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The neoliberal conception of corruption in the accounting discourse of JBS

Concepção neoliberal da corrupção no discurso contábil da JBS

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Keywords

Corruption.
Neoliberalism.
Critical accounting.
Accounting reports.
Critical discourse analysis.

Abstract

Corruption is an extensively studied social phenomenon which became increasingly present in the Brazilian public debate in recent years. In this paper, we assume that neoliberal ideology disseminates a particular conception of corruption predominantly situated in public agents, and whose remedy therefore involves weakening the state. This conception is widely spread by international organizations that present preconceived solutions to eliminate corruption. It is therefore the purpose of this article to investigate how corruption-related discourses are presented and promoted in the annual corporate reports of a large company involved in a corruption case. To that end, critical discourse analysis, more specifically Fairclough's three-dimensional model, was used. Among the main findings, it was possible to conclude that, in its reports, the company attempts to escape accountability for the corruption acts by smoothing them out and attributing them to a specific group within the organization. It was also possible to identify an alignment with the neoliberal conception of corruption by blaming it on the state as the agent of corruption and adopting readymade solutions disseminated and legitimized by international neoliberalism-oriented organizations.

Palavras-chave

Corrupção. Neoliberalismo. Contabilidade crítica. Relatórios contábeis. Análise crítica de discurso.

Resumo

A corrupção é um fenômeno social amplamente estudado que permeia o debate público brasileiro com maior intensidade nos últimos anos. Neste artigo assumimos que a ideologia neoliberal propaga uma concepção particular de corrupção situada predominantemente nos agentes públicos cujo remédio passa, por consequência, pelo enfraquecimento do Estado. Esta concepção é amplamente difundida por organizações internacionais que apresentam soluções pré-concebidas para eliminar a corrupção. Neste sentido, este artigo se propõe a investigar de que forma se apresentam os discursos atrelados à corrupção divulgados nos relatórios corporativos anuais de uma grande empresa envolvida em caso de corrupção. Para isso foi utilizada a Análise Crítica do Discurso, mais especificamente o modelo tridimensional de Fairclough. Entre os principais achados foi possível concluir que em seus relatórios a empresa procura se eximir de responsabilidade pelos atos de corrupção, suavizandoos e atribuindo-lhes a um grupo específico dentro da organização. Ademais, foi possível identificar um alinhamento com a concepção neoliberal da corrupção por meio da responsabilização do Estado enquanto agente da corrupção, bem como pela adoção de soluções prontas difundidas e legitimadas por organizações internacionais de orientação neoliberal.

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Practical implications

Considering the informational relevance of accounting reports for society, this paper helps to interpret these documents, unveiling implicit meanings placed on corruption. It provides support for social actors to understand the interests and ideologies contained in such information, challenging its neutrality and assisting decision making towards change in the conception and interpretation of these reports.

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1 INTRODUCTION

Corruption is a prominent subject in Brazilian society, pervading the economic, political and social debate, and it is often used as an argument in election campaigns and discussions about the relationship between the state and businesses, the public and private sectors, becoming a blemish companies, parties and politicians seek distance from. It is important to understand, however, that this is not a national phenomenon, but the result of a set of neoliberal ideas that seek to present corruption as a practice of the state alone (Brown & Cloke, 2004; Merino et al., 2010; Bratsis, 2014). Thus, to decrease corruption, the logical response proposed by neoliberal ideology suggests decreasing the state by promoting privatization and less state participation in people's lives (Brown & Cloke, 2004; Merino et al., 2010; Bratsis, 2014). These authors point out that the liberal approach includes a set of practices advocated and disseminated by international institutions like the World Bank, Transparency International, and the Organization for Economic Cooperation and Development (OECD).

Thus, the notion of corruption according to neoliberal ideology has become stronger in Brazil in recent years, when corruption was raised to the position of major national malady, justifying actions against administrations, political parties and companies. Along with the neoliberal notion of corruption, a set of practices also arrived in Brazil which were proposed by these international bodies as a means to efficiently combat corrupt practices.

However, while it contributes significantly to understanding corruption as a neoliberal instrument to dismantle the state, the work of these authors does not investigate how such understanding is constituted.

