

**DECISION 15/2021**  
**OF THE GOVERNING BOARD**  
**OF THE EUROPEAN INSTITUTE OF INNOVATION AND TECHNOLOGY**

**ADOPTING THE REVISED EIT ANTI-FRAUD STRATEGY**

**THE GOVERNING BOARD OF THE EUROPEAN INSTITUTE OF INNOVATION AND TECHNOLOGY,**

Having regard to Regulation (EC) No 294/2008 of the European Parliament and of the Council of 11 March 2008 establishing the European Institute of Innovation and Technology,<sup>1</sup> as amended by Regulation (EU) No 1292/2013 of the European Parliament and of the Council of 11 December 2013<sup>2</sup> (hereinafter referred to as the "EIT Regulation"), and in particular, Article 22;

Having regard to the Staff Regulations of Officials, laid down by Council Regulation (EEC, EURATOM, ECSC) No 259/68 (hereinafter referred to as "Staff Regulations") and to the Conditions of Employment of Other Servants of the European Union (hereinafter referred to as "CEOS"), both as latest amended by Regulation<sup>3</sup> (EU, EURATOM) No 1023/2013 of the European Parliament and of the Council of 22 October 2013, and in particular, Articles 11a, 12a, 12b, 16 and 22a;

Having regard to Decision No 14/2010 of 21 May 2010 on adopting the Ethical & Organizational Code of Conduct of the European Institute of Innovation and Technology (hereinafter referred to as the EIT)<sup>3</sup>;

Having regard to Decision 21/2019 of the Governing Board on the Financial Regulation of the European Institute of Innovation and Technology<sup>4</sup> ("EIT Financial Regulation"), in particular, Articles 5, 30, 32(1), 48 and 86;

Having regard Decision 1/ 2020 of the Governing Board of 30 January 2020 on adoption of the minimum standards and the Internal Control Framework of EIT, and in particular Principle 8 set out in the Annex to this decision;

**WHEREAS**

(1) Pursuant to Article 30 of the EIT Financial Regulation, "[...] the budget of the Agency shall be implemented in compliance with effective and efficient internal control". It further provides that for the purposes of the implementation of the budget of the Union body, internal control shall be applied at all levels of management and shall be designed to provide reasonable assurance of achieving, inter alia, "the prevention, detection, correction and follow-up of fraud and irregularities". Effective internal control shall be based, inter alia, on "the implementation of an appropriate risk management and control strategy at recipient level". Efficient internal control shall be based, inter alia, on "the implementation of an appropriate risk management and control strategy coordinated among appropriate actors involved in the control chain".

(2) Pursuant to Article 32(1) of the EIT Financial Regulation, the Agency shall send by 31 January each year to the Commission, the European Parliament and the Council its draft single programming document, as endorsed by its

<sup>1</sup> OJ L97 of 09.04.2008, p. 1.

<sup>2</sup> OJ L347 of 20.12.2013, p. 174

<sup>3</sup> 00016.EIT.2010/l/Dir/CN/Ado

<sup>4</sup> Ref. Ares(2019)6810859 - 04/11/2019

Management Board, containing, inter alia, “the strategy for the organisational management and internal control systems including their anti-fraud strategy as last updated and an indication of measure to prevent recurrence of conflict of interest, irregularities and fraud [...]”. It further provides that the strategies referred to in the first subparagraph [i.e. inter alia the anti-fraud strategy] shall be assessed annually and updated as necessary.

(3) Pursuant to Article 48 of the EIT Financial Regulation, the Authorising Officer shall report to the Governing Board on the performance of his duties in a form of a consolidated annual activity report containing, inter alia, “information on organisational management and on the efficiency and effectiveness of the internal control systems including the implementation of the body's Anti-Fraud Strategy”.

(4) Pursuant to Article 86 of the EIT Financial Regulation, the EIT shall inform the Commission without delay on cases of presumed fraud and other financial irregularities. Moreover, it shall inform the Commission of any completed or ongoing investigations by the European Public Prosecutor's Office, the European Anti-Fraud Office ('OLAF'), and of any audits or controls by the Court of Auditors or the Internal Audit Service ('IAS'), without endangering the confidentiality of the investigations.

