**External Whistleblowing Policy and Reporting (Suspected) Fraud Cases Procedure**

*The content of the introductory part of this document is present on the Programme website* [*https://www.interregmeuserhine.eu/en*](https://www.interregmeuserhine.eu/en) *under the specific anti-fraud section in the contact tab where the report form in annexe 1 is also made available.*

The Interreg Meuse-Rhine (NL-BE-DE) Programme is committed to protecting EU and public funds while upholding high legal, ethical, and moral standards. It adheres to the principles of integrity, objectivity, and honesty.

With a zero-tolerance policy towards fraud and corruption, the Programme aims to demonstrate its strong opposition to fraud issues in all aspects of its operations. All individuals involved in the Programme must ensure the full legality of grant funds spent under the Programme. The Programme places a strong emphasis on preventing the illegal acquisition or misuse of these financial resources.

The funds allocated via the Programme must indeed be managed in a transparent, efficient, and compliant manner with the EU legal framework. To ensure the integrity of these funds, a proportionate anti-fraud policy is essential and required following Article 74(1)c) and Annex 11 of the Regulation (EU) Nr. 2021/1060 (CPR).

In the framework of that policy, one of the major tools to detect and deter fraud cases is to set **clear procedures for the reporting of (suspected) fraud cases**. The Programme has therefore established a specific procedure for external whistleblowing.

Anyone who detects suspected or established fraud at any stage of the project lifecycle is encouraged to report the case through the specific template that can be found hereinafter and downloaded on this page. Any (suspected) cases of fraud thus have to be reported when reasonable grounds exist to believe that actions have occurred.

Reports should include clear and factual information about the suspected activity, the individuals or entities involved, and any available supporting evidence.

This policy is designed to align with Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law, ensuring that whistleblowers are protected and their concerns are addressed in a timely and lawful manner. The policy aims to uphold transparency, integrity, and compliance with EU legal and ethical standards, fostering a culture of accountability in the framework of the Programme implementation.

The external report form for suspected or established cases of fraud has to be sent to the following email address: [interregmr.fraud@prvlimburg.nl](mailto:interregmr.fraud@prvlimburg.nl)

The Programme commits to investigating all reports of suspected fraud promptly, impartially, and confidentially. The investigations leading to potential correction of fraud or prosecution are detailed in the Programme anti-fraud policy also available on the Programme website.

**Annexe 1 – External Report Form for Suspected or Established Cases of Fraud**

Through this report, I inform the Programme Interreg VI Meuse-Rhine (NL-BE-DE) 2021-2027 Programme that, based on the provided information and documents, I have become aware of suspected or established case of fraud.

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| **Project and partner concerned by the (suspected) fraud** |
| Project ID number: |
| Project acronym: |
| Name of partner organisation: |

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| **Perimeter of (suspected fraud)** |
| Concerned partner report (if known): |
| Concerned cost categories (if known): |
| Amount of expenditures: |
| Country and place where the (suspected) fraud occurred: |
| Period during which the (suspected) fraud occurred: |

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| **Description and typology of the (suspected) fraud *(Eg. Bribery, collusion, conflict of interests, fake declarations, double funding, etc.).*** |
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| **Elements that led to the suspicion/establishment of fraud**  **Please explain how you were aware of (suspected) fraud case in detail and the reasons/circumstances leading you to suspect the existence of (suspected) fraud case** |
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| **Other Relevant Information as**   * **Potential impact of the fraud within or outside the project** * **Action you have already carried out linked to that (suspected) fraud case** |
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| **Date and signature (only the date is a required field)** | | | |
| Your position  Your name  Address  Telephone number  E-mail address |  | Date  Signature[[1]](#footnote-1) |  |

This report should be sent to the following email address: interregmr.fraud@prvlimburg.nl

To support your suspicion, you may attach copies of documents (if necessary and, if desired, anonymized for you as the reporter) that support your suspicion.

Following Directive (EU) 2019/1937, whistleblowers reporting in good faith are entitled to protection against retaliation, including dismissal, demotion, or any form of harassment. The organisation commits to safeguarding the confidentiality of whistleblowers and ensuring that their identity is disclosed only when necessary and in compliance with legal requirements.

Whistleblowers are encouraged to provide their identity to facilitate investigations; however, anonymous reports are also accepted. It should be noted that the ability to follow up on anonymous reports may be limited.

1. By signing that document, you declare being aware that the Interreg Meuse-Rhine (NL-BE-DE) programme and other authorities may use these facts to undertake further investigations which could lead to appropriate administrative and/or legal actions in relation to suspected unlawful activity. [↑](#footnote-ref-1)