCPs?	*Yes*
48. Is the NCP interested in acting as a peer reviewer in the future?	*No*
If yes, please specify the semester and the year	Click to enter text.
*Additional comments on the section **Peer-learning and peer reviews**:* **The Spanish NCP participated in UK´s NCP peer review this year.**	

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F. POLICY COHERENCE[4]		
49. Have the Guidelines been referred to in relevant national legislation/regulations/policies adopted during the year? *(e.g. on responsible business conduct; non-financial reporting, export credits regulation, public procurement)*	*No*	
If yes, please provide a short summary and a link to the legislation. *If a link is not available, please attach a copy of the legislation to this questionnaire.*		
50. Did your country adopt a National Action Plan (NAP) this year? *If yes, please indicate which type of NAP*	*No*	Choose an item.
If yes, please provide a link	Click or tap here to enter text.	
If yes, does the NAP make reference to the Guidelines?	Choose an item.	
If yes, does the NAP make reference to the NCP?	Choose an item.	
51. Was a NAP in development this year? *If yes, please indicate which NAP.*	*Yes*	NAP on Business and Human Rights
If yes, did the NCP participate in the development of the National Action Plan?	*Yes*	
52. Did the NCP communicate public statements on specific instances to officials responsible for trade missions?	Yes	
53. Did the NCP communicate public statements on specific instances to officials responsible for foreign trade and investment incentives?	Yes	
54. Did the NCP communicate public statements on specific instances to public procurement officials?	No	
55. Does your national legislation or policy on public procurement refer to the Guidelines and/or OECD due diligence instruments and/or to the NCP process?	No	
If yes, please provide a link to the legislation. *If a link is not available, please attach a copy of the legislation to this questionnaire.*	Click to enter text.	
56. Have public procurement officials/practitioners consulted the NCP on the Guidelines and OECD due diligence instruments or involved the NCP in specific public procurement opportunities?	No	
57. Were public procurement officials involved in any of your training/outreach activities?	No	
58. What tools or projects does the NCP develop to support public procurement practitioners on RBC and OECD due diligence?	Click to enter text.	
59. Please flag any specific initiatives/good practice involving public procurement and RBC in your country.	SEE ADDITIONAL COMMENTS	

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[4] Paragraph 37 of the Commentary on the Implementation Procedures of the OECD Guidelines for Multinational Enterprises: "Statements and reports on the results of the proceedings made publicly available by the NCPs could be relevant to the administration of government programmes and policies. In order to foster policy coherence, NCPs are encouraged to inform these government agencies of their statements and reports when they are known by the NCP to be relevant to a specifics agency's policies and programmes […]."

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60. Please indicate any other examples of policy coherence activities.	SEE ADDITIONAL COMMENTS
Spain adopted a National Action Plan on Business and Human Rights in 2017 that refer substantially to the OECD Guidelines and, during this year, the NCP and other government bodies have been working on a new and more ambitiuos National Action Plan to study and increase the coherence between internationalization policies and human rights principles. In addition, the NCP´s Secretariat is member of the monitoring committee. Link: *www.exteriores.gob.es/Portal/es/PoliticaExteriorCooperacion/DerechosHumanos/Documents/170714%20PAN%20Empresas%20y%20Derechos%20Humanos.pdf*	

G. CHALLENGES

61. Has the NCP faced any particular challenge(s) it would like to highlight this year?	The Spanish NCP identifies 2 challenges for 2020: improving capacity building and increase promotional activities
*Additional comments on **Challenges**:* Click here to enter text.	

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Annex 1: NCP PROMOTIONAL ACTIVITIES

Please provide information on the events organised or co-organised by the NCP (Table 1), and events in which the NCP has participated to promote the Guidelines (Table 2).
Please select the event type, size and type of audience as well as the theme from the dropdown menus for each event.
Please add additional lines if needed.

Table 1

NCP-organised and co-organised events to promote the Guidelines and/or the NCP							
Title	**Date** (dd/mm/yyyy)	**Location**	**Type of event**	**Size of audience**	**Organised or co-organised?**	**Targeted audience** e.g. Business representatives, NGOs, Trade unions, Academia, General public, Government representatives, etc.	**Theme** e.g. the OECD Guidelines, the NCP activities on sector due diligence guidance documents, etc.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.	Click here to enter text.	Click here to enter text.
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Click here to enter text.	Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Click here to enter text.	Click here to enter text.

Total number=	Click here to enter text.

