



ANNEX C1bis: Twinning Light Fiche ¹

Project title: Operational Strengthening of Montenegro's AFCOS System for the Protection of the EU Financial Interests

Beneficiary administration: Ministry of Finance, Department for protection of the EU's financial interests/AFCOS

Twining Reference: ME 25 IPA FI 01 26 TWL

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EU funded project

TWINNING TOOL

¹ For Twinning Light, the project Fiche should be detailed as it will form an annex to the Twinning Light Grant Contract together with the selected Member State proposal. The Twinning Light project Fiche, besides all the data and information mentioned under section 2.1.1, provide also concrete indications on how the work plan should be established, on the suggested schedule of activities, on the profile of short-term experts and on indicators and targets that should be used to ensure the timely achievement of the mandatory results.

LIST OF ABBREVIATIONS

AFCOS – Anti-Fraud Coordination Service

EC – European Commission

EPPO – European Public Prosecutor’s Office

EU – European Union

FFPA – Framework Financial and Partnership Agreement

IBFM – Intermediate Body for Financial Management

IBPM – Intermediate Body for Policy Management

IMS – Irregularity Management System

IPA II – Instrument for Pre-Accession Assistance II

IPA III – Instrument for Pre-Accession Assistance III

NAFS – National Anti-Fraud Strategy

OLAF – European Anti-Fraud Office

PIF Directive – Directive (EU) 2017/1371 on the fight against fraud to the Union’s financial interests by means of criminal law

PRAG – Practical Guide to Contract Procedures for European Union External Actions

SDGs – Sustainable Development Goals

SAA – Stabilisation and Association Agreement

TWL – Twinning Light

1. Basic Information

1.1 Programme: IPA III Action Programme for 2025-2027 Montenegro — Direct management (IPA 2025)

1.2 Twinning Sector: Finance, Internal market and economic criteria

1.3 EU funded budget: Max 250.000 €

1.4 Sustainable Development Goals (SDGs): Sustainable Development Goal 16 – Peace, Justice and Strong Institutions

2. Objectives

2.1 Overall Objective

Reinforcing Operational and Preventive Anti-Fraud Mechanisms within Montenegro's AFCOS System.

2.2 Specific Objective

Strengthened operational and preventive anti-fraud capacity of the AFCOS system through the development of practical irregularity and fraud management tools, enhanced institutional coordination and cooperation with OLAF, strengthened reporting and procedural frameworks, and increased awareness and capacities of relevant stakeholders involved in the protection of EU financial interests.

2.3 The elements targeted in strategic documents i.e. National Development Plan/Cooperation Agreement/Association Agreement/Sector reform strategy and related Action Plans

Relations between Montenegro and the European Union are governed by the Stabilisation and Association Agreement (SAA), which entered into force on 1 May 2010 and provides the legal framework for political dialogue, regional cooperation, economic relations and the use of EU financial assistance. The SAA establishes Montenegro's obligation to align its legal and institutional framework with EU standards, including in the area of protection of the EU financial interests.

The activities envisaged under this Twinning Light project are directly linked to Chapter 32 – Financial Control, which was provisionally closed in January 2026. Chapter 32 encompasses public internal financial control, external audit, protection of the EU's financial interests and protection of the euro from counterfeiting.

The project is also aligned with Chapter 22 – Regional Policy and Coordination of Structural Instruments, as effective protection of EU financial interests is a precondition for sound management of IPA III funds and future Structural and Cohesion Funds.

Furthermore, the project is consistent with the Framework Financial and Partnership Agreement (FFPA) signed between Montenegro and the European Commission, which obliges Montenegro to ensure effective systems for prevention, detection and reporting of irregularities and fraud, including reporting through the Irregularity Management System (IMS).

Furthermore, the project is consistent with the Reform and Growth Facility Agreement, signed between Montenegro and the European Commission, which obliges Montenegro to ensure

effective systems for prevention, detection and reporting of irregularities and fraud, including reporting through the Irregularity Management System (IMS).

The Action Document under IPA III identifies the need for strengthening operational tools, enhancing IMS reporting procedures (including for the Reform and Growth Facility), and raising awareness among stakeholders and the general public regarding protection of EU financial interests.

At national level, the project contributes to the implementation of the National Anti-Fraud Strategy for the Protection of the European Union's Financial Interests (NAFS) 2025–2028, adopted by the Government of Montenegro together with its Action Plan 2025–2026. This strategic document defines key policy objectives aimed at strengthening the institutional, operational and preventive capacities of the AFCOS system and improving coordination among institutions responsible for protecting EU financial interests.

The action also builds on the results of the Strategy for Combating Fraud and Management of Irregularities for the Protection of EU Financial Interests for the period 2019–2022, whose evaluation provided recommendations for strengthening the AFCOS system, improving irregularity management procedures and enhancing administrative capacities.

In addition, the project is consistent with the Public Finance Management Reform Programme 2022–2026, which includes measures aimed at strengthening internal control systems, improving risk management and reinforcing mechanisms for prevention and detection of irregularities and fraud in the management of EU funds.

3. Description

3.1 Background and justification

In accordance with Article 12a of Regulation (EU) No 883/2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF), Montenegro has designated an Anti-Fraud Coordination Service (AFCOS) within the Ministry of Finance². The AFCOS has a coordinating role in legislative, administrative and operational activities related to the protection of EU financial interests and serves as the main contact point for OLAF. The AFCOS system in Montenegro consists of three levels: the AFCOS as coordinating body, the IPA structure (implementing agencies and bodies managing EU funds), and the AFCOS network comprising institutions responsible for combating fraud, corruption and other irregularities.

Although Montenegro has established the necessary legal and institutional framework, practical challenges remain. These include the need for more structured operational tools for detecting and managing irregularities, clearer procedures for handling suspected fraud cases and cooperation during OLAF on-the-spot checks, further improvement of IMS reporting practices, especially in the context of new instruments such as the Reform and Growth Facility, and enhanced public awareness and visibility of AFCOS activities. In accordance with Title IV of the Facility Agreement (Protection of the Financial Interests of the Union), Montenegro is required to ensure that an effective and efficient internal control system is in place, that suspected cases of

² Within the Ministry of Finance of Montenegro, the Department for protection of EU's financial interests (AFCOS), hereinafter referred to as "AFCOS", is established.

irregularities, fraud, corruption and conflicts of interest are reported without delay to the Commission, OLAF and, where applicable, EPPO, and that EU institutions are granted full access to documentation, data and premises for the purposes of audits, verifications and on-the-spot checks. Operational clarification of these obligations within the AFCOS system remains necessary.

Targeted support through a Twinning Light project is appropriate to draw on EU Member States' best practices, strengthen practical capacities, and ensure sustainable improvements.

