



# ANTI-FRAUD POLICY STATEMENT

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## Preamble

On 8 March 2022 BIKiNNOV - Bike Value Innovation Center - Association was established.

Formally recognised by the National Innovation Agency (ANI), BIKiNNOV is a Centre for Technology and Innovation (CTI) whose purpose is to provide technical and technological support to companies in the two-wheeler sector, promoting the use of technology and innovation as tools to improve business competitiveness, to increase added value and to qualify the supply, particularly small and medium-sized enterprises (SMEs). It is dedicated to the production, dissemination and transmission of business-oriented knowledge and to the creation of economic value, contributing to the pursuit of public policy objectives, orienting its action towards market needs, seeking to fill existing gaps and contributing to the response to societal challenges.

BIKiNNOV's vision is:

*“Being on par with the best that exists worldwide in the scope of soft mobility in terms of research and development, combining and developing the capabilities that already exist in Portugal”.*

Its mission is:

*“To provide the conditions for companies to be able to innovate and develop their products, in soft mobility, in an appropriate manner in terms of research and development, combining the developing, the already existing capacities in Portugal”.*

To fulfil its mission, it seeks to be recognised by its associates, clients and partners as:

**Reliable, Competent, Cooperative and Innovative.**

It is guided by the **following principles**:

- Contribute to the operationalisation of public policies and to European and global strategies, in terms of decarbonisation, circular economy, sustainable mobility and digital transition.

- Promoting an integrated scientific-technological offer of excellence that stimulates the economic evolution of the soft mobility and two wheels sector.
- To act closely with the business sector, stimulating applied research and innovation, promoting the qualification and certification of the business offer.
- To promote the internationalisation of the economy, to enhance external competitive capacity through the improvement of the quality of products, services and processes and their respective certification.
- Stimulating the participation of business associations and companies in stimulating and guiding research and development activities (R&D).
- To contribute to the technical and technological capacity building of companies through highly qualified staff, training and the improvement of management processes.
- To enrich endogenous resources to distinguish, qualify and increase the added value of the national offer of its activity clusters.
- Adopt the best practices of conduct and ethical standards, fundamental and recognised in its area of activity, including social and environmental responsibility, respect for gender equality, the use of public funding in accordance with the principles of economy, efficiency and effectiveness.
- Promote forms of extended cooperation, through participation in associations and networks of national and international ambit, for the creation and dissemination of knowledge.

BIKiNNOV and its employees govern their activities, guided by the following values:

- **Accuracy;**
- **Transparency;**
- **Excellence;**
- **Innovation; and,**
- **Sustainability.**

This Anti-Fraud Policy Statement is part of the implementation of a set of internal procedures and the definition of internal control standards that focus on continuous improvement, the training of human resources and the effective management of public funds, guided by ethical, moral and legal principles.

## Scope of Application

This Anti-Fraud Policy Statement applies, individually and collectively, to all employees of the BIKiNNOV - Bike Value Innovation Center - Association, as well as to all those who directly or indirectly develop activities within it, whether on a permanent or occasional basis.

It is committed to maintaining high standards of legal, ethical and moral conduct and to respect the principles of integrity, objectivity and honesty, in accordance with Community and national law applicable to the management of public funds.

In the exercise of its activity, it pretends to be seen as an active agent in the fight against fraud and corruption, as well as conflict of interests and double financing, leading all employees to share and spread this commitment.

The objective of this policy is to enhance a culture of fraud prevention and detection and to develop procedures that are useful in investigating fraud, corruption and related infractions and specific non-compliance situations, thereby ensuring that such cases are effectively dealt with in an appropriate manner in due course.

The prevention mechanisms aim to reduce the possibility of fraud, based on a solid management and control system, combined with a proactive, structured and targeted fraud risk assessment, and the existence of a comprehensive training and awareness-raising policy to promote a strong ethical culture.

