

# Interreg Baltic Sea Region

## First level control report incl. checklist

Version 2.2 of 22 May 2017

### A. First level control report

The first level control report and checklist constitute an essential and obligatory part of the project's audit trail. They have to be completed by the first level controller of each project partner. Based on these documents the controller can certify the partner's expenditure. The control report including the checklist has to be submitted to the controlled project partner and to the lead partner for validation of the project's overall progress report.

#### 1. Project and partner report

1.1 Project title	Empowering Participatory Budgeting in the Baltic Sea Region		
1.2 Project acronym	EmPaci	1.3 Project No.	#R084
1.4 Partner report no.	3	Final report	<input type="checkbox"/>
1.5 Reporting period	from 01.01.2020	to	30.06.2020

#### 2. Project partner

2.1 Number	15
2.2 Organisation	ITMO University

#### 3. Designated first level controller

3.1 Name	Ms.Svetlana Spesivtseva
3.2 Organisation	LLC «Technologies Investments Construction»
3.3 Job title	Head of audit methodology Department
3.4 Division/unit/department	audit methodology Department
3.5 Address	Malookhtinsky pr., 68, of 402, St. Petersburg, 195112
3.6 Country	Russia
3.7 Telephone	General phone: +7 (812) 401-62-72 Ms.Svetlana Spesivtseva: +7 (921) 910-90-33
3.8 Email	info@audit-tis.ru s_spesivtseva@audit-tis.ru

#### 4. Control information

4.1 Expenditure declared to the controller [EUR]

4.2 Expenditure accepted and certified [EUR]

*If the expenditure declared to the controller is higher than the expenditure accepted and certified, please indicate the expenditure, which was deducted from the partner report, in the section "11. First level control certificate" of the partner report.*

4.3 How much of the partner's expenditure have you checked? ☒ 100% ☐ <100%

*Controllers are expected to check 100% of the expenditure. If less than 100% was checked, the sampling method has to be described.*

4.4 Type of control carried out ☒ desk-based ☐ on-the-spot check ☒ other

4.4.1 Please describe:

place of the project partner < Birzhevaya Linia, 14, office 333, St. Petersburg, 199034 >  
place of audit office < Malookhtinsky pr., 68, of 402, St. Petersburg, 195112 >

4.5 On-the-spot check(s)

*One on-the-spot check is obligatory per project partner in the project lifetime, except when a documented sampling method is applied and allowed by the Programme country. If an on-the-spot check was carried out, please indicate it in the section "11. First level control certificate" of the partner report.*

Date:  Place: ☐ premises of the project partner ☐ place of project outputs ☒ other

Date:  Place: ☐ premises of the project partner ☐ place of project outputs ☒ other

Date:  Place: ☐ premises of the project partner ☐ place of project outputs ☒ other

Date:  Place: ☐ premises of the project partner ☐ place of project outputs ☒ other

Date:  Place: ☐ premises of the project partner ☐ place of project outputs ☒ other

Date:  Place: ☐ premises of the project partner ☐ place of project outputs ☒ other

Date:  Place: ☐ premises of the project partner ☐ place of project outputs ☒ other

Date:  Place: ☐ premises of the project partner ☐ place of project outputs ☒ other

Date:  Place: ☐ premises of the project partner ☐ place of project outputs ☒ other

Date:  Place: ☐ premises of the project partner ☐ place of project outputs ☒ other

Date:  Place: ☐ premises of the project partner ☐ place of project outputs ☒ other

Date:  Place: ☐ premises of the project partner ☐ place of project outputs ☒ other

4.6 Format in which documents were made ☐ original ☒ copies (e.g. certified) ☒ electronic available



#### 4.7 Comments:

### 5. Follow-up measures from previous reports

*If any findings/issues are still open from the previous report(s), describe the follow-up measures recommended by the first level controller and actions implemented by the project partner. Conclude on their effectiveness.*

### 6. Description of findings/observations/reservations

*Specify the findings, observations and reservations, if any, that you made during your checks for this report.*

The amount of deviations identified and corrected in a timely manner during the audit of personnel costs is not material. The increase in staff costs in the reporting period was caused by an increase in incentive payments as part of the salary.