The legal and institutional framework for the protection of the European Union's financial interests in Montenegro is established through a number of national legal acts. Key legislation includes the Criminal Code, which defines criminal offences related to fraud, corruption and misuse of public funds; the Criminal Procedure Code, regulating procedures for investigation and prosecution of criminal offences; the Law on Liability of Legal Entities for Criminal Offences; and the Law on International Legal Assistance in Criminal Matters.

In addition, the project is aligned with the Law on Prevention of Corruption and the Law on Management, Internal Control and Internal Audit in the Public Sector, which further strengthen the national framework for transparency, integrity and accountability in the management of public and EU funds. These legal acts enhance mechanisms for preventing and detecting corruption, managing conflicts of interest, protecting whistleblowers and reporting irregularities, thereby contributing to the effective safeguarding of the European Union's financial interests in line with EU standards.

3.2 Ongoing reforms

Montenegro has continued to implement reforms aimed at strengthening the legal, institutional and operational framework for the protection of the European Union's financial interests. The Strategy for the Fight against Fraud and Management of Irregularities for the Protection of EU Financial Interests (NAFS) for the period 2025–2028, with its Action Plan for 2025–2026 is in place. The NAFS was prepared in line with national strategic planning methodology and OLAF Guidelines for Developing National Anti-Fraud Strategies. This ensured alignment with EU standards and reinforced political commitment to further strengthening the AFCOS system. In parallel, harmonization of the Criminal Code with Directive (EU) 2017/1371 (PIF Directive) was completed in 2025, following a comprehensive GAP analysis and preparation of concordance tables. This reform represents a significant step towards full compliance with EU standards in the area of protection of the Union's financial interests and contributed to fulfilling key benchmarks under Chapter 32 – Financial Control.

Operationally, the Guidelines for Irregularity Management were updated to reflect the IPA III programming period and endorsed by the National Authorising Officer in January 2026. Their incorporation into the Manual of Procedures ensures a harmonized framework for detection, reporting and follow-up of irregularities within the IPA structure.

Capacity building has also been strengthened - training needs analysis for IPA officials was conducted within the Public Finance Management Reform Programme 2022–2026, resulting in the development of a Training Plan and Training Catalogue (2025–2028) for AFCOS system staff. Specialised trainings on risk management, anti-fraud policy and use of the Irregularity Management System (IMS) were delivered, with further sessions planned in accordance with the Training Catalogue.

Looking ahead, further measures are envisaged under the NAFS 2025–2028, including the preparation of the Action Plan for the period 2027–2028, with particular emphasis on the implementation of obligations arising from the Reform and Growth Facility. This will entail ensuring full compliance with Articles 9, 10 and 11 of the Facility Agreement, notably with regard to reporting obligations, structured cooperation with OLAF and EPPO, protection of whistleblowers, prevention and management of conflicts of interest, and the systematic follow-up of primary administrative or judicial findings, alongside the continued refinement of fraud risk assessment tools.

In addition, the upcoming Communication Strategy for the protection of EU financial interests for period 2026 -2029 foresees structured awareness-raising activities, including public events, expert conferences, development of informational materials and strengthening of communication procedures between AFCOS bodies and the public. These measures aim to reinforce preventive capacity and improve transparency and reporting culture. The impact of these activities will be measured through a combination of quantitative and qualitative indicators, including the number of communication activities implemented, reach and engagement metrics of digital content, number of institutions and stakeholders involved, as well as changes in the level of public awareness and number of reported irregularities, based on surveys and monitoring data.

Despite the progress achieved, further support is required to operationalise newly adopted strategic documents, consolidate practical anti-fraud tools and ensure sustainable implementation of reforms. The proposed Twinning Light project will directly contribute to this next phase of reform.

3.3 Linked activities

AFCOS was supported by the following Twinning Light projects:

1. Capacities Development for the Anti-Fraud Coordination Service (AFCOS)

Twining number: MN 15 IPA OT 03 18 TWL; implementation period: September 2018 - March 2019 (6 months); budget: EUR 200,000; implementing partner: Ministry of Finance of the Republic of Croatia with the support of Central Finance and Contacting Agency (CFCA)

Main components: (1) strengthening the institutional set-up and legal framework of the AFCOS and the AFCOS Network, and (2) increasing administrative capacities and public awareness on anti-fraud issues.

2. Improving the Capacities of the AFCOS System Bodies in the Field of Irregularities Management

Twining number: MN 20 IPA FI 01 22 TWL; implementation period: January 2023 - September 2023 (8 months); budget: EUR 100,000; implementing partner: Republic of Greece, specifically the National Transparency Authority, with the support of the Centre for International and European Economic Law.

The project aimed to strengthen the administrative capacities of the entire AFCOS system in the field of irregularities management and protection of the EU financial interests.

Main components: 1) evaluation of the Strategy for the Fight against Fraud and Management of Irregularities 2019–2022; 2) organisation of trainings and seminars for representatives of the

irregularity reporting structure, the IPA management structure and institutions responsible for combating fraud, corruption and other illegal activities within the AFCOS Network.

3. Further Enhancing the Functioning of the Montenegrin AFCOS System for the Effective Protection of the EU Financial Interests”

Twinning number: MN 22 IPA FI 01 24 TWL; implementation period: September 2024 - July 2025 (10 months), budget EUR 250,000; implementing partner: Ministry of Finance of the Republic of Croatia with the support of Central Finance and Contacting Agency (CFCA)

Main components: 1) development of strategic and legislative framework to support the closure of Chapter 32 – Financial Control; 2) the enhancement of irregularity and fraud management capacities through specialised trainings.

This project will build on these achievements, focus on plugging the gaps in the system and further develop the AFCOS structure.

3.4 List of applicable Union acquis/standards

1. Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council of 11 September 2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF) and repealing Regulation (EC) No 1073/1999 of the European Parliament and of the Council and Council Regulation (Euratom) No 1074/1999;
2. Council Regulation (EURATOM, EC) No 2185/96 of 11 November 1996 concerning on-the-spot checks and inspections carried out by the Commission in order to protect the European Communities' financial interests against fraud and other irregularities;
3. Commission Regulation (EC) No 1681/94 of 11 July 1994 concerning irregularities and the recovery of sums wrongly paid in connection with the financing of the structural policies and the organization of an information system in this field;
4. Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union;
5. Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union;
6. Directive (EU) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law;
7. Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office ('the EPPO');
8. Decision (EU) 2019/1798 of the European Parliament and of the Council of 23 October 2019 appointing the European Chief Prosecutor of the European Public Prosecutor's Office;
9. Commission Implementing Regulation (EU) 2021/2236 of 15 December 2021 on the specific rules for implementing Regulation (EU) 2021/1529 of the European Parliament and of the Council establishing an Instrument for Pre-accession Assistance (IPA III);
10. Regulation (EU) 2021/1529 of the European Parliament and of the Council of 15 September 2021 establishing the Instrument for Pre-Accession assistance (IPA III);
11. Regulation (EU) no 231/2014 of the European Parliament and of the Council of 11 March 2014 establishing an Instrument for Pre-accession Assistance (IPA II);
12. Commission Implementing Regulation (EU) No 447/2014 of 2 May 2014 on the specific rules for implementing Regulation (EU) No 231/2014 of the European Parliament and of the Council establishing an Instrument for Pre-accession assistance (IPA II);