(5) Pursuant to Principle 8 set out in Annex 1 to EIT Governing Board decision No 1/2020, the “EIT sets up and implements measures to counter fraud and any illegal activities affecting the financial interests of the EU ... by putting in place a sound anti-fraud strategy to improve the prevention, detection and conditions for investigating fraud, and to set out reparation and deterrence measures, with proportionate and dissuasive sanctions”.

#### HAS DECIDED AS FOLLOWS:

##### Article 1

The EIT Anti-Fraud Strategy for the period of 2021-2023, as annexed to this Decision, is hereby adopted.

##### Article 2

This decision repeals and replaces Decision 23/2018 of the EIT Governing Board of 12 July 2018 adopting the Revised EIT Anti-Fraud Strategy its annex (Action Plan).

##### Article 3

This decision shall enter into force on the day of its signature<sup>5</sup>.

*Done in Budapest on 7 May 2021*

Gioia Ghezzi  
Chair of the EIT Governing Board

*Annex: EIT Anti-fraud Strategy 2021 - 2023*

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<sup>5</sup> Adopted by a written procedure on 7 May 2021



A body of the European Union



# EIT Anti-Fraud Strategy 2021 - 2023

Budapest XX April 2021





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# 1. Key abbreviations

AF	Anti-Fraud
CEO	Chief Executive Officer
COO	Chief Operating Officer
Col	Conflict of interests
ECA	European Court of Auditors
EIT	European Institute of Innovation and Technology
EPPO	European Public Prosecutor's Office
GB	EIT Governing Board
HoU	Head of Unit
HR	Human Resources
IAC	Internal Audit Capability
IC	Innovation Communities Unit
IAS	Internal Audit Service of the European Commission
KIC	Knowledge and Innovation Community
OLAF	European Anti-Fraud Office
SB	Supervisory Board of the EIT Knowledge and Innovation Communities
SF	Services and Finance Unit
SI	Strategy and Impact Unit



## 2. Introduction

The European Institute of Innovation and Technology plays a significant role in contributing to Europe's sustainable growth and competitiveness by enhancing the Union's ability to innovate and as an integral part of Horizon Europe, the EU Framework Programme for Research and Innovation. It does so through the integration of higher education, research and business of highest standards.

Since its establishment in 2008, the Institute created an EIT community eco-system and changed the European innovation landscape via its Knowledge and Innovation Communities (KICs). The KICs are highly autonomous and integrated partnerships which bring together leading organisations for higher education, research and businesses. The concept and model of the EIT and its KICs are designed in a way that facilitates and actively encourages synergies and complementarities with EU, national and regional research and innovation activities and programmes.

The EIT KICs bring the European dimension and integrated strategic cooperation approach to regional and international initiatives via their Co-location Centres and RIS hubs. These offer local players the opportunity to closely connect and interact with other partners within EU and outside within the strategic and integrated framework of the EIT KICs aligned with the Horizon Europe and EU policy priorities.

The EIT is financed through a contribution from the general budget of the European Union within the financial envelope from Horizon Europe during the period from 01 January 2021 to 31 December 2027. In particular, the EIT's budget for the seven years will amount for 2.967 billion euro and is financed from contributions from Member States, third countries or public authorities within them and contributions from international bodies or institutions. The KICs also generate revenues from their own assets and activities and royalties from intellectual property rights. The EIT's financial contribution to the KICs' annual Business Plans may cover up to 100% of the total eligible costs of KIC added-value activities. By supporting its Community, EIT also contributes to strengthening their capacity and framework to prevent fraud and corruption.

Any act of fraud and corruption in EIT's activities diminishes funds, assets and other resources necessary to fulfil EIT's mandate. Fraudulent and corrupt practices can also seriously damage EIT's reputation and decrease EU citizens trust in its ability to deliver results and a transparent manner.

### 3. EIT Context

The Governing Board of the EIT adopted its first Anti-Fraud Strategy and the related action plan in October 2015. In same year, EIT appointed an Anti-Fraud Coordinator to coordinate the implementation of the Anti-Fraud Strategy and the related action plan<sup>1</sup> by Decision 18/2015 of the EIT Interim Director.