Table 2

Presentations by the NCP to promote the Guidelines and/or the NCP in events organised by others								
Title	**Date** (dd/mm/yyyy)	**Location**	**Type of event**	**Size of audience**	**Targeted audience** *e.g. Business representatives, NGOs, Trade unions, Academia, General public, Government representatives, etc*	**Organiser(s)**	**Type of intervention**	**Theme of the intervention**
CEOE International Conference on Business and Human Rights	03/04/2019	Madrid	**Conference**	**50-100**	Business Representatives	CEOE **(National Business Association)**	Opening Speech and Intervention in one of the Sectio ns	Business Due Dilligence on Human Rights
Spanish AMFORI Network meeting	09/04/2019	Madrid	**Conference**	**10-50**	Business representatives	AMFORI- **BSCI**	Presentation and debate	The Spanish NCP and its work in the context of the OECD Guidelines
Responsible Sourcing Commission Annual Meeting	30/04/2019	Madrid	**Conference**	**10-50**	Business	Club de Excelencia en Sostenibilidad	Opening Speech	Responsible Business Conduct as a factor in the internationalization of SP Business
Workshop on Due Dilligence in the Textile Sector	04/06/2019	Madrid	**Other**	**10-50**	Business, NGOs	Foro Social de la Moda **(Social Fashion Forum)**	Round Table participation	OECD Due Diligence Guide

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Masters' degree in Due Dilligence	27/11/2019	Madrid	**Other**	**<10**	Academia	Transparencia internacional	2 hour class in a Masters' Degree Course on Due Dilligence	The Spanish NCP and the OECD Guidelines
Click here to enter text.	Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.

Total number=	6

Annex 2: SPECIFIC INSTANCES

Please provide details of the following in the table below:

1. Specific instances **in progress** during the year (specific instances received and found to merit further examination after the initial assessment, and under consideration by the NCP).
2. Specific instances **concluded** during the year (specific instances that the NCP found to merit further examination after the initial assessment and that have subsequently been closed).
3. Specific instances **not accepted** during the year (specific instances that the NCP found not to merit further examination).
4. Specific instances for which **follow up** was performed during the year (the NCP monitored whether the agreement reached by the parties or its recommendations to the parties have been implemented)

Please add additional lines if needed.

We encourage all NCPs to inform the Secretariat on received specific instances and to provide a final statement as soon as it becomes available, in order to keep the OECD database updated at all times. For all specific instances that have not yet been reported to the Secretariat, please complete and send this form to Alison.holm@oecd.org and Kathryn.dovey@oecd.org[5].

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[5] According to paragraph 42 of the Commentary on the Implementation Procedures of the OEDC Guidelines for Multinational Enterprises, "[…] NCPs will report to the Investment Committee in order to include in the Annual Report on the OECD Guidelines information on all specific instances that have been initiated by parties, including those that are in the process of an initial assessment, those for which offers of good offices have been extended and discussions are in progress, and those in which the NCP has decided not to extend an offer of good offices after an initial assessment".

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For all specific instances that are currently IN PROGRESS:

Names of parties	Date received (dd/mm/yyyy)	Is the initial assessment publicly available?	Link to OECD database if available	Did the NCP co-operate with other NCPs during the handling of this specific instance? If yes, please describe.
Click here to enter text.	Click here to enter text.	Choose an item.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Choose an item.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Choose an item.	Click here to enter text.	Click here to enter text.

Total number= 0

For all specific instances that were CONCLUDED during the year:

Title	Date received (dd/mm/yyyy)	Date concluded (dd/mm/yyyy)	Link to OECD database if available	Outcomes achieved	Does the final statement plan for follow up?	Did the NCP co-operate with other NCPs during the handling of this specific instance? If yes, please describe.
Construction of hydroelectric plant in Guatemala	23/11/2017	03/12/2019	Click here to enter text.	Other	Choose an item.	
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Click here to enter text.

Total number= 1

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For all specific instances that were NOT ACCEPTED during the year:

Title	Date received (dd/mm/yyyy)	Link to OECD database if available	Reasons for not accepting the specific instance	Did the NCP co-operate with other NCPs during the handling of this specific instance? If yes, please describe.
Human Resources policy of a multinational firm operating in Spain	31/8/2018	Click here to enter text.	The issue is not material and substantiated	No
Click here to enter text.	Click here to enter text.	Click here to enter text.	Choose an item.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Choose an item.	Click here to enter text.

Total number= 1

For all specific instances for which FOLLOW UP was performed during the year:

Title	Date concluded (dd/mm/yyyy)	Date of follow up (dd/mm/yyyy)	Was a public follow up statement issued?	Link to the follow up statement, if applicable
Union rights issues involving a Spanish Security Services company in LATAM	31/05/2016	30/07/2019	Other	n.a.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Choose an item.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Choose an item.	Click here to enter text.

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Total number=	1

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END OF QUESTIONNAIRE