13. Practical Guide to contract procedures for European Union external actions (PRAG);
14. Regulation (EU) no 236/2014 of the European Parliament and of the Council of 11 March 2014, laying down common rules and procedures for the implementation of the Union's instruments for financing external actions;
15. Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council of 25 October 2012 on the financial rules applicable to the general budget of the Union and repealing Council Regulation (EC, Euratom) No 1605/2002;
16. Commission delegated regulation (EU) No 1268/2012 of 29 October 2012 on the rules of application of Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council on the financial rules applicable to the general budget of the Union;
17. Facility Agreement between the European Union represented by the Commission and Montenegro represented by the Government of Montenegro on specific arrangements for implementation of Union support to Montenegro under the Reform and Growth Facility;
18. Loan Agreement between the European Union and Montenegro under the Reform and Growth Facility.

3.5 Components and results per component

COMPONENT I – Strengthening operational and strategic framework for effective protection of EU financial interests

Result 1: Strengthened operational anti-fraud framework within the AFCOS system

The following indicative sub-results will be achieved:

Sub-Result 1.1: National Anti-Fraud Strategy's Action Plan 2027–2028 developed in line with Government Guidelines for strategic documents and OLAF recommendations;

Sub-Result 1.2: Fraud Prevention and Detection Checklist for EU-Funded Projects with Practical Guidance Manual developed;

Sub-Result 1.3: Developed Methodology for handling irregularity and suspected fraud cases and reporting via IMS, in the context of the Reform and Growth Facility;

Sub-Result 1.4: Awareness-raising public event organised

COMPONENT II – Capacity building of AFCOS system stakeholders through practical anti-fraud training

Result 2: Increased operational capacity of AFCOS system stakeholders, including local self-government, in the prevention, detection and reporting of irregularities and fraud, as well as in cooperation with OLAF

The following indicative sub-results will be achieved:

Sub-Result 2.1: Enhanced practical skills of AFCOS system staff and IPA structure in detecting, classifying and reporting irregularities and fraud

Sub-Result 2.2: Strengthened capacities of public officials at central and local self-government level in applying EU anti-fraud requirements and tools in the management of EU-funded projects

Sub-Result 2.3: Improved knowledge and practical application of fraud risk assessment and prevention mechanisms within the AFCOS system;

Sub-Result 2.4: Enhanced capacity of judges and prosecutors in the protection of the EU financial interests and cooperation with EPPO

3.6 Expected activities

COMPONENT I – Strengthening operational and strategic framework for effective protection of EU financial interests

Result 1: Strengthened operational anti-fraud framework within the AFCOS system

ACTIVITIES:

Sub-Result 1.1: National Anti-Fraud Strategy’s Action Plan 2027–2028 developed

A.1.1.1. An in-depth analysis of the implementation of the current National Anti-Fraud Strategy will be conducted, including assessment of achieved indicators, identified gaps, and recommendations emerging from previous evaluations. The analysis will include structured consultations with representatives of the AFCOS, AFCOS Network members and IPA structure;

A.1.1.2. Based on the analysis, a comprehensive draft Action Plan (2027–2028) will be prepared. The Action Plan will define clearly measurable activities, institutional responsibilities, deadlines and output and outcome indicators in line with Government guidelines for strategic documents. The Action Plan will also be based on the results of the “Fraud risk analysis with statistical analysis of irregularity cases, in the context of implementing projects financed from IPA funds” (to be developed by AFCOS in 2026), ensuring full coverage of the remaining period of the NAFS and alignment with OLAF recommendations.

Sub-Result 1.2: Fraud Prevention and Detection Checklist for EU-Funded Projects with Practical Guidance Manual developed

A.1.2.1. A comparative analysis of EU Member State practices in fraud prevention and detection throughout the project lifecycle will be conducted, with a view to identifying best practices and applicable red flag indicators;

A.1.2.2. Based on the analysis, a comprehensive Fraud Prevention and Detection Checklist for EU-funded projects will be developed, incorporating red flag indicators and structured control points applicable to procurement procedures, grant award processes, contract implementation, and verification of payment claims;

A.1.2.3. A Practical Guidance Manual will be prepared as an integral part of the tool, defining verification steps, documentation requirements, risk indicators and control measures to be assessed prior to validating each checklist item;

A.1.2.4. The Checklist and the Practical Guidance Manual will be tested through a dedicated practical workshop involving representatives of IPA structure.

Sub-Result 1.3: Developed Methodology for handling irregularity and suspected fraud cases and reporting via IMS, in the context of the Reform and Growth Facility.

A.1.3.1. Mapping of existing procedures for detection, preliminary assessment and reporting of irregularities and suspected fraud cases will be conducted, including identification of procedural gaps, bottlenecks and overlaps;

A.1.3.2. A detailed Methodology for handling irregularity and suspected fraud cases will be developed, which includes specific provisions on reporting obligations to the European

Commission and OLAF in line with the Reform and Growth Facility Agreement and clearly defines roles and responsibilities of the AFCOS, Irregularity Officers, IBFM/IBPMs and other relevant institutions;

A.1.3.3. Specific guidance will be included on the structured use of the Irregularity Management System (IMS), documentation standards, timelines, communication channels with EU institutions, and follow-up of reported cases in the context of the Reform and Growth Facility.

Sub-Result 1.4 Awareness-raising public event organised

A.1.4.1 One national public event organised with participation of AFCOS system institutions, civil society organisations and media. The event will focus on the importance of protecting EU financial interests and promoting zero fraud tolerance.

COMPONENT II – Capacity building of AFCOS system stakeholders through practical anti-fraud training

Result 2: Increased operational capacity of AFCOS system stakeholders, including local self-government, in the prevention, detection and reporting of irregularities and fraud and in cooperation with OLAF.

ACTIVITIES:

Sub-Result 2.1: Enhanced practical skills of AFCOS system staff and IPA structure in detecting, classifying and reporting irregularities and fraud.