The overall objective of the EIT's Anti-Fraud Strategy adopted in 2015 was to improve prevention, detection and the conditions for investigations of fraud, and to pursue adequate deterrence and reparation, with proportionate and dissuasive sanctions. While the target of the first Anti-Fraud Strategy (2015-2017) was mainly detection and prevention of fraud and irregularities within the EIT, the revised Anti-fraud Strategy<sup>2</sup> (2018 – 2020) was also focused on enhancing cooperation with the KICs in the field of fraud prevention and detection considering the significant contribution received by the KICs from the EIT, which may cover up to 100% of the total eligible costs of KIC added-value activities.

It should be underlined that among the objectives and actions foreseen by the 2018 – 2020 EIT Anti-Fraud Strategy and action plan, the maintenance and enhancement of an antifraud culture underpinned by high level of awareness, integrity, impartiality and transparency within the KICs, was given *highest priority*. Without the legal certainty fostered by regulatory standards, there might be a significant risk of fraud considering that the KICs are the beneficiaries of over 95% of the EIT budget in grants. As a result, the EIT increased its efforts to enhance the KICs' and its own fraud prevention and detection activities by encouraging them to identify deficiencies in the area of fraud prevention and detection as well as to formally adopt at governance level their strategies and action plans in relation to fraud prevention and detection.

In light of the above, the EIT-KICs' Network on Fraud Prevention and Detection was established in March 2018. The purpose of establishing the AF network was to ensure the proper implementation of the provisions on fraud foreseen under the FPA and SGA, reduce the risk of fraud, and reinforce the EIT and KICs commitment to the highest standards of integrity. Furthermore, it should facilitate the exchange of best practices and reinforce the cooperation in this field between the EIT and the KICs. By doing so, a fraud proof-environment between the KICs and the EIT and within the KIC should be guaranteed.

At the same time, it was identified that the KICs, as independent legal entities, take different approaches towards prevention and mitigating of fraud, depending on their organisational

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<sup>1</sup> See Decision 18/2015 of the EIT Interim Director about OLAF Contact Point and Anti-Fraud Coordinator – October 2015; Decision 5/2017 of the EIT Interim Director on the appointment of the EIT Staff members for various functions and definition of their tasks – April 2017.

<sup>2</sup> 04513.EIT.2018.I.GB.WP



structure, jurisdiction and approach of the management. With the new AF Strategy for 2021-2023 the EIT aims to streamline the AF approach and ensure that all KICs adhere to AF standards.

**The EIT has developed several procedures and policies designated to mitigate identified risks, including fraud risks, namely:**

- A Code of conduct for EIT staff, Governing Board members and experts;
- Declaration of interests for GB members, EIT staff and experts;
- Completed IAC consultancy on conflict of interest risk;
- A transparency policy, whereby the CVs and Dols for GB members, EIT Director and management are published to enable public scrutiny;
- Nominated Anti-Fraud Coordinator and Internal Control Coordinator;
- A comprehensive auditing system: the EIT is subject to regular audits performed by different independent EU bodies: ECA, IAS, IAC, external auditors auditing the Agency's annual accounts;
- EIT Audit Committee;
- A whistle blowing policy for staff;
- EIT – KICs AF Network and developed AF intranet dedicated to the EIT staff and KICs;
- Regular assessment of sensitive functions.

## 4. Guiding principles and standards

The following guiding principles and standards govern the EIT's Anti-Fraud Strategy:

1. Ethics and transparency are key concerns for the EIT activities. The EIT is fully committed to ensure that these principles are applied at highest targeted standards, therefore **EIT has zero tolerance to fraud, irregularities, impropriety or dishonesty, meaning that EIT staff, members of the EIT Governing Board, external experts and consultants working for the EIT, KICs staff and KICs partners benefiting from EIT grants, third parties, and contractors are not to engage in acts of fraud.**

2. **The EIT will report, without delay, any instance of suspected fraud to OLAF.** EIT is committed to preventing, identifying and addressing all acts of fraud against EIT, through raising awareness of fraud risks, implementing cost-effective controls aimed at preventing and detecting fraud, producing swift corrections (including recovery of defrauded funds and judicial/administrative sanctions) and enforcing the EIT's Anti-fraud Strategy.