Thus, analyzing the forms of discursive constitution can be a tool for understanding how the discourse about corruption supports its social constitution. Considering the recent cases of corporate corruption and the disclosure requirements that applied to the companies involved, we can see that accounting plays a critical role as a disseminator of this set of ideas of corruption from an overly technical perspective.

While it was conceived for neutrality, objectivity and independence (Gallhover & Haslam, 1991), accounting is pointed out by several authors as an instrument for legitimizing and maintaining dominant groups (Tinker & Neimark, 1987; Armenic, 1992; Arnold & Hammond, 1994; Chwastiak & Young, 2003; Farjaudon & Haynes, 2016; Annisette et al., 2017). Other studies show how accounting is capable of reproducing predominant discourses and silencing negative outcomes of profit maximization activities, precluding several types of exploration in accounting reports, such as those of social and environmental aspects (Chwastiak & Young, 2003; Chiapello, 2017). In this context, accounting standards and laws assume an essentially neoliberal form, and accounting becomes not only an instrument that evidences neoliberal policies, but also a project of legitimacy used to justify reforms such as privatization (Chiapello, 2017). Thus, neoliberalism, corruption and "financialization" are closely linked, since neoliberal policies, assisted by accounting techniques, have enabled financial markets to increase their importance and strengthen the primacy of shareholders or, more precisely, the capitalist class (Chiapello, 2017). In addition, we consider that accounting is a communication system and therefore possesses an ideological dimension of language, which leads us to bring interest and ideology questions to the forefront (Domech, 2007; Manassian, 2000). Thus, analyzing the discourses that pervade accounting information is analyzing the world representations and viewpoints of participants and the way in which accounting can shape a certain "reality" (Homero Junior, 2017; Ashraf et al., 2018, quotation marks in original).

In this work we argue that the neoliberal view of corruption is built by means of companies' accounting instruments. From this perspective, it is possible to unveil meanings placed on corruption which are implicit in accounting instruments and, for this reason, dressed up with technical arguments and credibility in the information provided to the market. To evidence how corruption from the neoliberal perspective is constituted in discourse, we analyzed the discourse of a company involved in a corruption case. In 2017, JBS found itself involved in corruption accusations that included its top management and reached even the Brazilian president at the time. Considering its relevance in the national market, the company was required to report the case on its reports. Thus, analyzing the firm's accounting reports provides a rich field of analysis to understand how the company represented corruption in its communication to the market.

Therefore, this paper investigates how the discourses about corruption published in JBS' 2017 and 2018 annual corporate reports are presented. The assumption guiding this goal is that the conception of corruption formed in the report is in line with a neoliberal view that situates corruption within the state. In addition, with this purpose, we sought to clarify some discourses present in the Brazilian corporate discourse arena and problematize the so-called accounting neutrality, inquiring whether accounting can be used as an ideological tool and adopt a hegemonic discourse in reporting the phenomenon. To that end, the study used mainly critical discourse analysis (CDA) in the way proposed by Norman Fairclough in Discourse and Social Change, with his three-dimensional model.

2 CORRUPTION AND NEOLIBERALISM

While it may sound naïve and like a mere semantics question to study the definition of corruption, the way in which the phenomenon is defined can provide support to what will be measured and modeled (Jain, 2001; Miranda, 2018). According to Miranda (2018, p. 238), there is "almost one concept of corruption for each scholar of the matter". Brei (1996) says that the main discrepancies lie in the elucidation of what a corrupt action is: an act may be considered corrupt in one context but not in another, generating totally different consequences and penalties. Thus, this work's intent is not to raise or discuss an new conceptualization of this phenomenon. We consider that there are several criteria based on different theoretical perspectives to help in this pursuit of understanding corruption (Scott, 1972; Heidenheimer, 1970; Brei, 1996; Granovetter, 2006; Gardiner, 2007).

Our purpose is to debate, like Bedirhanoğlu (2007), the ideological role of the neoliberal discourse that associates corruption to countries' historic and cultural specificities and which can be contradictory in terms of anti-corruption strategies.

It was back in the 1990s that, according to Filgueiras (2012), the approach to corruption from an economic perspective, initiated by scholar Susan-Rose Ackerman (1975), became hegemonic. According to the author, that approach is related to the then new political agenda, whose premises included the adoption of institutional reforms to curb corruption incentive systems. In this approach to corruption, multilateral bodies gained recognition as they supported state reforms, as seen in particular with the International Monetary Fund (IMF) and the World Bank (Filgueiras, 2012).