### 7. Conclusions and recommendations


*Describe the measures that were implemented to solve the detected errors. Provide recommendations that help to avoid similar errors. Provide a conclusion whether there is a reliable system in place and whether there is sufficient reassurance that the cost statement is free of material misstatement.*

We found no reason to believe that the current accounting system is unreliable. In our opinion, there is reasonable assurance that this report is free from material misstatement. We recommend strengthening internal control over the timely preparation of reports and supporting information.

### 8. Follow-up measures for the next report

We recommend strengthening internal control over the timely preparation of reports and supporting information.

### 9. Controller's signature

Place	Malookhtinsky pr., 68, of 402, St. Petersburg, 195112
Date	22.09.2020
Name	Ms.Svetlana Spesivtseva
Signature	

**This document cannot be modified in any of its general contents but has to be filled in its specifics linked to the recent first level control. This confirmation has to be filled and signed by the first level controller. In case of non-compliance of this document, the corresponding payment procedure will not be initiated.**



## B. First level control checklist

### 1. Relevant documents

Control question	Yes	No	N/A	
Are the following documents available for the first level control?				
1.1 Subsidy contract	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="text" value="Comment"/>
1.2 Application form/Project data	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="text" value="Comment"/>
1.3 Partnership agreement (signed by project partner)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="text" value="Comment"/>
1.4 Partner report, including list of expenditure (overview of all project expenditure by project partners and budget lines, incl. payment day, VAT specification, procurement procedure for sub-contracted items where applicable, and brief description of the cost item)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="text" value="Comment"/>

### 2. General checks

Control question	Yes	No	N/A	
2.1 As far as evident the partner still has the same legal status as stated in the latest approved application form.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="text" value="Comment"/>
2.2 Does the partner contribution come from the partner's own resources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="text" value="Comment"/>
2.3 Please confirm (answer "yes") that there is no evidence that the expenditure has already been reimbursed by any other funding source (EU, regional, local or other).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text" value="Comment"/>
2.4 Are there mechanisms in place to avoid double-financing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="text" value="Comment"/>
2.5 Was recoverable VAT deducted? <i>If the project partner is not entitled to recover the VAT, please select 'N/A'.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="text" value="Comment"/>
2.6 General comments, recommendations, points to follow-up:				<input type="text" value="Comment"/>

### 3. Accounting and audit trail

Control question	Yes	No	N/A	
3.1 Has one of the following options been chosen to clearly identify the costs allocated to the project? a. A separate accounting system b. An adequate accounting code	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="text" value="Comment"/>
<b>Comments/Follow-up :</b> An adequate accounting code				
3.2 Are the amounts paid accurately recorded in the accounting system? <i>Not applicable for flat rates, standard scales of unit costs or lump sums.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="text" value="Comment"/>
3.3 Are all costs declared only once, i.e. not already reported in this or any of the previous reporting periods?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="text" value="Comment"/>



**Comments/Follow-up :**

This report is a report for the first reporting period.

3.4 Has all expenditure been incurred within the eligible Programme area? ☒ ☐ [Comment](#)

3.5 Has all ERDF expenditure been incurred inside the Union part of the Programme area? ☒ ☐ [Comment](#)

**Comments/Follow-up :**

Those financial sources were not declared for this partner (according to the Application, Russian partners are financed from ENI\_RU)

3.6 Has each reported expenditure been supported by an invoice or an accounting document of equivalent probative value that is complete and accurate in accounting terms? ☒ ☐ [Comment](#)

3.7 Has each expenditure been supported by a payment proof (e.g. bank account statements, bank transfer confirmations, cash receipts)? ☒ ☐ [Comment](#)  
*Not applicable for flat rates, standard scales of unit costs or lump sums.*

3.8 Have the costs been correctly allocated to the budget lines? ☒ ☐ [Comment](#)

3.9 Has the partner's budget by budget lines been respected? ☒ ☐ [Comment](#)

3.10 Is the amount of reported expenditure within the project partner's total budget? ☒ ☐ [Comment](#)

3.11 Is the exchange rate used for the conversion into euros correctly applied, using the monthly exchange rate of the European Commission in the month during which the partner report was submitted to the first level controller? ☒ ☐ ☐ [Comment](#)  
Date when the partner report was submitted to the controller.