The Resolution of the Council of Ministers No 37/2021 of 6 April, which approved the National Anti-Corruption Strategy 2020-2024, refers to the importance of periodic training to enable the detection and reaction to corruption phenomena, as well as to contribute to the internalisation of the Risk Prevention or Management Plans and the Code of Ethics or Conduct.

BIKiNNOV has already instituted, under the **"Code of Ethics and Conduct"** and the **"Fair Competition Policy"**, procedures for reporting situations of conflict of interest and specific situations of non-compliance or potential fraud.

## 1. Concept Clarification

The term "**fraud**" is commonly used to describe a variety of irregular practices, such as theft, corruption, embezzlement, bribery, falsification and misrepresentation, collusion, money laundering and the concealment of material facts, involving deception predominantly in order to obtain a personal benefit for oneself, a related person or a third party, or to inflict a loss on others. Intent is the essential element to distinguishing fraud from irregularity.

Fraud has a financial impact and causes damage to the reputation of an organisation responsible for the regular, effective and efficient management of funds. This is an issue that is particularly important for BIKiNNOV in that:

- a) Protect the principles of sound financial management of public funds;
- b) Ensure the impartiality of the agents involved in the management and implementation of public resources;
- c) Preserves public trust and the image of the Technology and Innovation Centre in the national and international context.

**Corruption** is the abuse of power for a personal gain.

A **conflict of interest** exists whenever the impartial and objective exercise of a person's official duties is compromised, directly or indirectly, for reasons involving family, emotional life, political or national affinity, economic interest or any other shared interest with, for example, a candidate or beneficiary of European Union funds.

## 2. Responsibilities

As part of its performance as a beneficiary of public funds, BIKiNNOV has defined that the overall responsibility for fraud and corruption risk management has been assigned to an **Audit and Internal Control Team**, which is governed by the following principles:

- Prevention;
- Public interest;
- Impartiality and objectivity;
- Transparency and external scrutiny;
- Promotion of individual responsibility and personal example;
- Strong organisational culture intolerant to possible risk situations.

This team will be aware that managing potential conflicts of interest requires balance, depending on a diversified set of factors:

- Of the organisational culture and awareness at all levels;
- Of the risk levels/areas identified in the Technology and Innovation Centre;
- Defining potential conflict of interest situations;
- Awareness of the circumstances under which conflicts can occur;
- Establishing a robust prevention system;
- Ensure that effective procedures are in place to solve situations of conflict of interest.

**The Audit and Internal Control Team** will have a diversified, multidisciplinary composition, involving various levels of decision and responsibility, ensuring knowledge sharing and risk assessment, taking into consideration the matricial structure of the Technology and Innovation Centre. It consists of:

- 1 Representative of the Fiscal Board;
- Executive Director, with powers delegated by the Board;
- Service Directors;
- Responsible for Human Resources;
- Responsible for Financial Service;
- Quality Service Manager;
- Responsible for the Environment and Sustainability Service;
- 1 Members' Representative.

This team is responsible for:

- Carry out the **Annual Audit Plan** that will be defined by the management, auditing procedures and services by random choice according to the processes handled during the previous year;
- Implement in the field this Anti-Fraud Policy Statement, by building a **Risk Management Manual**, thus ensuring an effective response to fraud cases;
- To ensure the existence of an appropriate system of internal control in the different areas of activity, based on the creation and implementation of a **Management Plan for Risks and Related Infractions**, although BIKiNNOV is exempt from this requirement under the law;
- To carry out a **regular assessment of the fraud risk**, based on the internal procedures that are being implemented, identifying the corrective measures, in a continuous improvement logic, as well as the revision of the Action Plan;
- Ensure staff awareness and **training on fraud**;
- Create **agile mechanisms for internal communication** of alleged fraud, as well as the reporting to the competent investigative bodies, when these occur.

BIKiNNOV provides the various authorities managing the public funds of which it is a beneficiary with adequate information on the procedures followed and the checks carried out in relation to expenditure, which is responsible for recording and storing information on each operation.