For Bratsis (2014), corruption is currently intentionally used as a synonym for lack of transparency. The purpose of this is to promote the goal of a global capitalism with minimal political barriers, justifying increased interference by major powers in peripheral countries of their interest. In this respect, the neoliberal discourse sometimes links corruption to a certain group, particularly the state and its agents, understanding the phenomenon as an abuse of the public role (Hope, 1987; Brei, 1996; Huntington, 2002; Brown & Cloke, 2004; Bratsis, 2014). Thus, many of the discussions taking place in current society focus on bribes received by public agents, often presenting corruptive private sector companies as victims of a perverted public system, whose justification is that of business survival established through a "corruption culture" in Brazil (Souza, 2019; Brito, 2015, s/p).

Thus, from the neoliberal perspective, the solution to corruption constantly associated with the public sector involves the action of the market, which by means of reforms aimed at leaning the public apparatus is able to succeed in this struggle (Brown & Cloke, 2004; Merino et al., 2010; Bratsis, 2014). Regarding the same view that situates corruption in a particular set of practices, Brown and Cloke (2004) illustrate how limited the concept is that understands corruption as predominant in peripheral countries. According to the authors, considering these countries as the source of the phenomenon is using artifices to carry out reforms that create free market conditions with the excuse of overcoming the great malaise of corruption. In this respect Hawley (2000, p. 1) says that international bodies like the World Bank and the International Monetary Fund propose, in general, anti-poverty actions and "good governance", but act differently when they have other priorities. Thus, we can see that these international bodies reached prominence in the anti-corruption fight using the same rhetoric of concern with underdeveloped countries (Brown & Cloke, 2004). One of these organizations is Transparency International (TI), which presents itself as an independent, nonpartizan organization created in 1993 (Transparency International, 2020), and was the creator of one of the best-known indicators in this field around the world, namely the Corruption Perception Index (CPI). Considered by the institution as a tool for measuring corruption in countries, the CPI was built from other indicators and is based on the opinion of executives and analysts from transnational corporations about the level of corruption they perceive in a given country or territory (Abramo, 2005).

Another well-known international body is the Organization for Economic Co-operation and Development (OECD), which presents itself as a driving force in the global anti-corruption movement for more than four decades (OECD, 2020), and whose general goals include supporting "trustworthy institutions and open, efficient and inclusive markets" (OECD, 2020). In turn, the World Bank, one of the main funders of projects in underdeveloped countries, analyzes the corruption risk in potential loans. Over time, it has also included the fight against corruption "within international market processes and policies which encourage and profit from corruption" (The World Bank, 2020; Shneider, 2012, p. 428).

Whyte (2007) highlights how these global anti-corruption strategies are building momentum as a true emerging anti-corruption industry, with support from governments and transnational institutions. Within this combat system that neoliberalism uses to justify its fight against corruption, we highlight the study of Merino et al. (2010). The authors expatiated on the creation of the Sarbanes-Oxley (SOX) Act, passed in 2002 as a US government response to the outrageous corruption cases that occurred in the country, and expressed how the lack of effective market regulation generates the maintenance of a flawed corporate governance model that privileges

shareholders and promotes a laissez-faire government approach to the market.

Accounting as a neoliberal normative mechanism is also the object of study of Chiapello (2017, p. 9), who says it is the "normative starting point" of the discourse that established corruption. For the author, the quantitative expression based on mathematic techniques and objective measures provided by accounting is considered a legitimate form of expression nowadays. In addition, accounting strengthens neoliberalism, whether through normative academic research with little critical appeal or when it is used as an element of public transparency and accountability (Chiapello, 2017).

3 METHODOLOGY

This research undertakes to analyze the annual reports of JBS S.A. for 2017 and 2018. The reason for choosing JBS is the company's size and importance in the Brazilian scenario, as well as the breadth of the corruption cases, in which the company's main executives were accused. Another factor taken into account in choosing the studied company regards the fact that JBS has stocks traded in stock exchanges. The disclosure of information in such cases, besides mandatory, is fundamental for the company's profitability and position in the stock market. Finally, the information disclosure carried out by JBS was complete. Thus, it is worth noting that the analyzed documents were retrieved from the company's website called "Relações com Investidores" (https://ri.jbs.com.br/pt), on the tab "Informações Financeiras – Central de Resultado".