3.12 Has the partner received from the lead partner the Programme's co-financing from the previous periods? ☐ ☐ ☒ [Comment](#)

3.13 Does the account, from which the payments are made and received, belong to the partner organisation? In case of deviations (e.g. trustee accounts held by the externalised project management) please confirm that this is a legal set-up. ☒ ☐ ☐ [Comment](#)

3.14 Is it ensured that ineligible costs according to Programme rules and Article 69 (3) (a+b) of Regulation (EU) No 1303/2013 and Art 2 (2) of Delegated Regulation No 481/2014 are excluded? ☒ ☐ [Comment](#)  
In particular:  

- interest on debt
- fines
- financial penalties
- costs related to fluctuation of foreign exchange rate
- gifts that are not related to the promotion communication, publicity and information or that exceed EUR 50
- in-kind contributions (except unpaid voluntary work which is eligible in Interreg Baltic Sea Region).

3.15 As far as evident, were (net) revenues deducted from the total reported eligible costs? <i>If there are no revenues or the activity is implemented under State aid scheme, please tick N/A.</i>	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Comment
3.16 Is there evidence that reported activities have taken place and that co-financed products and services were delivered or are in the process to being delivered? <i>If the evidence was not obtained through an on-the-spot check, it is important to indicate in the comment section how sufficient assurance was gained instead.</i>	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Comment
3.17 Are all costs directly related to the project and necessary for the development or implementation of the project?	<input checked="" type="checkbox"/> <input type="checkbox"/>	Comment
3.18 General comments, recommendations, points to follow-up:		Comment

#### 4. Budget lines

##### Budget line 1 - Staff costs

If costs under this budget line are included in the report please tick here ☒

Control question	Yes	No	N/A	
4.1 Is the expenditure related only to staff/employees directly employed by the organisation which is officially listed as a project partner in the application form or natural persons that work under a contract considered as an employment contract according to the national law?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Comment
4.2 Was the compulsory "Staff cost tool" used for calculation of the staff costs of every employee working for the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Comment
4.3 Is the "Staff cost tool" completed with the correct data and in a correct way?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Comment

##### Comments/Follow-up :

Timesheets were not submitted to the FLC in a timely manner due to late completion of work.

4.4 The staff costs are calculated according in the following way:		Comment
1. Person employed by the partner organisation working <b>full-time</b> on the project	<input checked="" type="checkbox"/> <input type="checkbox"/>	
2. Person employed by the partner organisation working <b>partly</b> on the project at a <b>fixed percentage</b>	<input type="checkbox"/> <input checked="" type="checkbox"/>	
3. Person employed by the partner organisation working <b>partly</b> on the project at a <b>flexible percentage</b> (flexible number of hours per month)		
a. Calculation based on the monthly contractual hours as indicated in the employment contract	<input checked="" type="checkbox"/> <input type="checkbox"/>	
b. Calculation based on dividing the latest documented annual gross employment costs (= gross employment costs for 12 consecutive months before the person started the work for the project resp. before the start of the relevant reporting period) by 1,720 hours.	<input type="checkbox"/> <input checked="" type="checkbox"/>	
4. Person employed by the partner organisation based on a contracted hourly rate.	<input type="checkbox"/> <input checked="" type="checkbox"/>	



**Comments/Follow-up :**

4.5 Where relevant, the following documents are available:

☒ ☐ ☐ **Comment**

- work contract or equivalent
- job description or equivalent
- payslips (or similar)
- payment proofs
- time sheet (relevant for the calculation option 3 and 4 in the question 4.4)

**Comments/Follow-up :**

We recommend that you fill out your timesheets in a timely manner.

4.6 Provided a person works in several projects, please confirm that there is no evidence that the total number of working hours declared exceeds the total eligible working time of the employee (no double-financing).

☒ ☐ ☐ **Comment**

4.7 General comments, recommendations, points to follow-up:

**Comment**

**Comments/Follow-up :**

We recommend that you fill out your timesheets in a timely manner.

**Budget line 2 - Office and administrative expenditure**

**Control question**

Yes No N/A

4.8 Is it ensured that no office and administration costs (such as stationery, photocopying, mailing, telephone, fax and internet, heating, electricity, office furniture, maintenance, office rent) are declared under any other budget line?