A.2.1.1. A practical training will be delivered focusing on detection, classification and reporting of irregularities and fraud in EU-funded projects. The training will be based on real case scenarios and simulation exercises, covering identification of red flags, classification of irregularities, documentation requirements and reporting through the Irregularity Management System (IMS). It will also include elements of financial forensics tailored for non-financial staff, enabling participants to identify anomalies in financial data, detect suspicious transactions and better understand financial evidence in the context of fraud cases.;

A.2.1.2. Study visit for 6/7 officials to EU Member State in order to acquire hands on experience of the modus operandi regarding on-the spot controls and anti-fraud measures. The study visit will focus on the practical application of tools and methodologies developed during the Twinning project, such as the Fraud Prevention and Detection Checklist and related guidance, enabling participants to gain hands-on insight into their implementation in an EU Member State context.

Sub-Result 2.2: Strengthened capacities of public officials at central and local self-government level in applying EU anti-fraud requirements and tools in the management of EU-funded projects

A.2.2.1. A targeted training will be delivered for public officials involved in the implementation and management of EU-funded projects, with particular focus on local self-government units acting as beneficiaries, contracting authorities or implementing bodies under programmes such as IPA III, cross-border cooperation and IPARD. The training will cover EU anti-fraud requirements, practical identification of irregularities, prevention measures and reporting obligations. Particular attention will be given to risks specific to project implementation level, including procurement, contract management and conflict of interest situations.

Sub-Result 2.3: Improved knowledge and practical application of fraud risk assessment and prevention mechanisms

A.2.3.1. A specialised training will be delivered on fraud risk assessment and prevention in EU-funded programmes, focusing on practical methodologies for identifying, analysing and mitigating risks;

A.2.3.2. The training will cover the use of risk indicators (“red flags”), with specific attention given to prevention and detection of conflict of interest situations, particularly in procurement and project implementation.

Sub-Result 2.4: Enhanced capacity of judges and prosecutors in the protection of the EU financial interests and cooperation with EPPO

A.2.4.1. A specialised training session will be delivered for judges and prosecutors on the legal framework for the protection of the EU financial interests, including relevant EU legislation, national criminal provisions and obligations arising from the Reform and Growth Facility Agreement;

A.2.4.2. The training will address practical aspects of cooperation with the European Public Prosecutor’s Office (EPPO), including referral mechanisms, exchange of information, interaction between administrative findings and criminal proceedings, and handling of cases involving EU-funded projects.

A.2.4.3. A practical case-based session will be incorporated into the training, focusing on scenarios involving suspected fraud, corruption and conflict of interest affecting EU funds.

3.7 Means/input from the EU Member State Partner Administration:

One of the experts may act as the Project Leader responsible for general coordination.

3.7.1 Profile and tasks of the Project Leader

Qualifications and skills of PL:

- University level education or equivalent professional experience of 8 years in public administration;
- Computer literacy;
- Working level of English language (oral and written);
- Presentation, communication and organizational skills.

Specific requirements:

- Proven experience in strategic project management and coordination of EU-funded or institution-building projects;
- Demonstrated capacity to lead multidisciplinary expert teams;
- Experience in cooperation with OLAF regarding irregularities and fraud;
- Minimum 3 years of experience in institution building in the field of combating irregularities and fraud;
- Experience in working within the public administration/s in the EU Member States, or candidate countries in the areas relevant to this TWL project;
- Knowledge of legislation related to the protection of EU financial interests;

Tasks of the Project Leader:

- Overall management and coordination of the project, in cooperation with Beneficiary Country Project Leader;
- Cooperation with main beneficiary and representatives of bodies in AFCOS system in undertaking all activities;
- Coordinating and ensuring sound implementation of envisaged activities;
- Providing professional advice to main beneficiary and representatives of bodies in AFCOS system during the project implementation period;
- Ensuring backstopping and financial management of the project in Member State Project reporting.

3.7.2 Profile and tasks of Component Leaders

Qualifications and skills of Component Leaders:

- University degree or equivalent professional experience of at least 8 years in public administration, law, economics, finance or related fields;
- Working level of English language (oral and written);
- Computer literacy;
- Strong analytical, organisational and communication skills;

Specific professional experience:

- Minimum 3 years of relevant experience in at least one of the following areas:
 - o protection of the European Union's financial interests;
 - o irregularity and fraud management;
 - o development of anti-fraud policies, methodologies or operational tools;
 - o implementation of training programmes related to anti-fraud, risk management or public financial control;
- Practical experience in cooperation with EU institutions (in particular OLAF and/or EPPO) is considered an asset;
- Experience in development of operational guidelines, manuals or procedures is considered an asset.

Tasks of the Component Leaders:

- Coordinate the planning, organisation and implementation of activities under their respective component;
- Ensure coherence between activities, results and deliverables, in line with the project objectives;
- Supervise and guide short-term experts in the preparation and delivery of outputs, including methodologies, tools and training programmes;
- Ensure quality control of deliverables, including operational documents such as the Fraud Prevention and Detection Checklist, Practical Guidance Manual and training materials;

- Facilitate coordination and communication with the beneficiary institutions, including AFCOS, IPA structure and local self-government representatives

3.7.3 Profile and tasks of other short-term experts:

Qualifications and skills of the Short-term experts:

- University level education or equivalent professional experience of 8 years in public administration
- At least 3 years of experience in implementing EU legislation on combating irregularities and fraud with purpose of protection of EU financial interests
- Computer literacy
- Working level of English language (oral and written)
- Presentation, communication and organizational skills
- Experience in development and delivery of trainings

Specific requirements:

Experience in:

- Knowledge of legislation related to the protection of EU financial interests (including PIF Directive (EU) 2017/1371);
- Irregularity and fraud management
- Cooperation with OLAF and/or EPPO
- Monitoring & evaluation of public policies or programmes related to the protection of the Union's financial interests
- Awareness raising and/or public relations and communicating with the media representatives
- Development and delivery of trainings is an asset
- Minimum of 3 years of professional experience in monitoring and evaluating government strategies/programmes/projects in the area related to the protection of EU financial interests

Tasks of the Short-term experts:

- Designing and delivering specialised training sessions for judges and prosecutors covering the EU legal framework, national criminal provisions and referral mechanisms in cases involving EU-funded projects;
- Preparing training materials and conducting trainings regarding managing irregularities and fraud
- Close cooperation with the main beneficiary and representatives of bodies of the AFCOS system in undertaking relevant activities

4. Budget

The total budget of this Twinning Light project is maximum 250.000 €.

5. Implementation Arrangements

5.1 Implementing Agency responsible for tendering, contracting and accounting

DELEGATION OF THE EUROPEAN UNION TO MONTENEGRO

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5.2 Institutional framework

Beneficiaries of the project are institutions involved in the Montenegrin AFCOS system. The system consists of three interrelated levels: the AFCOS within the Ministry of Finance, the IPA structure (IBFM/IBPMs and bodies managing EU funds), and institutions responsible for combating fraud, corruption and other forms of irregularities (AFCOS Network).