3. **The EIT will ensure that it is fully transparent on the use of EU funds,** has a timely exchange of information, and communicates effectively internally and externally on the fight against fraud.





In order to address possible conflicts between principles listed above, the following factors shall be taken into account:

- It is not possible to prevent fraud, corruption or any other illegal activity entirely. However, the EIT continues working on the adoption and implementation of strong measures to reduce any existing risk. In this respect, where fraud indicators, including documentary evidence, are observed or there are allegations of fraud, a prompt action on the part of the EIT is required. As a result, OLAF should be informed without delay, precautionary measures may have to be taken, and timely corrective action should be taken as soon as possible. In line with Article 45(2) of EIT's Financial Regulation<sup>3</sup>, *"In the event of any illegal activity, fraud or corruption which may harm the interests of the Union, a member of staff or other servant, including national experts seconded to the Union body, shall inform their immediate superior, the director or the management board of the Union body or the European Anti-Fraud Office or the European Public Prosecutor's Office directly."*
- The reporting of a suspected case of fraud by a staff member should take place in accordance with the EIT Governing Board Decision No.33/2018 of 30 November 2018<sup>4</sup> on Laying down guidelines on whistleblowing and the EIT Director's Decision No.34/2018 of 18 July 2018<sup>5</sup> on Adopting a fraud reporting procedure. Pursuant to article 1.4 of the GB Decision, *"Staff members who make a report in bad faith, particularly if it is based knowingly on false or misleading information...shall be subject to disciplinary measures."*

## 5. Definitions

There is no one widely accepted definition of fraud and it varies among countries and jurisdictions. The term "fraud" is commonly used to describe a variety of dishonest practices. In line with the EU Directive 2017/1371<sup>6</sup> ***fraud is a deliberate act of deception intended for personal gain or to cause a loss to another party.***

In December 2015 it was decided that for the purposes of the EIT Anti-Fraud Strategy, the concept of fraud encompasses both internal and external misbehaviour (i.e. misbehaviour committed by staff members or persons anyhow linked to the EIT or by external parties) and relies on the assumption that the reputational impact of a misbehaviour might be equally important to, or even more important, than the financial damage itself.

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<sup>3</sup> [ARES\(2019\)6810859](#) of 04/11/2019

<sup>4</sup> [ARES\(2018\)6237464](#) of 05/12/2018

<sup>5</sup> Decision 34/2018 of 18/07/2018, reference 04515.EIT.2018.I.IA.

<sup>6</sup> See more in Article 3(2) of Directive (EU) 2017/1371



It covers in particular, but not only, any infringement of the financial interests of the EU as defined by the Convention on the protection of the European Communities' financial interests ('PIF Convention')<sup>7</sup>. It also covers misbehaviour that may not have a direct effect on the EU's financial interests, but has anyhow a reputational impact, such as some cases of forgery (in CVs for example), concealment of material facts, breaches of IT systems, cyber fraud, transmission of confidential information and conflicts of interests that have not been declared intentionally. Favouritism and collusion are also included in the definition of fraud for the purposes of this Anti-Fraud Strategy.

The EIT deems appropriate to maintain this wide definition of fraud for the purpose of the application of this document. This wide definition is shared with the other EU Agencies and serves the purpose of preventing and detecting the highest possible number of illegal behaviours and keeping high the attention of staff members also on instances likely to create a reputational damage.

Examples of fraud and corruption include, but are not limited to, the following actions:

- Forging documents, preparing false entries in EIT systems or making false statements to obtain a financial or other benefit for oneself or another/others;
- Misuse of EIT funds by EIT staff, KICs, and third parties;
- Collusion or other anti-competitive schemes between suppliers during a procurement process;
- Forging the signature of an EIT staff member or forging a document purporting to be from EIT to induce a party outside EIT to act;
- Using another user's IT identity or password, or creating false identities/passwords, without consent or authority to manipulate EIT processes or cause the approval or denial of actions;
- Accepting hospitality such as meals or entertainment from a contractor, third party without declaring it;

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<sup>7</sup> Council Act of 26 July 1995 drawing up the Convention for the protection of the European Communities' financial interests, OJ No C 316 of 27.11.95, p.48.