Regarding the method of data analysis, we chose to analyze the discourses contained in the annual reports from a corruption-related perspective and based on the studies of Norman Fairclough. The author argues that critical discourse analysis (CDA) is a theoretical approach to language, and its analysis structure seeks, among others, to emphasize a social problem and reflect critically about the analysis (Fairclough & Melo, 2012). The scholar also assumes that certain language uses and symbolic forms are ideological and employed to maintain or establish forms of domination, since ideologies are significations of realities built in various dimensions of discursive practices, which contribute to domination relations. CDA is also applicable to this work as it deals with a transdisciplinary and multidisciplinary theoretical-methodological approach (Resende & Ramalho, 2017).

For this analysis, the three-dimensional model proposed by Fairclough (2016) was used, emphasizing textual analysis, discursive practice and social practice. The textual analysis deals with vocabulary, grammar, cohesion and textual structure. In the discursive practices, textual production, distribution and consumption are analyzed. The social practice analysis discusses the concept of discourse in relation to ideology and power, i.e., it seeks to understand how discourses are constituted and move within the environment in which the analyzed discourse is situated. It is worth noting that to Fairclough (2016) it is not possible to speak of textual aspects without situating their production and interpretation. Due to this overlap, the division between textual and discursive practice is not so distinct according to the linguist himself. For this reason, he proposes a broader model of analysis for both categories. Therefore, to organize the analysis and interpretation of data, we chose to divide the work into two main sections: (1) social practice; and (2) textual analysis and discursive practice.

Finally, based on the three-dimensional model analysis, we identified certain discursive formations, presented and explained in the article conclusion. Discursive formation is an expression originated in Foucault's (2008) work, used by Pêcheux (2009) to refer to what is understood when we use a particular word, expression, sentence or any enunciation. It is through discursive formation that we understand the meaning of a given enunciation. According to the author, we do not find discourses neatly ordered, but dispersed, and what gives them unity is the system of rules that govern the formations of discourses, i.e., the discursive formations. Pêcheux calls discursive formation "that which [...] from a given position in a given conjuncture [...] determines what can and should be said" (Pêcheux, 2009, p. 146). All meaning in a discourse comes, according to him, from the discursive formation where it is produced, and this discourse has different meanings according to the positions of its user. Based on this, Fairclough (2016) affirms that discursive formations are built by rules that make certain enunciations possible in a particular time, place and institutional location.

4 RESULTS

The results were structured so as to highlight: (1) the social practice – the importance that corruption has taken on in Brazilian society, and the tools proposed by international organizations to eliminate it; (2) the textual analysis and the discursive practice – the discursive strategies the company employs to escape accountability, and the ways in which corruption is attributed to the state.

4.1 Corruption as a social practice

In this section we discuss how the discursive practices ideologically invested in the analyzed documents can contribute to maintaining or restructuring power relations (Fairclough, 2016). Thus, it is worth examining the discourses that pervade corruption, such as those of national and international press, which help to disseminate the feeling that corruption is the great enemy, responsible for social dysfunction. Specifically in Brazil, the discourse that understands corruption as "the disease of the century" (Gazeta Digital, 2005) gathered strength mainly from 2014, with the beginning of Operation Car Wash (in Portuguese, *Operação Lava Jato*) and that year's presidential race, in which political polarization became evident in the country (Matos; Formentin, 2016). The subject, which had been gaining ever greater media coverage, spread across the country, leading part of the population to follow the cases on the internet, newspapers and magazines in anticipation of the next scandal (Warde Junior, 2018). While the JBS reports (2017 and 2018) were being prepared, the country was going through the period that followed President Dilma Rousseff's impeachment, in which the assimilation of corruption as the main national problem grew stronger. It is also worth noting that this assimilation was possible in part thanks to the discourse produced and repeatedly spread that corruption is "a disease that afflicts the Brazilian society", whose effect is demonstrated, for example, by the survey conducted by *Fundação Getúlio Vargas* (FGV). In that study, corruption was indicated as the main cause of anguish for Brazilians in 2018 (Gadelhâ & Tenório, 2018, n/p.)