The main beneficiary of this Twinning Light project is the Ministry of Finance – Department for Protection of EU's Financial Interests/AFCOS, which acts as the coordinating body of the AFCOS system and the official contact point for OLAF.

Other beneficiaries include bodies managing EU funds under IPA III and the Reform and Growth Facility, as well as members of the AFCOS Network, including the Ministry of Justice, Ministry of European Affairs, Ministry of Interior, Police Administration, Revenue Administration and Customs Administration, Audit Authority, Agency for Prevention of Corruption, State Prosecutor's Office, Ministry of Agriculture, Forestry and Water Management, Directorate for Payments, Ministry of Public Works, Employment Office, Ministry of Labour, Employment and Social Dialogue and the Ministry of Tourism, Ecology, Sustainable Development and Development of the North.³

In accordance with Title IV of the Reform and Growth Facility Agreement, all institutions involved in the management and control of EU funds are required to ensure effective internal control systems, timely reporting of irregularities and suspected fraud, and structured cooperation with the European Commission, OLAF, EPPO and the European Court of Auditors. The Twinning Light project will support operational clarification and coordination mechanisms within the AFCOS system to ensure full compliance with these obligations.

The AFCOS currently operates with a limited number of staff and performs a coordinating role across the system. Effective cooperation between the AFCOS and other institutions is essential for ensuring sound financial management and protection of EU financial interests.

A Project Steering Committee will be established at the beginning of the project to ensure strategic guidance and monitoring of implementation. It will be composed of representatives of the AFCOS, selected members of the AFCOS Network and the EU Delegation. In line with the provisions applicable to Twinning Light projects under direct management, the EUD - acting as Contracting

³ This list is non/exhaustive

Authority, will ensure contractual oversight of the action. The Steering Committee will meet at least 2 times during the project implementation period to review progress and validate key deliverables. Ad hoc meetings can be organised if needed.

Day-to-day coordination of activities will be ensured by the AFCOS in close cooperation with the Member State Project Leader.

5.3 Counterparts in the Beneficiary administration

5.3.1 Contact person

The Contact Person for this Twinning Light project will be:

Ms. Nataša Kovačević
Head of Department for protection of EU's financial Interests/AFCOS
Ministry of Finance
Stanka Dragojevića 2
81000 Podgorica
Montenegro

The contact person will be responsible for overall coordination on behalf of the Beneficiary administration, facilitation of communication with participating institutions and ensuring availability of relevant staff for project activities.

5.3.2 Project Leader counterpart

The Project Leader counterpart in the Beneficiary administration will be:

Ms. Nataša Kovačević
Head of Department for protection of EU Financial Interests/AFCOS
Ministry of Finance

Beneficiary Project Leader will cooperate closely with the Member State Project Leader in overseeing project implementation, approving work plans, validating deliverables and ensuring institutional ownership of results.

6. Duration of the project

The duration of the Twinning Light project will be eight (8) months from the date of signature of the contract.

This duration is considered sufficient for implementation of the planned analytical work, drafting of strategic and operational documents, organisation of awareness-raising events, delivery of specialised trainings and organisation of one study visit.

All activities and deliverables will be completed within the eight-month implementation period⁴.

7. Sustainability

Sustainability of the project results will be ensured through the formal institutionalisation of developed tools and procedures within the AFCOS system and their integration into existing regulatory and operational frameworks.

⁴ In line with the Twinning Manual provisions, the implementation period of the Twinning Light project may, in justified cases, be extended from eight (8) to a maximum of ten (10) months, subject to approval by the Contracting Authority and the EU Delegation.

The National Anti-Fraud Strategy's Action Plan for the 2027–2028 will be formally adopted by the competent national authorities, ensuring political ownership and continuity beyond the duration of the project.

Particular emphasis will be placed on sustainability of reporting procedures in line with Articles 9, 10 and 11 of the Reform and Growth Facility Agreement, ensuring continued compliance with mandatory reporting obligations, structured cooperation with OLAF and other EU institutions, and maintenance of effective audit trail documentation.

Capacity-building activities will target both AFCOS staff and representatives of IPA structure and AFCOS Network institutions, thereby mitigating risks related to staff turnover and ensuring institutional memory.

Awareness-raising activities will foster a culture of transparency, prevention and zero tolerance for fraud, supporting sustainable protection of the EU financial interests. In this context, the project will develop targeted communication and visibility materials in digital format, notably an e-brochure and an e-flyer. These materials will clearly present the role and mandate of AFCOS, reporting mechanisms for irregularities and suspected fraud, as well as key messages on fraud prevention. The materials will be designed for broad and continuous use, enabling their dissemination through online channels and direct sharing with relevant stakeholders, institutions and the general public. This approach ensures cost-effectiveness, environmental sustainability and long-term usability beyond the project duration.

8. Crosscutting issues

The project will integrate principles of equal opportunities, non-discrimination and balanced participation of women and men in all activities. It contributes to strengthening good governance, transparency and rule of law by reinforcing mechanisms for prevention, detection and reporting of irregularities and fraud in the management of EU funds.

Environmental considerations will be respected. Printed materials will be limited to what is strictly necessary, and electronic dissemination will be prioritised. Events will be organised in a manner that minimises environmental impact.

9. Conditionality and sequencing

No specific conditionality has been identified for the implementation of this Twinning Light project.

10. Indicators for performance measurement

The target audience of this Twinning Light project will include officials from the Ministry of Finance – Department for Protection of EU Financial Interests/AFCOS, members of the IPA structure and AFCOS Network.

Monitoring of project performance will be based on clearly defined indicators linked to each project component and result.

COMPONENT I – Strengthening operational and strategic framework for effective protection of EU financial interests

Result 1: Strengthened operational anti-fraud framework within the AFCOS system

INDICATORS

Sub-Result 1.1: Strategic framework for protection of EU financial interests further strengthened through preparation of the National Anti-Fraud Strategy Action Plan 2027–2028 in line with Government guidelines and OLAF recommendations by IQ 2027.

Sub-Result 1.2: Practical fraud prevention and detection tools for EU-funded projects developed and introduced within the IPA management structure by IQ 2027.

Sub-Result 1.3: Operational procedures for handling irregularities and suspected fraud cases and reporting through the Irregularity Management System (IMS) strengthened within the AFCOS system by IQ 2027.

Sub-Result 1.4: Awareness of the role and mandate of AFCOS in the protection of EU financial interests increased among relevant stakeholders and the wider public by IIQ 2027.

