

# SAFE—IN

## Strengthening Actions against Fraud: Empowering whistleblowing directive compliance

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Deliverable 5.2

## MoU and/or cooperation agreements

Grant agreement no° 101140591

Project - SAFE-IN

Submission date

2024-03-19

Responsible author(s)

ANCI LOMBARDIA



## 1. Summary of the deliverable

The “SAFE-IN: Strengthening Actions against Fraud: Empowering whistleblowINg directive compliance” Project, promoted by ANCI Lombardia as part of the EU Anti-Fraud Programme, aims to strengthen anti-fraud measures by promoting a proper understanding and application of whistleblowing regulations. This is set within a context that integrates this regulation with other compliance tools already operational in the Italian system, including:

- Legislative Decree 231/01 (administrative liability of entities);
- Law 190/12 and the National Anti-Corruption Plan (PNA) of ANAC;
- Legislative Decree 231/07 (prevention of money laundering and terrorism financing), etc. With the activities planned by the project,

As part of the project’s efforts to ensure sustainability and maximize its reach, WP5 has placed a strong emphasis on creating synergies with other relevant initiatives and fostering a network of collaborations. To formalize these connections and reinforce long-term cooperation, several Memoranda of Understanding (MoUs) have been signed with key partners. This strategic decision aims to establish stable and lasting relationships with organizations that share common goals, ensuring greater visibility for the project’s outcomes and facilitating the adoption of its solutions. By clearly defining mutual commitments, roles, and responsibilities, the MoUs provide a structured framework for cooperation, enabling an effective exchange of knowledge and resources while aligning efforts toward shared objectives.

## 2. Description of the Deliverable

**Deliverable 5.2** foresees the signature of at least **two Memoranda of Understanding (MoUs)** with similar initiatives to ensure the project's sustainability and maximize its reach. In the **Safe-IN Project**, **four MoUs** have been signed with: **Confservizi Lombardia**, the **Metropolitan City of Milan**, **Transparency International Italy**, and **AB Corporation**. These agreements, each with a duration of 12 months, reflect a joint commitment to promoting whistleblowing policies and raising awareness about the importance of reporting misconduct.

- **Confservizi Lombardia** is the association representing local public service companies in the Lombardy region, with a strong focus on sectors like energy, water, transportation, and waste management. In this collaboration, Confservizi Lombardia plays a key role in supporting the implementation of transparency and anti-corruption measures in public services, offering guidance to local businesses and municipalities.
- The **Metropolitan City of Milan** is a territorial government body that coordinates governance efforts across the metropolitan area. It supports the project by promoting the adoption of anti-corruption and transparency plans among local municipalities and public institutions, and by facilitating training and awareness programs to foster a culture of integrity and legality.
- **Transparency International Italy** is the Italian branch of Transparency International, a global non-governmental organization dedicated to combating corruption and promoting transparency in both the public and private sectors. It brings its extensive expertise in advocating for anti-corruption policies, raising public awareness, and providing training on whistleblowing and legal compliance in Italy and Europe.
- **AB Corporation** is a leading consultancy and solutions provider with a strong focus on sustainability, digital transformation, and corporate social responsibility. AB Corporation's involvement in the project focuses on supporting the development and implementation of ethical governance frameworks and sustainability practices. Through its innovative approach, AB Corporation assists in driving the adoption of transparency measures in both public and private organizations.

The collaboration focuses on supporting the implementation of whistleblowing mechanisms at both the national and European levels, engaging local governments, businesses, and civil society in the process. To achieve these goals, the parties have agreed to take concrete actions, such as organizing events, seminars, and training sessions dedicated to whistleblowing and anti-corruption practices. These initiatives will aim to build a strong culture of integrity, highlighting the importance of ethical conduct in both public and private sectors.

Additionally, the partners will actively participate in relevant initiatives and share best practices to strengthen institutional networks and cooperation. Another key aspect of the collaboration is the dissemination of information through institutional channels, ensuring that municipalities and publicly controlled companies can benefit from access to educational materials, guidelines, and case studies.

Beyond raising awareness, the MoUs also establish a framework for continuous knowledge exchange. Regular meetings will be held to assess progress, share insights, and plan future initiatives, ensuring that the collaboration remains dynamic and results-oriented. By fostering a structured and cooperative approach over the course of 12 months, these partnerships will contribute to a broader cultural shift toward transparency, integrity, and accountability in both public and private sectors.

This approach aligns with the broader goals of the project, ensuring that the impact of the initiative extends beyond initial activities and creates lasting effects within the participating institutions and communities.