In this panorama, anti-corruption discussions and solutions proliferated, and international bodies became prominent in corruption fighting. One of these organizations which was among the emerging voices was the World Bank, considered one of the bodies that led major anti-corruption campaigns around the world (Fernandes, 2020). The World Bank considers corruption a double challenge to eradicate extreme poverty and increase prosperity for the poorest 40% in developing countries, besides sustaining that corruption decreases the access to health, education and justice services (The World Bank, 2020b). In turn, the OECD, another voice identified in this international scenario, argues that corruption threatens good governance, sustainable economic development and fair trade, and poses a major obstacle to poor people's access to essential public services. It establishes as possible solutions international anti-corruption principles and standards, such as "combating bribery"; "promoting responsible business conduct"; "preventing corruption in the public sector"; and "improving governance through support to development" (OECD, 2020a). Finally, Transparency International (TI), created in 1993 and whose main founder was a former World Bank official, advocates the methodology of the well-known Corruption Perception Index, which measures the perception of corruption in the public sector around the world, i.e., the private sector is not reckoned with (Transparência Internacional, 2020a). In addition to the Corruption Perception Index, the Corruption Fighter's Toolkit was created. The organization says that this kit consists of practical anti-corruption experiences reported by the civil society, though with more accessible language (Transparency International, 2020b). The kit comprises three documents which, according to the institution, are "innovative anti-corruption tools" that confirm the "creativity and commitment of several groups engaged in the fight against corruption".

After analyzing the discourses of the international bodies, we can see that they are voices which converge and foment the social practice of companies with regard to corruption fighting. Besides dictating how corruption must be fought, the bodies attach an economic bias to the phenomenon, disregarding cultural, social and historic specificities. Corruption is understood as an incentive system and considered the main responsible for the world's social maladies. According to these bodies, thanks to violations committed by corrupt individuals, a great part of the underserved population lacks access to essential services. Simplification in addressing corruption is also present in the attempt to associate a greater incidence of this crime with the so-called developing countries. Because they consider that there is more abuse of power in these places, the international dominant discourse preaches that developing countries are more susceptible to corruption. Thus, the corruption linked to the state and its agents stands out in the voice of these bodies. In common, the solution involves corporate tools, such as the creation of an investigation system, a toolkit, or even the use of advanced technology, as indicated by the World Bank.

4.2 Textual analysis and discursive practice

In this section, the study focuses on how discourses can emerge from accounting reports from a discursive perspective, with regard to corruption. Thus, the section debates linguistic aspects such as vocabulary, grammar, textual structure and social actors which are part of discourse. Some discursive strategies such as euphemism, the use of adjectives and the passive voice, as well as the presence of certain social actors, were found in the JBS reports, as highlighted in the chart below and detailed over the analysis:

<u>~</u>	
Discursive strategy (examples)	Effect
Euphemism: "events contrary to the law"; "irregular acts".	Attempt to smooth out criminal practices.
Use of adjectives: "certain" (executives).	Discursively segmenting a certain group in order to build a dangerous, threatening enemy.
Use of the passive voice: irregular acts "perpetrated and confessed"; "perpetration" of crimes.	Separating the company from the corruption cases in order to deconcentrate actors and the actions and crimes committed by the company

committed by the company.

corruption agents (neoliberal view);

supported by international bodies.

(1) Bearing the whole burden of the corruption cases;

(3) the strategy in which the company sustains arguments

(2) fomenting the discourse that public agents are

Table 1. Discursive strategies and their effects

Source: The authors.

(2) public agents;

(3) international bodies.

Social actors emerging from the discourse:

(1) executives accused of corruption;

According to Thompson (2011), using euphemisms may be a strategy to dissimulate social relationships, since institutions or actions are described in a way that seeks to elicit a positive valuation. Thus, in our analysis we identified the following passages:

> As it is publicly known, in May 2017 certain executives and former executives of J&F Investimentos S.A. ("J&F"), [...] serving the public interest, in special the furthering of investigations around events contrary to the law (JBS, 2018, p. 46, emphasis added).

> In the Agreement, J&F undertakes [...] provide them information to prove the materiality and attribution of the irregular acts perpetrated and confessed (JBS, 2017, p. 50; 2018, p. 46, emphasis added).