TARGET

- Analysis of the implementation of the current National Anti-Fraud Strategy prepared, including identified gaps and recommendations.
- Action Plan for the National Anti-Fraud Strategy for the period **2027–2028** prepared in line with Government guidelines and OLAF recommendations.
- Fraud Prevention and Detection Checklist for EU-funded projects developed
- Practical Guidance Manual supporting the implementation of the Checklist prepared.
- Methodology for handling irregularities and suspected fraud cases, including reporting through the **IMS system**, prepared within the AFCOS system.
- At least **one validation workshop** organised with representatives of AFCOS, IPA structure and AFCOS Network for presentation and testing of developed tools.
- At least **20 officials** from AFCOS, IPA structure and AFCOS Network participating in the validation workshop.
- At least **3 institutions within the IPA management structure** familiarised with the use of the Fraud Prevention and Detection Checklist and Practical Guidance Manual.
- Improved understanding among relevant institutions regarding procedures for **detection, reporting and follow-up of irregularities and suspected fraud cases**.
- One national awareness-raising public event organised with participation of representatives of AFCOS system institutions, civil society organisations and media (minimum 30 participants).

COMPONENT II – Capacity building of AFCOS system stakeholders through practical anti-fraud training

Result 2: Increased operational capacity of AFCOS system stakeholders, including local self-government, in the prevention, detection and reporting of irregularities and fraud and in cooperation with OLAF

INDICATORS

Sub-Result 2.1: Enhanced practical skills of AFCOS system staff and IPA structure in detecting, classifying and reporting irregularities and fraud by IQ 2027.

Sub-Result 2.2: Strengthened capacities of public officials at central and local self-government level in applying EU anti-fraud requirements and tools in the management of EU-funded projects by IIQ 2027

Sub-Result 2.3: Improved knowledge and practical application of fraud risk assessment and prevention mechanisms by IIQ 2027

Sub-Result 2.4: Capacity of judges and prosecutors to address cases affecting EU financial interests and cooperate with the European Public Prosecutor's Office (EPPO) strengthened by IIQ 2027.

TARGET

- Minimum **one training session** organised for representatives of AFCOS and IPA structure on cooperation with OLAF and handling of administrative investigations, with at least **25 officials trained**.
- **At least 20 officials** from central and local self-government institutions managing EU-funded projects trained on EU anti-fraud requirements and use of anti-fraud tools.
- **At least 20 officials** trained on fraud risk assessment methodologies and preventive measures, including identification of red flags and conflict of interest situations.
- One **study visit organised** for **6–7 officials** to an EU Member State institution responsible for AFCOS coordination or anti-fraud measures.
- Minimum **one specialised training session** organised for judges and prosecutors on protection of EU financial interests and cooperation with the **European Public Prosecutor's Office**, with at least **10 participants trained**.
- At least 70% of participants demonstrate improved knowledge and practical skills through post-training evaluation and case-based exercises.
- Improved cooperation between AFCOS, IPA structure institutions and other bodies involved in the protection of EU financial interests.
- Improved knowledge and exchange of **EU Member States' good practices** regarding anti-fraud measures and protection of EU financial interests.
- Knowledge of participants regarding protection of EU financial interests, cooperation with OLAF and EPPO and reporting of irregularities improved, with at least **20% increase in correct responses in post-training evaluation questionnaires compared to pre-training assessment**.

11. Facilities available

The Beneficiary will provide the Member State experts with the necessary working premises for the implementation of project activities, including appropriate office space, meeting rooms and

logistical support within the premises of the Ministry of Finance (Stanka Dragojevića 2 and Mihaila Lalića 1, 81000 Podgorica, Montenegro).

Where justified by the nature of specific activities (such as larger training sessions, workshops, conferences or public events) or in cases where suitable facilities cannot be made available by the Beneficiary, the project budget may foresee the rental of appropriate premises, in line with the provisions of the Twinning Manual and the principles of sound financial management, proportionality and cost-effectiveness.

The Beneficiary shall ensure that any such rental is duly justified and limited to the duration and scope strictly necessary for the implementation of the relevant activity.

ANNEXES TO PROJECT FICHE⁵

Annex 1. Reference to relevant Government Strategic plans and studies

1. Programme of Accession of Montenegro to the European Union 2024–2027. Reference to Negotiation paper Chapter 32 – Financial Control;
2. Strategy for combating irregularities and fraud for the period 2019-2022 and the accompanying Action Plan;
3. Strategy for Fight Against Fraud and Irregularity Management for Protection of Financial Interests of the European Union 2025 – 2028 and Action plan for 2025-2026.
4. Guidelines on irregularity management with Annexes and appendices.
5. Risk analysis of fraud with a statistical analysis of cases of irregularities in the context of the implementation of projects financed by IPA funds.

Annex 2. List of relevant Laws and Regulations

1. Criminal Code of Montenegro (Official Gazette of the Republic of Montenegro, No. 70/2003, 13/2004, 47/2006; Official Gazette of Montenegro, No. 40/2008, 25/2010, 32/2011, 40/2013, 56/2013, 14/2015, 42/2015, 58/2015, 44/2017, 49/2018, 3/2020 and 121/2025)
2. Law on Management, Internal Control and Internal Audit in the Public Sector (Official Gazette of Montenegro, No. 91/2025)
3. Law on Prevention of Corruption (Official Gazette of Montenegro, No. 53/2014, 42/2017, 73/2019, 111/2022 and 55/2024)
4. Law on Ratification of the Framework Financial and Partnership Agreement between the European Commission and the Government of Montenegro on the arrangements for implementation of Union financial assistance to Montenegro under the Instrument for Pre-Accession Assistance (IPA III) (Official Gazette of Montenegro – International Agreements, No. 8/2022);
5. Decree on the Organization of Indirect Management of the Implementation of European Union Financial Assistance under the Instrument for Pre-Accession Assistance (IPA III) (Official Gazette of Montenegro, No. 108/2023);
6. Law on Ratification of the Framework Agreement between Montenegro represented by the

⁵ <https://www.gov.me/en/article/protection-of-eu-financial-interest>
<https://www.gov.me/en/article/guidelines-on-irregularity-management-with-annexes-and-appendices>

Government of Montenegro and the European Commission on Rules for Implementation of Union Financial Assistance to Montenegro under the Instrument for Pre-Accession Assistance (IPA II), (Official Gazette of Montenegro - International Agreements No. 5/15 .2015.)