- Misrepresenting the EIT employment status to obtain a benefit from a national government or private sector;
- Failing to disclose a financial or familial interest in a business or outside party while participating in the award/management of a contract/grant to the benefit of that business or outside party;
- Processing the cost of personal travel as part of an official travel;
- Making misrepresentations, including educational credentials or professional qualifications, on a personal history form in the context of a job application, and
- Falsifying documents, making false statements, preparing false entries in the EIT systems or other deceptive acts to the detriment of those seeks to disfavour, or to discredit a person, a programme, a KIC or the EIT.

The EIT Anti-Fraud Strategy is part of the legal framework of the EIT and meets the requirements of Article 30 of the EIT Framework Financial Regulations of the European Commission which refer inter alia to the need for preventing and detecting irregularities and fraud.

This Strategy shall apply to all EIT activities and operations, including its KICs and their partners, which are funded through the EIT budget:

- I. Governing Board members
- II. EIT staff members
- III. EIT non-staff members: SNEs, trainees, experts, consultants
- IV. EIT KICs' staff and implementing partners
- V. Contractors and other third parties

## 6. Fraud risk assessment

In order to further focus on the risk of fraud and in line with the OLAF's Guidance and Methodology, the EIT carries out a risk assessment (risk logs) including a detailed EIT Unit level risk register to be reviewed twice per year. This risk assessment exercise contains a dedicated part 'EIT Anti-fraud Risk' which is mainly focused on the risk of fraud in the different processes taking place within the EIT.

The fraud risk assessment is conducted once a year. It combines fraud risks identified in the different processes in place within all Units and fraud risks in those functions categorised as sensitive. The fraud risk assessment is mainly focused on the following areas of risk:



- Use of EIT funds by KICs (grants);
- Data security (IT tools/systems);
- Administrative procedures, such as public procurement and recruitment;
- Whistleblowing and overall strengthening of fraud detection measures.

## 7. Objectives and actions

The strategic objectives of the Anti-Fraud Strategy are driven by the EIT's priorities and values. EIT needs to set objectives to counter fraud at all levels within the EIT Community, i.e., the levels of KICs, the Governing Board, the EIT staff and external contractors and thus reinforce the public trust in its activities. The EIT's operational budget is largely stable, KICs benefiting on an annual basis from grant allocations. The process is deemed to change though with the introduction of the multi-annual grants. In this context the EIT's Governing Board has a significant decision-making power as part of the designation of KICs and grant allocation process.

These objectives aim at encompassing all stages of the anti-fraud cycle: prevention, detection, investigation, recovery and sanction. Whilst prevention should remain one of the most important objectives of the revised Anti-Fraud Strategy, it is deemed appropriate to focus the efforts also on detection, in particular by encouraging internal reporting of any possible case of fraud as well as proactive random verifications in some areas, whilst reinforcing the EIT monitoring practices in the EIT's operational activities.

In order to address the identified fraud risks in the preceding section, the following strategic objectives were agreed with the EIT Director:

### Objective No.1

***Maintain and enhance an anti-fraud culture underpinned by high level of awareness, integrity impartiality and transparency within the EIT community.***

EIT reiterates in its 2021-2023 AF Strategy the view that fraud deterrence is facilitated by widespread common understanding and sharing of the ethical values and relevant rules underlining any EIT Community activity.



This objective is inspired by the need to constantly communicate the rules and ethical values of the EU Public service from the highest level to each member staff, including staff employed by the KICs.

EIT has already developed a compulsory “Ethics & integrity, and fraud prevention and detection” training course for all staff that serves the purpose of promoting the values of ethics and integrity amongst staff members. Trainings are also given to the EIT newly recruited staff and GB members.

At the same time EIT developed an AF Network and intranet for further developing EIT KICs’ and their networks awareness on fraud prevention and detection. Enhancing and maintaining KICs employees and their beneficiaries awareness on antifraud measures continues to be of an utmost importance. KICs staff need to have in place not only good governance principles, but also anti-fraud strategies and strong management commitment in implementation of those.