☒ ☐ **Comment**

4.9 General comments, recommendations, points to follow-up:

**Comment**

**Budget line 3 - Travel and accommodation costs**

If costs under this budget line are included in the report please tick here ☐

**Budget line 4 - External expertise and service costs**

If costs under this budget line are included in the report please tick here ☒

**Control question**

Yes No N/A

4.15 Are the deliverables available, identifiable and in compliance with the contract/agreement concluded between the project partner and the service provider and in compliance with invoices/requests for reimbursement?

☒ ☐ **Comment**

*As for all other expenditure items, check that the external expertise and services were contracted in compliance with public procurement rules.*

4.16 Is the expenditure related to items foreseen under this budget line in the specifications provided in the application form/project data?

☒ ☐ **Comment**

4.17 As far as evident, are the providers of services or expertise different from the project partner organisations and their employees?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Comment
4.18 Have the travel and accommodation expenses of external service providers or guests invited by the project partners also been recorded under the external services and experts budget line (i.e. not under the travel and accommodation budget line)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Comment
4.19 General comments, recommendations, points to follow-up:				Comment

**Budget line 5 – Equipment expenditure**

If costs under this budget line are included in the report please tick here ☐

**Budget line 6 – Infrastructure and works**

If costs under this budget line are included in the report please tick here ☐

**Budget line 7 – Expenditure for specific project activities**

If costs under this budget line are included in the report please tick here ☐

**5. Public Procurement**

	Control question	Yes	No	N/A	
5.1	Has the controlled organisation observed European, Programme, national, regional and internal public procurement rules?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Comment
	<p><i>For cases above EUR 5,000, please indicate in the comments section:</i></p> <ul style="list-style-type: none"> <li>• The relevant threshold</li> <li>• The procedure (open, restricted, negotiated, direct contracting, bid-at-three rule etc.)</li> <li>• Degree of publicity/media applying to this threshold</li> <li>• Title of contracts/name of contractor falling under this threshold</li> <li>• A conclusion about the adequacy of the procedure</li> </ul> <p><i>Pay particular attention to contracts awarded below the EU-threshold and especially to contracts that are awarded directly.</i></p>				
5.2	Have the principles of transparency, non-discrimination, equal treatment and effective competition been respected, including for items below the EU threshold?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Comment
	<p><i>Transparency rules are outlined in the Commission Interpretative Communication on the Community law applicable to contract awards not or not fully subject to the provisions of the public procurement directives (2006/C179/02).</i></p>				
<p><b>Comments/Follow-up :</b></p> <div style="border: 1px solid black; height: 30px; width: 100%;"></div>					



<p><b>5.3 Is full documentation of the procurement procedure available?</b></p> <p>It usually includes the following:</p> <ul style="list-style-type: none"> <li><i>Initial cost estimate made by the project partner to identify the applicable public procurement procedure</i></li> <li><i>Request for offers or procurement publication / notice</i></li> <li><i>Terms of reference</i></li> <li><i>Offers/quotes received</i></li> <li><i>Report on assessment of bids (evaluation/selection report)</i></li> <li><i>Information on acceptance and rejection (notification of bidders)</i></li> <li><i>Contract including any amendments</i></li> </ul> <p><i>In case documentation is not required, please tick N/A and provide an explanation in the comments section.</i></p> <p><b>Comments/Follow-up :</b></p> <div style="border: 1px solid black; height: 30px; width: 100%;"></div>	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <span style="border: 1px solid black; padding: 2px;">Comment</span>
<p><b>5.4 In case it is relevant, were the contracts advertised in the Official Journal of the European Union?</b></p> <p><b>Among others, please check following:</b></p>	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <span style="border: 1px solid black; padding: 2px;">Comment</span>
<p><b>5.5 Are the contracts in line with the selected offers?</b></p>	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <span style="border: 1px solid black; padding: 2px;">Comment</span>
<p><b>5.6 Please confirm (answer "yes") that there has been no artificial splitting of the contract objective/value in order to avoid public procurement requirements.</b></p>	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <span style="border: 1px solid black; padding: 2px;">Comment</span>
<p><b>5.7 Has any contract been amended or extended?</b></p> <p><b>Comments/Follow-up :</b></p> <div style="border: 1px solid black; height: 30px; width: 100%;"></div>	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <span style="border: 1px solid black; padding: 2px;">Comment</span>
<p><b>5.8 For tenders: Were the evaluation and award decisions properly documented and justified (e.g. evaluation and award decisions are properly documented and selection and award criteria have been applied to all received offers in a consistent way and as published in advance and no new criteria were added)?</b></p> <p><b>Comments/Follow-up :</b></p> <div style="border: 1px solid black; padding: 5px;"> <p>In the last reporting period, a single contract was concluded for an amount exceeding the requirements of national regulations, but below the European ones. Expenses are included in expenses for the reporting period (audit expenses). The evaluation and award decisions are properly documented, and the selection and award criteria were applied to all received proposals in an agreed manner and were published in advance, and no new criteria were added.</p> </div>	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <span style="border: 1px solid black; padding: 2px;">Comment</span>
<p><b>5.9 For direct awards because of</b></p> <ul style="list-style-type: none"> <li><i>Urgency: is it proven that the urgency is due to unforeseeable circumstances?</i></li> <li><i>Technical/exclusivity reasons: is it ruled out (based on objective evidence) that any other supplier is capable of providing the services?</i></li> </ul>	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <span style="border: 1px solid black; padding: 2px;">Comment</span>
<p><b>5.10 Have invoices been issued and payments been done in line with the procurement budget and the amounts fixed in the contract/the accepted offer (global price, unit prices)?</b></p>	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <span style="border: 1px solid black; padding: 2px;">Comment</span>