7. Decree on organization of the indirect management of the implementation of EU financial assistance under the Instrument for Pre-Accession Assistance (IPA II), (Official Gazette of Montenegro 50/15 of 08.09.2015, 039/16 of 29.06.2016, 033/18 of 14.05.2018)
8. Law on Ratification of the Facility Agreement between the European Union, represented by the European Commission, and Montenegro, represented by the Government of Montenegro, on specific arrangements for implementation of Union support to Montenegro under the Reform and Growth Facility (Official Gazette of Montenegro – International Agreements, No. 2/2025)
9. Reform and Growth Facility for the Western Balkans - Loan Agreement between the European Union represented by the European Commission as Lender and Montenegro as Borrower and the Central Bank of Montenegro as Agent to the Borrower.
10. Decision amending the Decision on Establishing Coordination Body for Monitoring and Managing Policy for Prevention and Suppression of Irregularities for Protection of the European Union Financial Interests (AFCOS network), (Official Gazette of Montenegro No. 06/2015 of 10.02.2015)
11. Decision on Establishing the Coordination Body for Monitoring and Managing the Policy for Prevention and Suppression of Irregularities for the Protection of the European Union Financial Interests (AFCOS Network) (Official Gazette of Montenegro, No. 21/2023, March 2023)
12. Working arrangement on the cooperation between the European Public Prosecutor Officer (EPPO) and the Supreme State Prosecutor's Office of Montenegro

Other relevant documents (available on the internet):

- *Procurement and Grants for European Union external actions -A Practical Guide; 2020*
- *Practical guide for Identifying conflicts of interests in public procurement procedures for structural actions, A practical guide for managers- OLAF, 2015;*
- *Identifying and Reducing Corruption in Public Procurement in the EU, OLAF (Study), 2013*
- *Public Procurement Guidance for Practitioners, DG for Regional and Urban Policy (Guide), 2015*
- *Fraud in Public Procurement “A collection of Red Flags and Best Practices”, OLAF, 2017*
- *Compendium of Anonymised cases, OLAF, 2011*
- *Detection of forged documents in the field of structural actions – A practical guide for managing authorities, European Commission, OLAF, 2013;*
- *Handbook -The role of Member States' auditors in fraud prevention and detection for EU Structural and Investments Funds Experience and practise in the member States, European Commission, OLAF, 2014;*
- *Handbook on “Reporting of irregularities in shared management” OLAF, 2017*

Annex C1b: Simplified Logical Framework

	Description	Indicators (with relevant baseline and target data)	Sources of verification	Risks	Assumptions (external to project)
Overall Objective	Reinforcing Operational and Preventive Anti-Fraud Mechanisms within Montenegro's AFCOS System.	AFCOS system enhanced and operationally adjusted for effective protection of the EU financial interests in line with evolving competences and responsibilities of AFCOS system bodies. Anti-fraud capacities, competences and mutual cooperation of AFCOS, IPA structure and AFCOS Network strengthened.	Final Twinning light Report Documentation produced under the project	Loss of critical competencies or key people in the project Producing results consistent with project specifications	AFCOS System bodies staff trained Anti-fraud capacities, competences and mutual cooperation of AFCOS, IPA structure and AFCOS Network
Specific (Project Objective)	Improved irregularity and fraud management tools, enhanced inter-institutional coordination and structured IMS reporting, ensuring effective internal control, timely reporting of irregularities and cooperation with OLAF.	AFCOS system staff trained and better prepared for prevention, detection and reporting of irregularities and potential fraud cases. Improved operational cooperation between AFCOS, IPA structure institutions and AFCOS Network.	Final Twinning light Report Documentation produced under the project List of participants on trainings	Loss of critical competencies or key people in the project Producing results consistent with project specifications	Anti-fraud capacities, competences and mutual cooperation of AFCOS, IPA structure and AFCOS Network
Mandatory results/outputs by components	<u>COMPONENT I</u> Result 1: Strengthened operational anti-fraud framework within the AFCOS system The following indicative sub-results will be achieved:	Strategic framework for protection of EU financial interests further strengthened through preparation of the National Anti-Fraud Strategy Action Plan 2027–2028 in line with Government guidelines and OLAF recommendations by IQ 2027 .		Loss of critical competencies or key people in the project Producing results consistent with project specifications	Timely and adequate resources for co-financing available Willingness of cooperation within all relevant Ministries and Institutions

	<p><u>Sub-Result 1.1:</u> National Anti-Fraud Strategy's Action Plan 2027–2028 developed in line with Government Guidelines for strategic documents and OLAF recommendations;</p> <p><u>Sub-Result 1.2:</u> Fraud Prevention and Detection Checklist for EU-Funded Projects with Practical Guidance Manual developed;</p> <p><u>Sub-Result 1.3:</u> Developed Methodology for handling irregularity and suspected fraud cases and reporting via IMS, in the context of the Reform and Growth Facility.</p> <p><u>Sub-Result 1.4:</u> Awareness-raising public event organised;</p> <p>COMPONENT II</p> <p>Result 2: Increased operational capacity of AFCOS system stakeholders, including local self-government, in the prevention,</p>	<p>Practical fraud prevention and detection tools for EU-funded projects developed and introduced within the IPA management structure by IQ 2027.</p> <p>Operational procedures for handling irregularities and suspected fraud cases and reporting through the Irregularity Management System (IMS) strengthened within the AFCOS system by IQ 2027.</p> <p>Awareness of the role and mandate of AFCOS in the protection of EU financial interests increased among relevant stakeholders and the wider public by IIQ 2027.</p> <p>Enhanced practical skills of AFCOS system staff and IPA structure in detecting, classifying and reporting</p>		Less participants than it is planned	
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	<p>detection and reporting of irregularities and fraud and in cooperation with OLAF</p> <p>The following indicative sub-results will be achieved:</p> <p><u>Sub-Result 2.1:</u> Enhanced practical skills of AFCOS system staff and IPA structure in detecting, classifying and reporting irregularities and fraud;</p> <p><u>Sub-Result 2.2:</u> Strengthened capacities of public officials at central and local self-government level in applying EU anti-fraud requirements and tools in the management of EU-funded projects</p> <p><u>Sub-Result 2.3:</u> Improved knowledge and practical application of fraud risk assessment and prevention mechanisms</p> <p><u>Sub-Result 2.4:</u> Enhanced capacity of judges and prosecutors in the protection of the EU financial interests and cooperation with EPPO</p>	<p>irregularities and fraud by IQ 2027.</p> <p>Strengthened capacities of public officials at central and local self-government level in applying EU anti-fraud requirements and tools in the management of EU-funded projects by IIQ 2027</p> <p>Improved knowledge and practical application of fraud risk assessment and prevention mechanisms by IIQ 2027</p> <p>Capacity of judges and prosecutors to address cases affecting EU financial interests and cooperate with the European Public Prosecutor's Office (EPPO) strengthened by IIQ 2027.</p>			
Activities	<p>COMPONENT I</p> <p>A.1.1.1. An in-depth analysis of the implementation of the current National Anti-Fraud Strategy will be conducted, including assessment of achieved indicators, identified</p>	<p>Analysis of the implementation of the current National Anti-Fraud Strategy prepared, including identified gaps and recommendations.</p>			