#### Actions to reach objective nr.1<sup>8</sup>

- Maintain regular communication on anti-fraud related matters with EIT staff, GB members, EIT KICs Management, AF SPOCs, their staff and partners.
- Further develop and enhance collaboration within the EIT AF Network.
- Organise and update on regular basis AF trainings and workshops.
- Update the section dedicated to fraud on the EIT staff intranet, make relevant updates on the EIT website and ensure that the antifraud tools are visible on the EIT intranet.

#### Objective No.2

##### ***Enhance the EIT’s controls over the financing, monitoring and evaluation of KIC activities.***

EIT is currently phasing into the EU’s Horizon Europe programme. A reinforced role of the EIT will guide the EIT activities from 2021 to 2027, with a focus on actions where it will add value at the EU level and contribute to achieving the objectives of Horizon Europe.

Following a development of the Horizon Europe legal framework, the EIT will develop a Monitoring and Evaluation Strategy. The reporting and monitoring of the EIT’s KICs’ operational performance and their results will be a primary task of the EIT. The results of the monitoring will feed into the EIT KICs business planning processes, EIT’s decision-making regarding the allocation of the EIT grants to the KICs, and the preparation of the grant agreements with the KICs as beneficiaries.

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<sup>8</sup> For detailed actions, please refer to point 10 of this document “Action Plan”



Therefore, whilst performing the 2021 annual risk assessment exercise at the EIT, it was concluded that improper implementation of EIT-KICs agreements (given the complexity of the KIC concept) in combination with the transition from H2020 to HE may bring very high risk of irregularities and fraud. With setting this operational objective, EIT aims to enhance its controls over the financing, monitoring and evaluation of KIC activities in order to reassure the EU bodies and the EU citizens of the propriety and correct use of EU public funds.

#### Actions to reach objective nr.2<sup>9</sup>

- EIT adopts revised criteria for financing, monitoring and evaluation of the KIC activities, updates the EIT's KIC Grant Assurance Strategy and puts in place additional control measures, including audit activities, as to ensure smooth transition to Horizon Europe and proper implementation new legal provisions by the EIT KICs.
- EIT communicates on regular basis with internal and external stakeholders on modifications and legal framework updates.

EIT enhances its operational monitoring capacity.

#### Objective No.3

***Strengthen measures and focus effort on fraud-risk mitigation in identified areas of the EIT as an organisation, i.e. IT security, procurement and conflicts of interest ('Col').***

Within the past 3 years, EIT has reinforced its fraud-risk mitigating measures. With this strategic objective EIT aims to substantiate the remaining level of risks. EIT would like to focus its efforts on the area of:

- (A) Enhancing procedures and raising awareness on declaration of Col's amongst GB members, EIT management and staff.
- (B) IT Security, in connection to the "new normal" working environment, i.e. extended telework provisions and moving towards an online based working programme.
- (B) Procurement, due to need of putting in place effective and proportionate anti-fraud measures taking into account the risks identified during the annual risk assessment exercise<sup>10</sup>.

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<sup>9</sup> For detailed actions, please refer to point 10 of this document "Action Plan"

<sup>10</sup> [ARES\(2021\)62568](#) of 05/01/2021

Actions to reach objective nr.3<sup>11</sup>

- Continuous monitoring of the internal control effectiveness and measures in place those related to IT systems, procurement procedures and detection of Col.
- Carry out annual fraud risk assessments in the identified areas as part of the annual risk assessment exercise.
- Perform ad-hoc verification and checks when deemed necessary.

## 8. Functions addressing and preventing fraud

The risk of fraud cannot be dealt with in isolation. Addressing and mitigating properly the risk of fraud is a key aspect of sound management. Whilst it is essential that all EIT staff members should have a clear understanding of the EIT's Anti-Fraud Strategy and of its action plan, the EIT has at its disposal the following functions engaged in addressing and preventing fraud:

No.	Function	Unit/Section/External Stakeholder
1	Ethics and Integrity Officer	SF/Governance and HR Section
2	Legal Officers	Director's Office/ IC Unit/Governance and HR Section
3	Internal Control & Anti-fraud Coordinator	Director's Officer
4	Internal controls and ex-post function	Directorate/SF
5	Ex-ante financial verification	SF/Budget and Finance Section/IC
6	Ex-ante procurement verification	SF/Procurement and logistics Section
7	EIT management – COO, HoUs	EIT Units