#### 5.11 Bid-at-three rule

☐ ☐ ☒ **Comment**

Do the purchases of equipment, investment or external services below the national threshold and above EUR 5,000.00 (without VAT) comply with the Programme's bid-at-three rule? In that respect please see the note about non-discrimination and equal treatment.

*Please note: According to the jurisdiction of the European Court of Justice, the contracting authorities have to comply with the principles of non-discrimination and equal treatment laid down in the EC treaty, even below the EC thresholds. Based on these requests the European Court of Justice states an obligation of transparency and requests the contracting authority to ensure "a degree of advertising sufficient to enable the services market to be opened up to competition".*

#### Comments/Follow-up :

Purchases of equipment, investments or external services below the national threshold and above 5 000,00 euros (excluding VAT) were not made in the reporting period.

#### 5.12 General comments, recommendations, points to follow-up:

**Comment**

#### Comments/Follow-up :

### 6. Information and publicity rules

	Control question	Yes	No	N/A	
6.1	Please confirm the compliance with the following: When a project partner (i.e. institution, organisation) or a project maintains a website, this website should include a short description of the project, proportionate to the level of support, including its aims and results, and highlighting the financial support from the Programme/European Union. It shall also adhere to 6.3.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<b>Comment</b>
6.2	Has the partner organisation placed at least one poster with information about the project (minimum size A3) at a location readily visible to the public? The poster shall adhere with 6.3. and display the objective of the project as well as the amount of EU financial support.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<b>Comment</b>
6.3	Please confirm that where relevant the project information and communication measures have displayed the support from the Programme and the EU funds as follows:				
	a) the European Union emblem in accordance with the technical characteristics specified in the European Commission Implementation Regulation(EU) 821/2014, together with a reference to the European Union;	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<b>Comment</b>
	b) a reference to the EU funding source(s). The reference shall read as follows: European Union (European Regional Development Fund) in English or respective national language; and	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
	c) the Programme logo	<input checked="" type="checkbox"/>	<input type="checkbox"/>		



6.4 Please confirm that every equipment item that is a **part of a project's investment(s)** and which is partially or fully financed by the Programme has been marked with a label containing the following elements:

- the European Union emblem;
- a reference to the EU funding source(s); and
- the Programme logo.

The label must not be removed even after the finalisation of the project.