## Memorandum of Understanding: Key Objectives and Implementation

The partners recognize the critical importance of transparency, integrity, and the fight against corruption within public institutions. They share a common commitment to raising awareness, educating stakeholders, and promoting a deeper understanding of whistleblowing legislation and its application across local governments, public entities, and private companies. Through this collaboration, they aim to develop synergies that facilitate the exchange of best practices, knowledge, resources, and tools to strengthen whistleblowing policies at the European level.

### Commitments of the Parties

By signing this Memorandum of Understanding (MoU), the parties agree to:

- Promote whistleblowing frameworks and related legislation at the European level, increasing awareness among local governments, citizens, and public and private organizations about the importance of reporting misconduct.
- Identify and develop complementary initiatives and programs that support the implementation of whistleblowing policies in both local governments and businesses at national and European levels.

### Implementation Approach

To achieve these goals, the parties will engage in the following activities:

- Organizing and participating in events, seminars, workshops, conferences, and training sessions to enhance awareness of whistleblowing practices.
- Promoting whistleblowing legislation through institutional channels and among their respective networks.
- Supporting the dissemination of informational materials and best practices to Italian municipalities and publicly controlled companies.
- Organizing targeted training sessions for Italian local administrations and public entities.
- Sharing relevant reports, studies, data, and educational resources to foster knowledge exchange.
- Conducting regular meetings to assess progress, refine strategies, and plan future initiatives.

### Duration and Implementation Framework

- This MoU will remain in effect for 12 months from the date of signing, with the possibility of renewal upon mutual agreement.
  - Activities will be coordinated and executed through periodic meetings.
  - While this MoU is not legally binding, it represents a shared commitment to collaborate in achieving common objectives and fostering a culture of transparency and accountability.
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### 3. Annexes

#### Subscription Photos of the Memorandum of Understandings



# Memorandum of Understanding between ANCI Lombardia and Confservizi Lombardia



SAFE—IN  
Strengthening Actions against Fraud:  
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IT91S0623001600000057340242  
CUP B83C24000350005

## MEMORANDUM OF UNDERSTANDING (MoU)

### BETWEEN

**The National Association of Italian Municipalities Lombardy (ANCI Lombardia)**

### AND

**Confservizi Lombardia**

### GIVEN THAT

- ANCI Lombardia and Confservizi Lombardia recognize the importance of transparency, integrity, and the fight against corruption within public institutions;
- The parties agree on the value of raising awareness, educating, and promoting understanding of whistleblowing legislation and its applications in local governments, public entities, and private companies;
- Promoting the whistleblowing model is essential to enhance the effectiveness and efficiency of control systems, fostering a more ethical and accountable work environment;
- ANCI Lombardia and Confservizi Lombardia aim to develop synergies and collaborations that facilitate the sharing of best practices, knowledge, resources, and tools for improving whistleblowing policies at the European level;

### TERMS OF AGREEMENT:

#### 1. Objectives of the Collaboration

The parties commit to:

- Promoting the whistleblowing model and related legislation at the European level, to raise awareness among local governments, citizens, and other public and private organizations about the importance of reporting misconduct;
- Identifying and developing parallel initiatives and programs that support the adoption of whistleblowing policies in local governments and businesses at both national and European levels;
- Creating and strengthening networks among national and international authorities to share experiences, knowledge, and best practices in the field of whistleblowing and anti-corruption

This will be achieved through:



safein.anci.lombardia.it  
europa@anci.lombardia.it

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Via Rovello, 2 - 20121 Milano  
Telefono +39 02 7262 9601



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- Organizing events, seminars, workshops, conferences, and training courses to raise awareness about whistleblowing;
- Participating in events, seminars, initiatives, and specialized courses on whistleblowing.

### 3. Commitments of the Parties

- **The parties agree to:**
  - Promote whistleblowing legislation through their institutional channels and among their members;
  - Support the dissemination of informational materials and best practices among Italian municipalities and publicly controlled companies;
  - Organize specific training events for Italian local administrations and public entities.

### 4. Knowledge Sharing and Best Practices

The parties will ensure the exchange of knowledge and best practices through:

- Sharing relevant reports, studies, data, and educational materials;
- Organizing regular meetings to discuss progress and plan future activities.

### 5. Duration and Implementation Modalities

This MoU will be valid for 12 months from the date of signing, with the possibility of renewal by mutual agreement between the parties.

Activities will be planned and implemented through periodic meetings.

### 6. Management and Coordination

The parties will appoint a coordinator responsible for managing and overseeing the activities outlined in this MoU. The coordinator will act as the main point of contact for all matters related to the implementation and monitoring of activities.

### 7. Confidentiality



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The parties agree to treat all exchanged information and sensitive data with confidentiality, in compliance with applicable data protection laws.

#### 8. Final Provisions

- This MoU does not constitute a legally binding agreement but represents a mutual commitment to collaborate toward achieving common objectives.
- Any amendments or additions to this MoU must be agreed upon in writing by both parties.
- In the event of disputes regarding the interpretation or implementation of this MoU, the parties commit to resolving them amicably through dialogue and mediation.