In the fragments above, the textual producer refers to the investigations around "events contrary to the law" and "irregular acts", in an attempt to smooth out the criminal practices. Therefore, we can see that the rhetoric contained in the JBS report uses euphemisms with regard to the corruption investigations, representing the occurrence in "a way that diverts our attention", disregarding "existing relationships and processes" (Thompson, 2011, p. 83). Regarding this dissimulation process, we emphasize that it can be seen as a discursive attempt to separate the company from the cases investigated. In the second passage, while the word "irregular" can be used for something "contrary to justice" (Ferreira, 2001, p. 433), it does not have the same meaning as expressions and words like "illegal acts" or "crimes". Moreover, in the first passage the company uses rhetoric to drive a separation between the body of employees and the executives and former executives involved in the leniency agreement. Thus, JBS seeks to situate corruption in a specific group of "certain executives" segregated from the other employees. The use of the adjective "certain" separates those who are involved in the leniency agreement from the rest of the company. The perception of separation of this group from the rest of the company that the use of "certain" conveys is a discursive strategy defined by Thomson (2011) as fragmentation. In this case, the fragmentation is presented as "purging the other", a term coined by Thompson (2011), in which the textual producer segments discursively a particular group in order to build a dangerous and threatening enemy. Regarding the discourse found in the JBS report, this enemy can be understood as the corruption committed specifically by this segregated group. Choosing a particular a target in the symbolic construction of this enemy can be seen as an attempt to escape guilt for the corruption cases it was accused of.

The second passage above also shows the separation of the company from the corruption cases, also using the passive voice. Such strategy seeks to deconcentrate actors, as well as the actions and crimes committed by the company. It is noteworthy that when the message to be conveyed refers to something negative, the producer resorts to the passive voice, as in the passage where they speak of "perpetration of the crimes of insider trading and market manipulation by the former-executives [...]" (JBS, 2017, p. 85; 2018, p. 81, emphasis added). The passive voice can be used with the purpose of changing or omitting the agent, or as an attempt to obscure their responsibility (Fairclough, 2016). The omission of the agent from the passages precludes defining who the perpetrators are. In the passage above, the producer also mentions the "perpetration of crimes (...) by the former executives at the time of the event". As to the fragment "irregular acts perpetrated and confessed", it has no mention whatsoever of who could have committed the crimes. The discourse built through the communication of the crimes places the perpetrators in a position of passive subjects, thus enabling the dissimulation of their responsibility. The erasure of such actions, which is accomplished using the passive voice, strengthens the sense of separation of the company from the cases of corruption or insider trading it was accused of. According to Thompson (2011), passivization also concentrates the reader's attention on particular subjects to the detriment of others, and therefore tends to erase space and time references as it eliminates verbal constructions.

Escape from accountability was also noted in the in the analysis of social actors. The first social actor present in JBS's discourse is represented by the executives accused of corruption. As mentioned earlier, the textual producer attempts to separate this group of executives by differentiating them from the other employees. This social actor emerges whenever the company needs to refer to the corruption cases and the investigations it is subject to. We identified the role of this social agent in bearing the whole burden of the corruption cases the company is accused of. Thus, their importance for building the discourse lies in the possibility of allowing the other employees and executives to escape accountability.

Imputation of corruption to the state was also found in the analysis of the social actors who are part of the discourse. In addition to the corrupt executives identified in the end of the previous section, another actor identified here were public agents. When describing in its report all the criminal procedures it is subject to, the company seeks to highlight the public agents involved. JBS also reinforces the image of corruption linked to the public sector when it also introduces this actor in anti-corruption control procedures:

Operation Weak Flesh (police inquiry): An investigation of suspected undue payments to federal officials of the Federal Inspection Service – SIF; the inquiries and criminal lawsuits investigate corruption by several companies in the agricultural and livestock industry (meatpacking). Specifically regarding the Company [...] (JBS, 2017, p. 85; 2018, p. 80).

Operation Open Gate (police inquiry): An investigation of supposed perpetration of corruption offenses at a JBS meatpacking unit in Barra do Garças/MT, due to suspected undue payments by employees to federal officials of the Federal Inspection Service – SIF (JBS, 2018, p. 80, emphasis added).

Operation Asphaltic Mud (police inquiry): [...] The Federal Police declare that they found signs of undue payments to public officials of the State of Mato Grosso do Sul in exchange for fiscal benefits granted to the Company [...] An investigation of suspected undue payments for fiscal incentives from the government of the State of Mato Grosso do Sul [...] (JBS, 2017, p. 85: 2018).