*If there was no investment(s) planned in the application form, please select "N/A".*

☐ ☐ ☒

## 7. Compliance with State aid rules

*First level controllers are asked for a professional judgment as a controller here. They are asked in particular to confirm that they have not come across anything that makes them doubt that the EU and/or Programme State aid rules are not adhered to. It is important to indicate what the professional judgment is based on, such as reported activities compared to the application form, project partner confirmations obtained on these matters, insights gained during an on-the-spot check, interviews with the project partner or other internal documents that a project partner provides.*

Control question		Yes	No	N/A	
7.1	Are the State aid relevant activities in line with the latest approved version of the application and do not raise any new issues?  <i>Each group of activities in the application that contains State aid relevant activities is marked as "State aid relevant" through a checkbox.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="text" value="Comment"/>
7.2	Has all expenditure for State aid relevant activities been correctly declared as State aid relevant in the project partner's accounting system and report?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="text" value="Comment"/>
7.3	Is the State aid budget of the project partner observed?  <i>The budget flexibility does not automatically apply to the State aid budget. In case a partner uses the budget flexibility it has to prove that this has been agreed on with the lead partner and the MA/JS.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="text" value="Comment"/>
7.4	Please confirm that only Interreg Baltic Sea Region supports the eligible costs with State aid. <i>State aid granted for the same eligible costs cannot be accumulated, i.e. a project partner cannot receive State aid for the same eligible costs from this Programme and from any other public funding source.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="text" value="Comment"/>
7.5	For project partners framed within the General Block Exemption Regulation (GBER): a. Are the specific conditions as laid down in the GBER declaration complied with? b. Did the project activities start only after the application form of the 2nd step was submitted to the Programme?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="text" value="Comment"/>

7.6 In case there are activities of the project partner that are not marked as "State aid relevant" in section 4 of the application: Are these activities of non-economic nature? ☐ ☐ ☒

*In this context, non-economic means:*

- The project partner does not undertake any activities for which a market exists; or
- The project partner does not offer goods/ services for which a market exists; or
- The project partner does not implement activities in the context of the project that could be carried out by a private operator which intends to make profit (even if it is not the intention within the project); or
- The project partner does not provide goods/services in the context of the project that could be provided by a private operator which intends to make profit (even if it is not the intention within the project); or
- The project partner does not construct infrastructure (e.g. port infrastructure) that shall be exploited economically and is not available for public use free of charge.

7.7 General comments, recommendations, points to follow-up:

## 8. Anti-fraud measures

First level controllers are asked for a professional judgment as a controller here. They are asked in particular to confirm that they have not come across anything that makes them doubt that the EU and/or Programme rules are not adhered to. It is important to indicate what the professional judgment is based on.

The column "N/A" does only apply if there is no expenditure declared in the budget line concerned.

Control question		Yes	No	N/A	
8.1	During the check of BL1 Staff costs, did you come across any evidence of fraud? (for guidance please see the Annex 1 below)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="button" value="Comment"/>
8.2	During the check of expenditure of BL4 External expertise and services, including the public procurement procedures, did you come across any evidence of fraud? (for guidance please see the Annex 1 below)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="button" value="Comment"/>
8.3	During the check of BL5 Equipment, did you come across any evidence of fraud? (for guidance please see the Annex 1 below)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="button" value="Comment"/>
8.4	During the check of BL6 Infrastructure and works, did you come across any evidence of fraud? (for guidance please see the Annex 1 below)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="button" value="Comment"/>
8.5	During the check of the project, did you come across any other evidence of fraud? Or do you have any general comments, recommendations or points to follow-up?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="button" value="Comment"/>
8.6	Please indicate what your professional judgment is based on, such as:				
	• project partner confirmations obtained on these matters	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="button" value="Comment"/>
	• insights gained during an on-the-spot check	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="button" value="Comment"/>
	• interviews with the project partner	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="button" value="Comment"/>



- further internal documents provided by the project partner

☒
☐
☐
 Comment

**Comments/Follow-up :**

Internal regulations, orders, and service notes were submitted for review.

- other

☐
☐
☒
 Comment

8.7 Please tick if any suspected or established fraud was detected (for any point from 8.1 to 8.5 that was ticked "Yes") and in such case please fill in Annex 2 below.

☐

**9. Controller's signature**

Place Malookhtinsky pr., 68, of 402, St. Petersburg, 195112

Date 22.09.2020

Name Ms.Svetlana Spesivtseva

Signature 

Validate & print

**This document cannot be modified in any of its general contents but has to be filled in its specifics linked to the recent first level control. This confirmation has to be filled and signed by the first level controller. In case of non-compliance of this document, the corresponding payment procedure will not be initiated.**