	<p>gaps, and recommendations emerging from previous evaluations. The analysis will include structured consultations with representatives of the AFCOS, AFCOS Network members and IPA structure;</p> <p>A.1.1.2. Based on the analysis, a comprehensive draft Action Plan (2027–2028) will be prepared. The Action Plan will define clearly measurable activities, institutional responsibilities, deadlines and output and outcome indicators in line with Government guidelines for strategic documents and OLAF recommendations;</p> <p>A.1.2.1. A comparative analysis of EU Member State practices in fraud prevention and detection throughout the project lifecycle will be conducted, with a view to identifying best practices and applicable red flag indicators;</p> <p>A.1.2.2. Based on the analysis, a comprehensive Fraud Prevention and Detection Checklist for EU-funded projects will be developed, incorporating red flag indicators and structured control points applicable to procurement procedures, grant award processes, contract implementation, and</p>	<p>Action Plan for the National Anti-Fraud Strategy for the period 2027–2028 prepared in line with Government guidelines and OLAF recommendations.</p> <p>Fraud Prevention and Detection Checklist for EU-funded projects developed.</p> <p>Practical Guidance Manual supporting the implementation of the Checklist prepared.</p> <p>Methodology for handling irregularities and suspected fraud cases, including reporting through the IMS system, prepared.</p> <p>At least one validation workshop organised with representatives of AFCOS, IPA structure and AFCOS Network for presentation and testing of developed tools.</p> <p>At least 20 officials from AFCOS, IPA structure and AFCOS Network participating in the validation workshop.</p> <p>At least 3 institutions within the IPA management structure familiarised with the use of the Fraud Prevention and Detection Checklist and Practical Guidance Manual.</p>			
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	<p>verification of payment claims;</p> <p>A.1.2.3. A Practical Guidance Manual will be prepared as an integral part of the tool, defining verification steps, documentation requirements, risk indicators and control measures to be assessed prior to validating each checklist item;</p> <p>A.1.2.4. The Checklist and the Practical Guidance Manual will be tested through a dedicated practical workshop involving representatives of IPA structure.</p> <p>A.1.3.1. Mapping of existing procedures for detection, preliminary assessment and reporting of irregularities and suspected fraud cases will be conducted, including identification of procedural gaps, bottlenecks and overlaps;</p> <p>A.1.3.2. A detailed Methodology for handling irregularity and suspected fraud cases will be developed, which includes specific provisions on reporting obligations to the European Commission and OLAF in line with the Reform and Growth Facility Agreement and clearly defines roles and responsibilities of the AFCOS,</p>	<p>Improved understanding among relevant institutions regarding procedures for detection, reporting and follow-up of irregularities and suspected fraud cases.</p>			
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	<p>Irregularity Officers, IBFM/IBPMs and other relevant institutions;</p> <p>A.1.3.3. Specific guidance will be included on the structured use of the Irregularity Management System (IMS), documentation standards, timelines, communication channels with EU institutions, and follow-up of reported cases in the context of the Reform and Growth Facility.</p> <p>A.1.4.1. One national public event organised with participation of AFCOS system institutions, civil society organisations and media. The event will focus on the importance of protecting EU financial interests and promoting zero fraud tolerance.</p> <p>COMPONENT II</p> <p>A.2.1.1. A practical training will be delivered focusing on detection, classification and reporting of irregularities and fraud in EU-funded projects. The training will be based on real case scenarios and simulation exercises, covering identification of red flags, classification of irregularities, documentation requirements and reporting through the Irregularity Management</p>	<p>One national awareness-raising public event organised with participation of representatives of AFCOS system institutions, civil society organisations and media (minimum 30 participants).</p>			
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	<p>System (IMS). It will also include elements of financial forensics tailored for non-financial staff, enabling participants to identify anomalies in financial data, detect suspicious transactions and better understand financial evidence in the context of fraud cases.;</p> <p>A.2.1.2. Study visit for 6/7 officials to EU Member State in order to acquire hands on experience of the modus operandi regarding on-the spot controls and anti-fraud measures. The study visit will focus on the practical application of tools and methodologies developed during the Twinning project, such as the Fraud Prevention and Detection Checklist and related guidance, enabling participants to gain hands-on insight into their implementation in an EU Member State context.</p> <p>A.2.2.1. A targeted training will be delivered for public officials involved in the management of EU-funded projects, with particular focus on local self-government units. The training will cover EU anti-fraud requirements, practical identification of irregularities, prevention</p>	<p>Minimum one training session organised for representatives of AFCOS and IPA structure on cooperation with OLAF and handling of administrative investigations, with at least 25 officials trained.</p> <p>At least 20 officials from central and local self-government institutions managing EU-funded projects trained on EU anti-fraud requirements and use of anti-fraud tools.</p> <p>At least 20 officials trained on fraud risk assessment methodologies and preventive measures, including identification of red flags and conflict of interest situations.</p> <p>One study visit organised for 6–7 officials to an EU Member State institution responsible for AFCOS coordination or anti-fraud measures.</p> <p>Minimum one specialised training session organised for judges and prosecutors on protection of EU financial interests and cooperation with the European Public Prosecutor's Office, with at least 10 participants trained.</p> <p>At least 70% of participants demonstrate improved knowledge and practical skills</p>			
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	<p>measures and reporting obligations.</p> <p>A.2.3.1. A specialised training will be delivered on fraud risk assessment and prevention in EU-funded programmes, focusing on practical methodologies for identifying, analysing and mitigating risks;</p> <p>A.2.3.2. The training will cover the use of risk indicators (“red flags”), with specific attention given to prevention and detection of conflict of interest situations, particularly in procurement and project implementation.</p> <p>Sub-Result 2.4: Enhanced capacity of judges and prosecutors in the protection of the EU financial interests and cooperation with EPPO</p> <p>A.2.4.1. A specialised training session will be delivered for judges and prosecutors on the legal framework for the protection of the EU financial interests, including relevant EU legislation, national criminal provisions and obligations arising from the Reform and Growth Facility Agreement;</p> <p>A.2.4.2. The training will address practical aspects of cooperation with the European Public Prosecutor’s Office (EPPO), including referral</p>	<p>through post-training evaluation and case-based exercises.</p> <p>Improved cooperation between AFCOS, IPA structure institutions and other bodies involved in the protection of EU financial interests.</p> <p>Improved knowledge and exchange of EU Member States’ good practices regarding anti-fraud measures and protection of EU financial interests.</p> <p>Knowledge of participants regarding protection of EU financial interests, cooperation with OLAF and EPPO and reporting of irregularities improved, with at least 20% increase in correct responses in post-training evaluation questionnaires compared to pre-training assessment.</p>			
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	<p>mechanisms, exchange of information, interaction between administrative findings and criminal proceedings, and handling of cases involving EU-funded projects;</p> <p>A.2.4.3. A practical case-based session will be incorporated into the training, focusing on hypothetical scenarios involving suspected fraud or other criminal offences affecting EU funds.</p>				
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