Executed in Milan, on January 27.

For ANCI Lombardia:

Rinaldo Mario Redaelli - General Secretary

For Confservizi Lombardia:

Yuri Santagostino - President



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# Memorandum of Understanding between ANCI Lombardia and Metropolitan City of Milan



SAFE—IN  
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## MEMORANDUM OF UNDERSTANDING (MoU)

### BETWEEN

**The National Association of Italian Municipalities Lombardy (ANCI Lombardia)**

### AND

**Metropolitan City of Milan**

### GIVEN THAT

- ANCI Lombardia and Metropolitan City of Milan recognize the importance of transparency, integrity, and the fight against corruption within public institutions;
- The parties agree on the value of raising awareness, educating, and promoting understanding of whistleblowing legislation and its applications in local governments, public entities, and private companies;
- Promoting the whistleblowing model is essential to enhance the effectiveness and efficiency of control systems, fostering a more ethical and accountable work environment;
- ANCI Lombardia and Metropolitan City of Milan aim to develop synergies and collaborations that facilitate the sharing of best practices, knowledge, resources, and tools for improving whistleblowing policies at the European level;

### TERMS OF AGREEMENT:

#### 1. Objectives of the Collaboration

The parties commit to:

- Promoting the whistleblowing model and related legislation at the European level, to raise awareness among local governments, citizens, and other public and private organizations about the importance of reporting misconduct;
- Identifying and developing parallel initiatives and programs that support the adoption of whistleblowing policies in local governments and businesses at both national and European levels;
- Creating and strengthening networks among national and international authorities to share experiences, knowledge, and best practices in the field of whistleblowing and anti-corruption

This will be achieved through:



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- Organizing events, seminars, workshops, conferences, and training courses to raise awareness about whistleblowing;
- Participating in events, seminars, initiatives, and specialized courses on whistleblowing.

### 3. Commitments of the Parties

- The parties agree to:
  - Promote whistleblowing legislation through their institutional channels and among their members;
  - Support the dissemination of informational materials and best practices among Italian municipalities and publicly controlled companies;
  - Organize specific training events for Italian local administrations and public entities.

### 4. Knowledge Sharing and Best Practices

The parties will ensure the exchange of knowledge and best practices through:

- Sharing relevant reports, studies, data, and educational materials;
- Organizing regular meetings to discuss progress and plan future activities.

### 5. Duration and Implementation Modalities

This MoU will be valid for 12 months from the date of signing, with the possibility of renewal by mutual agreement between the parties.

Activities will be planned and implemented through periodic meetings.

### 6. Management and Coordination

The parties will appoint a coordinator responsible for managing and overseeing the activities outlined in this MoU. The coordinator will act as the main point of contact for all matters related to the implementation and monitoring of activities.

### 7. Confidentiality



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The parties agree to treat all exchanged information and sensitive data with confidentiality, in compliance with applicable data protection laws.

#### 8. Final Provisions

- This MoU does not constitute a legally binding agreement but represents a mutual commitment to collaborate toward achieving common objectives.
- Any amendments or additions to this MoU must be agreed upon in writing by both parties.
- In the event of disputes regarding the interpretation or implementation of this MoU, the parties commit to resolving them amicably through dialogue and mediation.

Executed in Milan, on January 27.

For ANCI Lombardia:

Rinaldo Mario Redaelli – General Secretary

For Metropolitan City of Milan:

Antonio Sebastiano Purcaro – General Secretary



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# Memorandum of Understanding between ANCI Lombardia and Transparency International Italy



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## MEMORANDUM OF UNDERSTANDING (MoU)

BETWEEN

**The National Association of Italian Municipalities Lombardy (ANCI Lombardia)**

AND

**Trasparenza international Italy**

GIVEN THAT

- ANCI Lombardia and Trasparenza international Italy recognize the importance of transparency, integrity, and the fight against corruption within public institutions;
- The parties agree on the value of raising awareness, educating, and promoting understanding of whistleblowing legislation and its applications in local governments, public entities, and private companies;
- Promoting the whistleblowing model is essential to enhance the effectiveness and efficiency of control systems, fostering a more ethical and accountable work environment;
- ANCI Lombardia and Trasparenza international Italy aim to develop synergies and collaborations that facilitate the sharing of best practices, knowledge, resources, and tools for improving whistleblowing policies at the European level;

### TERMS OF AGREEMENT:

#### 1. Objectives of the Collaboration

The parties commit to:

- Promoting the whistleblowing model and related legislation at the European level, to raise awareness among local governments, citizens, and other public and private organizations about the importance of reporting misconduct;
- Identifying and developing parallel initiatives and programs that support the adoption of whistleblowing policies in local governments and businesses at both national and European levels;
- Creating and strengthening networks among national and international authorities to share experiences, knowledge, and best practices in the field of whistleblowing and anti-corruption

This will be achieved through:



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- Organizing events, seminars, workshops, conferences, and training courses to raise awareness about whistleblowing;
- Participating in events, seminars, initiatives, and specialized courses on whistleblowing.