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<sup>11</sup> For detailed actions, please refer to point 10 of this document "Action Plan"



8	EIT Director	Director's Office
9	Internal Audit	Internal Audit Service of the Commission
10	EIT KICs' AF KICs SPOCs	All EIT KICs
11	EIT KICs' CEO, COO, CFO, SB	All EIT KICs
12	EIT Audit Committee	EIT GB members
13	External Auditors	European Court of Auditors
14	Fraud Investigators	OLAF, EPPO

## 9. Review and Monitoring

The Anti-Fraud Coordinator will ensure that the EIT's approach to managing the risk of fraud is kept up to date with developments in best practice and legislative requirements. The Anti-Fraud Strategy and its action plan will be reviewed every 3 years.

The implementation of the EIT's Anti-Fraud Strategy, policy and procedures will be subject to periodic review on the basis of an evaluation of the impact of the Strategy, measured using the key performance indicators developed, among which for example the number of cases notified to OLAF for investigation, number of notified cases dismissed by OLAF, number of internal reporting about suspicious behaviours received.

## 10. Action Plan

### Action Plan for 2021 – 2024





AF Measure & Action	Responsible	Deliverable	Due date
<p><b>(O1<sub>1</sub>)</b> Maintain regular communication with staff, members of the Governing Board of the EIT and KICs on anti-fraud related matters through:</p> <ul style="list-style-type: none"> <li>- Annual Activity Report;</li> <li>- Compulsory in-house trainings to EIT staff;</li> <li>- Awareness session to the newly appointed members of the Governing board and EIT staff;</li> </ul> <p>Perform surveys on anti-fraud and ethics knowledge and organise trainings according the results.</p>	<p>Anti-Fraud Coordinator, Ethics &amp; Integrity Officer in cooperation with the EIT Directorate</p>	<p>(a) Coordination of the AAR;</p> <p>(b) Survey on anti-fraud &amp; ethics and integrity;</p> <p>(c) Ethics &amp; AF trainings held;</p> <p>(d) Awareness session to new GB members</p>	<p>Permanent action, by end of each calendar year</p>
<p><b>(O1<sub>2</sub>)</b> Maintain regular communication and cooperation with OLAF and report to the EIT Governing Board on ongoing and closed OLAF cases/investigations.</p>	<p>Anti-Fraud Coordinator and EIT Director</p>	<p>Organisation of at least 2 sessions per year for EIT GB on ongoing closed sessions</p>	<p>Permanent action, by end of each calendar year</p>
<p><b>(O1<sub>3</sub>)</b> Maintain the EIT staff intranet on anti-fraud more visible, for the EIT</p>	<p>Anti-Fraud Coordinator</p>	<p>Updated AF intranet at least 2 times per year</p>	<p>Q4 2021; Q2 2022; Q4 2022; Q2 2023; Q4 2023.</p>



staff and for the KICs AF SPOCs.			
(O1 <sub>4</sub> ) Adopt a policy on Conflict of Interest for the staff of the EIT.	Ethics & Integrity Officer	GB Decision on on Guidelines on conflict of interest	Q2 2021
(O1 <sub>5</sub> ) Publish on the EIT's website the DoIs of EIT's GB members and EIT management	COMs Unit in cooperation with the EIT Director's Office	Published DoIs of EIT GB members and EIT management team on EIT's website	Annually
(O1 <sub>6</sub> and O2 <sub>6</sub> ) All EIT KICs adopt Anti-Fraud Strategies	EIT KICs	All EIT KICs adopt AF Strategies	Q4 2021
(O1 <sub>7</sub> and O2 <sub>7</sub> ) Organise regular EIT & KICs Anti-fraud network meetings and exchange good AF practices	Anti-fraud coordinator with EIT KICs SPOCs	Minutes of the EIT & KICs Anti-fraud network meetings	Annually, at least 3 times per year
(O2 <sub>8</sub> ) All EIT KICs update and approve Procurement, and HR policies	IC Unit, GB members	Report on EIT GB and KIC management meetings	Q3 2021 & Q3 2022
(O2 <sub>9</sub> ) The EIT Monitoring and Evaluation Strategy is updated and aligned with the EIT SIA and Regulation (2021 – 2027), Horizon Europe legislative package and the EIT Impact Framework as well as with the following <u>underlying principles and concepts</u> :  ✓ KIC financial sustainability	HoU SI, HoU IC	Updated and approved EIT Monitoring and Evaluation Strategy	Q2 2022



