

Anti-fraud and Financial Transparency Policy 01/2026

Introduction

As an organisation that participates in publicly funded projects, Learnmera Oy recognises the importance of strict financial integrity and transparency.

1. Purpose

This policy aims to:

- Prevent, detect and respond to fraud and financial irregularities
- Ensure that all resources are used for their intended purpose
- Provide confidence to funders, partners and auditors

2. Scope

Applies to:

- All employees, freelancers and consultants involved in financial management
- All EU-funded and nationally funded projects implemented by Learnmera

3. Definitions

For the purposes of this policy, fraud includes (but is not limited to):

- Falsifying timesheets, invoices or financial records
- Misuse of project funds for non-project purposes
- Double funding of the same cost from different sources
- Kickbacks or unauthorised commissions

4. Principles

- All financial transactions must be documented, traceable and justifiable.
- Project budgets and cost eligibility rules will be clearly communicated to all involved staff.
- The “four-eyes principle” (at least two people checking) will be applied where possible for approvals of significant payments.

5. Procedures

- Supporting documents (invoices, contracts, timesheets, travel tickets, attendance lists) will be collected and stored in an organised way.
- Regular internal checks will be carried out on project accounts.
- Any suspected irregularities must be reported immediately to management.

6. Cooperation with auditors and funders

- Learnmera will fully cooperate with audits and checks by national agencies, the European Commission or other competent bodies.
- Information requested by auditors will be provided accurately and within deadlines.

7. Response to suspected fraud

- Management will investigate any credible allegation of fraud or financial irregularity.
- If confirmed, corrective measures will be taken, which may include recovery of funds, notification of funders and, in serious cases, legal action.

8. Monitoring and review

This policy is reviewed regularly, especially when new funding instruments or rules are introduced.