This type of approach is in line with the neoliberal view of corruption which sees corruption practices as a result of inefficiency on the part of the state and its agencies (Brown & Clock, 2004; Bratsis, 2014). Its agents are equally encompassed in this view, creating a real "theoretical myopia about corruption" (Filgueiras, 2008, p. 21). Thus, JBS's discourse situates corruption predominantly in the state, presenting it as a corruption agent and thus fomenting the discourse about the need to dismantle the state in order to fight corruption.

By means of the social actors, it was possible to identify the social actor denominated as "international bodies". We consider that these social actors are introduced in the text as a strategy for sustaining their own arguments as the company delegates voice to these entities recognized worldwide for fighting corruption, as in the examples below:

In January this year, the NGO Transparency International, which analyzes anti-corruption programs and the level of corporate transparency of the 100 largest Brazilian companies, gave JBS an 8.1 grade – considered "high" by the entity, against a national average 5.7. (JBS, 2017, p. 3, emphasis added).

In addition, JBS affiliated with the Instituto Ethos and signed the Business Pact for Integrity and against Corruption, developed by this NGO to disseminate good business practices and promote a fairer, more ethical market (JBS, 2018, emphasis added).

The discourse of these entities can unveil the search for legitimacy for the company's actions. In the JBS reports references were also found to the forms of fighting corruption that were proposed by these organizations. Through a voice external to the company, JBS tries to show how it is recognized in the field of compliance and ethics:

The Company structured a compliance program called "Always Do the Right Thing", to prevent conducts, both by employees and third parties, that may be contrary to the Code of Conduct and Ethics of the Company or to laws, regulations and/or internal procedures (JBS, 2018, p. 46, emphasis added).

(...), JBS has been enhancing the control actions and mechanisms hitherto adopted, and has developed new policies and procedures, in line with global best practices (JBS, 2017, p. 8).

The revision and publication of policies and procedures was treated as a priority in 2017. This action disseminated the advance of Compliance rules across the units in Brazil and were built according to the best market practices (JBS, 2017).

We have enhanced our processes and promoted major advances in our Compliance and Ethics program while also accelerating our global sustainability strategy, an area in which we are recognized by different representative entities around the world (JBS, p. 2, emphasis added).

We can infer that JBS seeks to decrease corruption by adopting the practices suggested by organizations like TI and the World Bank. By standing on a compliance program to prevent illicit conducts, JBS converges with the international neoliberal discourse which addresses the corruption issue technically, without perceiving the social, political and cultural context that the phenomenon should have. JBS went from a company recognized worldwide as one of the largest meat sellers to making the police headlines since 2017 for corruption cases. The company seeks support, by means of these social actors, in a possible attempt to link its image to positive episodes and obtain greater acceptance in the implementation of its new business policies.

The way in which shareholders emerge in JBS's discourse is meant to justify anti-corruption policies. The company justifies its governance practices in order to "create value, establish trust relationships with shareholders, investors and other groups of interest" (JBS, 2018, p. 6). The company also says that ethics, integrity and compliance are "subjects of the utmost importance for the sustainability of its business" and that it seeks to ensure "transparency in all operations" (JBS, 2018, p. 7). Thus, we can see that the textual producer seeks to communicate with this social actor when they need to demonstrate "transparency" in their business, give reasons for decisions related to this issue and justify a particular action to the market, when it mentions, for example, commitments "voluntarily" assumed in the corporate governance area, taking into account its stocks traded in B3's New Market (JBS, 2017, p. 7).

Finally, the analysis of the discursive practices points to questions of text production, distribution and consumption. Regarding production, the accounting report is internally produced by JBS, a multinational food company originated in Brazil, the only firm in the country to feature in Forbes Magazine's list of largest global companies in 2019 (Forbes, 2019) and accused of corruption, and the object of investigations by the Federal Police and the Attorney General's Office. Thus, it is worth noting that in the production of the JBS annual reports, the top management not only has access to the information generated by the company, but they can also influence its preparation, and therefore the reports can be a planned piece (Irigaray et al., 2017). The reports are essentially meant for consumption by the corporate class. This can be seen in the use of terms associated with the corporate environment, such as compliance, or through direct references to shareholders and investors. The distribution of accounting reports follows legal guidelines (Law 6404/76, known as the Brazilian Corporations Law: article 289), which places the reports within what Fairclough (2001) calls an intertextual chain, in which texts are introduced and disseminated. Thus, the reports are published in other media such as newspapers and corporate reports.