<ul style="list-style-type: none"> <li>✓ KIC financing, monitoring and evaluation</li> <li>✓ EIT RIS implementation framework</li> <li>✓ EIT label framework</li> <li>✓ HEI initiative framework</li> <li>✓ Cross-KIC strategic framework</li> </ul>			
<p>(O2<sub>10</sub>) The EIT Grant Assurance strategy is updated and aligned with the EIT SIA and Regulation (2021 – 2027),</p>	HoU IC	Updated and approved EIT Grant Assurance Strategy	Q1 2022
<p>(O2<sub>11</sub>) EIT enhances its operational monitoring capacity</p>	EIT Director in coordination with the EIT COO and HoU IC & HoU SI	Report on KICs activities	Q4 2022
<p>(O2<sub>12</sub>) EIT puts in place control measure to ensure smooth transition to new Horizon Europe framework, including the multi-annual grants allocation, by:</p> <ul style="list-style-type: none"> <li>- Regular communication with internal and external stakeholders;</li> <li>- Timely transition to EC IT tools for</li> </ul>	Innovation Communities, EIT COO, Legal Officers	<p>EC IT tools for management of grants in use;</p> <p>Report on workshops organises</p> <p>Updated HE templates for EIT KICs &amp; community in use</p>	<p>Q1 2022</p> <p>Q4 2021</p> <p>Q1 2022</p>



<p>grant management;</p> <ul style="list-style-type: none"> <li>- Timely and accurate legal revision of the updated templates to be used by EIT Community;</li> <li>- Organise events and workshops to explain and inform on the legal and operational updates to EIT community.</li> </ul>			
<p><b>(O3<sub>13</sub>)</b> Carry out annual fraud-specific risk assessments.</p>	<p>Anti-fraud Coordinator in cooperation with the EIT HoUs</p>	<p>Adopted AF risk register</p>	<p>Permanent action, by end of each calendar year</p>
<p><b>(O3<sub>14</sub>)</b> Annual assessments of the adequacy and effectiveness of the internal control system in place; where additional control needs have been identified to design and implement additional controls and tools.</p>	<p>Internal Control Coordinator</p>	<p>Report on annual assessment of the EIT's internal control system.</p>	<p>Annually, by Q2 of year n+1 for year n</p>
<p><b>(O3<sub>15</sub>)</b> Maintain and enhance IT Security by:</p> <ol style="list-style-type: none"> <li>1. Adopting IT SOP on access management;</li> <li>2. Implementation of the EIT Security Policy and</li> </ol>	<p>ICT Section</p>	<p>Updated IT SOPs Report on implementation of EIT Security Policy</p>	<p>Q2 2021 Continuous</p>



<p>adaption to the “new normal”;</p> <p>3. Performing annual IT inventories;</p> <p>4. Holding Regular ITSCs.</p>		<p>Report on annual IT inventory approved by RAO</p> <p>Minutes of the ITSCs meetings</p>	<p>Annually, by end of Q4</p> <p>On a quarterly basis</p>
<p><b>(O3<sub>16</sub>)</b> Update EIT procurement SOPs and raise awareness to EIT staff on public procurement rules via regular info sessions and trainings.</p>	<p>Procurement Section</p>	<p>Updates procurement SOPs</p> <p>Procurement training / info sessions</p>	<p>SOPs – by Q2 2021;</p> <p>Continuous</p>
<p><b>(O3<sub>17</sub>)</b> Perform administrative inquiries where required or appropriate</p>	<p>Enquiries to be nominated on an ad hoc basis by the EIT Director or GB members</p>	<p>Report on administrative queries.</p>	<p>As needed</p>
<p><b>(All)</b> Prepare an Activity Report for implementation of the actions during 2021 – 2023 Anti-Fraud strategy.</p>	<p>Anti-Fraud Coordinator</p>	<p>Activity Report 2021-2023</p>	<p>Q2 2024</p>