### 3. Commitments of the Parties

- **The parties agree to:**
  - Promote whistleblowing legislation through their institutional channels and among their members;
  - Support the dissemination of informational materials and best practices among Italian municipalities and publicly controlled companies;
  - Organize specific training events for Italian local administrations and public entities.

### 4. Knowledge Sharing and Best Practices

The parties will ensure the exchange of knowledge and best practices through:

- Sharing relevant reports, studies, data, and educational materials;
- Organizing regular meetings to discuss progress and plan future activities.

### 5. Duration and Implementation Modalities

This MoU will be valid for 12 months from the date of signing, with the possibility of renewal by mutual agreement between the parties.

Activities will be planned and implemented through periodic meetings.

### 6. Management and Coordination

The parties will appoint a coordinator responsible for managing and overseeing the activities outlined in this MoU. The coordinator will act as the main point of contact for all matters related to the implementation and monitoring of activities.

### 7. Confidentiality



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- In the event of disputes regarding the interpretation or implementation of this MoU, the parties commit to resolving them amicably through dialogue and mediation.

Executed in Milan, on January 27.

For ANCI Lombardia:

Rinaldo Mario Redaelli – General Secretary

For Trasparenza international Italy:

Michele Calleri - President



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# Memorandum of Understanding between ANCI Lombardia and AB Corporation



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## MEMORANDUM OF UNDERSTANDING (MoU)

BETWEEN

**The National Association of Italian Municipalities Lombardy (ANCI Lombardia)**

AND

**AB Corporation**

GIVEN THAT

- ANCI Lombardia and AB Corporation recognize the importance of transparency, integrity, and the fight against corruption within public institutions;
- The parties agree on the value of raising awareness, educating, and promoting understanding of whistleblowing legislation and its applications in local governments, public entities, and private companies;
- Promoting the whistleblowing model is essential to enhance the effectiveness and efficiency of control systems, fostering a more ethical and accountable work environment;
- AB Corporation is partner of the Project GREENIFY (E+ Program, G.A. KA220-VET-D4C0EA03) and external advisor for the project RECOVER (DG Justice, G.A. 101091375) ;
- ANCI Lombardia and AB Corporation aim to develop synergies and collaborations that facilitate the sharing of best practices, knowledge, resources, and tools for improving whistleblowing policies at the European level;

### TERMS OF AGREEMENT:

#### 1. Objectives of the Collaboration

The parties commit to:

- Promoting the whistleblowing model and related legislation at the European level, to raise awareness among local governments, citizens, and other public and private organizations about the importance of reporting misconduct;
- Identifying and developing parallel initiatives and programs that support the adoption of whistleblowing policies in local governments and businesses at both national and European levels;



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- Creating and strengthening networks among national and international authorities to share experiences, knowledge, and best practices in the field of whistleblowing and anti-corruption

This will be achieved through:

- Organizing events, seminars, workshops, conferences, and training courses to raise awareness about whistleblowing;
- Participating in events, seminars, initiatives, and specialized courses on whistleblowing.

### 3. Commitments of the Parties

- The parties agree to:
  - Promote whistleblowing legislation through their institutional channels and among their members;
  - Support the dissemination of informational materials and best practices among Italian municipalities and publicly controlled companies;
  - Organize specific training events for Italian local administrations and public entities.

### 4. Knowledge Sharing and Best Practices

The parties will ensure the exchange of knowledge and best practices through:

- Sharing relevant reports, studies, data, and educational materials;
- Organizing regular meetings to discuss progress and plan future activities.

### 5. Duration and Implementation Modalities

This MoU will be valid for 12 months from the date of signing, with the possibility of renewal by mutual agreement between the parties.

Activities will be planned and implemented through periodic meetings.

### 6. Management and Coordination



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The parties will appoint a coordinator responsible for managing and overseeing the activities outlined in this MoU. The coordinator will act as the main point of contact for all matters related to the implementation and monitoring of activities.

### 7. Confidentiality

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### 8. Final Provisions

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- Any amendments or additions to this MoU must be agreed upon in writing by both parties.
- In the event of disputes regarding the interpretation or implementation of this MoU, the parties commit to resolving them amicably through dialogue and mediation.

Executed on January 28th

For ANCI Lombardia:

Rinaldo Mario Redaelli - General Secretary

For AB Corporation:

Andrea Boffi – Founder

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