5 CONCLUSION

After analyzing the discourse contained in the JBS reports, it was possible to identify two discursive formations, which we call: (1) escape from accountability; (2) the neoliberal view of corruption which encompasses both the blaming of state agents and the readymade solutions proposed by international bodies that combat corruption. With regard to the former, we consider that JBS tries to escape accountability for the corruption acts by means of discursive strategies such as euphemism, purging the other, and passivization. We can infer from the analysis conducted that this stance reinforces the perception that corruption occurs only in a particular group and that we can segregate it and fight it. This was perceived in the use of certain words which produce the effect of separation, mainly by attributing corruption to a particular group. With regard to the latter, we noted that JBS's discourse resembles the neoliberal view of corruption. Thus, it was possible to note that the textual producer tries to attribute corruption mainly to public agents. This means that, according to the JBS reports, corruption is situated only in the state and its agents, responsible for corrupting executives, companies and the market. Another

practice disseminated by the neoliberal discourse concerns the approaches to anti-corruption solutions. In this case, JBS's discourse reproduces the neoliberal discourse of regulation for "good governance". Thus, the end of corruption is associated to the adoption of a set of preconceived measures guided by international bodies, whose application would result in extinguishing corrupt practices. This solution, as said earlier, ignores other factors of a social and cultural nature. We also observed that the company seeks to legitimize its compliance policies with the acquiescence of international bodies such as Transparency International. In the analysis of social practices, it was possible to note that the discourse of these entities converge with the neoliberal anti-corruption discourse in many aspects. From this perspective, corruption is, according to the literature (Brown & Cloke, 2004; Merino et al., 2010; Bratsis, 2014), commonly attributed to the state and its agents, and the phenomenon is considered the main villain behind social inequalities.

Thus, we believe that the conclusions point to the constitution of corruption in its neoliberal conception, namely that it is practiced by the state and susceptible to solution via readymade toolkits preformatted by international institutions guided by the same ideology. Moreover, this work contributes to the critical approach to accounting, evidencing how accounting techniques can reproduce neoliberal ideology. In this respect, the analysis of accounting documents and explanatory notes allows us to conclude that these reports cannot be seen as instruments which are neutral, merely technical and devoid of any stance or ideology. This analysis allowed us to evidence that the accounting techniques used by JBS reproduce neoliberal ideology, legitimizing and maintaining the position of dominant groups, as pointed out by the literature (Tinker & Neimark, 1987; Armenic, 1992; Arnold & Hammond, 1994; Chwastiak & Young, 2003).

The analyses conducted here helped us understand that JBS's discourse is not only similar to neoliberal discourse, but it also legitimizes and is legitimized by social practices adherent of this view, particularly regarding anti-corruption policies. The hegemonic neoliberal discourse reduces corruption to an economic logic, disregarding any and all complexity that the phenomenon may have. Still in this neoliberal panorama, some so-called anti-corruption tools emerge and proliferate, such as compliance programs, risks assessments, integrity tests, ethics and conduct codes, among others.

In this complex tangle that surrounds corruption, developing a "critical awareness of ideological processes in discourse" (Fairclough, 2016, p. 125) is essential if we are to counter the predominant logic we are subject to. Thus, it is important that we challenge the universalizing premises of neoliberal thought, in which a particular group, government or country is considered corrupt and therefore pointed out as a major enemy to be fought.

Finally, it is worth recalling that JBS, like Volkswagen, Arthur Andersen and other companies involved in emblematic corruption cases, was a benchmark in its industry and featured on newspaper front pages with record profits, awards and recognition for work considered well done. What happened to these companies that made headlines change so negatively? As a suggestion for future research, we believe that studying the evolution of corporate discourse over the years can contribute to understanding why a business group becomes (does it really become?) corrupt. What changes did these companies go through, what practices, policies and customs changed to result in corrupt conducts? Finally, studies can also look at the signs we can capture in their reports which can reveal such changes.

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