It assumes itself as a learning organisation, which immediately passes through its predisposition for innovation, which begins with the management model of the Technology and Innovation Centre itself, based on a matricial approach.



### 3. Fraud Reporting

BIKiNNOV has established in its **Code of Ethics and Conduct**, a Whistleblower Protection Policy, as a legal obligation, given the principle of transparency on which its conduct is based, Law No. 93/2021, of 20 December, which established the General Regime for the Protection of Whistleblowers, transposing into national law Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23 October 2019, on the protection of whistleblowers of violations of European Union law, assuming, consequently, the public commitment to ensure compliance with what is defined below as its whistleblower protection policy.

BIKiNNOV has set up internal and external reporting channels:

- **Email** – [participe@bikinno.pt](mailto:participe@bikinno.pt) where the complaints are addressed to the Board, which delegates to the Executive Director the analysis and processing of the complaint, taking any action deemed appropriate in accordance with the facts exposed.
- **BIKiNNOV Website** – where a channel is made available for the complaint, following the same procedures as mentioned above.
- **Letter** – send the letter to the BIKiNNOV main office, with 'Confidential' marked on the outside of the letter.
- **In Person** – at a meeting requested by the Executive Director or the Board.

The function of these channels is to provide individuals with the means to report possible infractions of European Union law, giving them the status of whistleblowers and, with the recognition of this status, guaranteeing them and third parties identified in their reports adequate protection, materialised in the conditions of security, secrecy, confidentiality of identity or anonymity granted by BIKiNNOV.

All communications will be treated in the strictest confidence and confidentiality, in accordance with the provisions of Law No. 58/2019 of 8 August on the protection of natural persons regarding the processing of personal data and the free movement of such data, referred as the General Data Protection Regulation (GDPR).

## 4. Anti-fraud measures

BIKiNNOV has established anti-fraud measures, based on a rigorous fraud risk assessment, where it focuses on prevention:

- **Sensitization** – *top-down* culture, mandatory continuous training on ethics and integrity, including conflict of interest;
- **Policies, rules and procedures** – definition of a Code of Ethics and Conduct, written rules, clear allocation of functions, sufficient human resources with adequate skills, respecting whenever possible the segregation of functions;
- To establish a **policy of shared responsibility**, where the processes are the knowledge and responsibility of two people, ensuring replacement in case of absence, but also being a mechanism to deter fraudulent and corrupt behaviour.
- **Declarations of Inexistence of Conflict of Interests** - in accordance with the internal procedures involved and risk assessment;
- **Mandatory notification of the accumulation of functions;**
- **Use of external databases for cross-referencing information in the ambit of public contracting procedures** (e.g.: Commercial Registry, EBCR - Central Register of the Effective Beneficiary, elnforma, among others that may be identified at national and/or European level);
- **Evaluation of contractual execution and suppliers;**
- Ensure that your employees are aware of the fraud risks and receive **anti-fraud training;**
- Carrying out **internal audits** to evaluate the procedures implemented;
- **Certification of BIKiNNOV** with ISO/IEC 17025:2017 - Laboratory Management Systems and ISO 9001 - Quality Management Systems, ensuring auditing by external entities.

## Application

Fraud takes many forms and BIKiNNOV will do everything in its power to ensure that none of them occur.

BIKiNNOV maintains an active policy of "zero tolerance" towards fraud and corruption, as well as conflict of interest and double funding, and proposes to implement a rigorous internal control system designed to prevent and detect fraud to the extent possible and, if found, to correct its impact.

This version of the BIKiNNOV Anti-Fraud Policy Statement in the scope of its action as a beneficiary of public funds, and the respective procedures and relevant strategies, were approved at the board meeting on 18th June 2023 and made publicly available on the webpage of the Technology and Innovation Centre, taking effect on the day following its approval.

BIKiNNOV is committed to keeping all corporate bodies and employees aware of their commitments under this Anti-Fraud Policy Statement and will provide appropriate training.

This Anti-Fraud Policy Statement is published in Portuguese and in English.