



**Europe's Rail Joint Undertaking
Anti-Fraud Strategy
2026-2028**

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1. BACKGROUND

1.1 General context

The European Union (hereinafter: the EU) is facing great and unprecedented challenges, including inflation, post-pandemic recovery, rapidly progressing climate change and the war of aggression on Ukraine. Such challenges put an enormous strain on the EU budget. It is therefore important now, more than ever, that the EU budget is thoroughly protected and that EU funds reach their intended recipients. Any failure to do so damages the reputation of the EU and undermines public trust in EU bodies and institutions. Challenges described above, combined with rising threats to the EU financial interests such as transnational fraud, organised crime targeting EU funds or criminal networks using AI and crypto currencies to defraud the EU budget, call for comprehensive and robust EU Anti-Fraud framework.

The EU Anti-Fraud framework is comprised of policies, institutions and mechanisms established to effectively protect the financial interests of the EU by preventing, detecting, investigating and correcting fraud and other illegal activities that affect the EU budget. A set of EU laws and regulations underpins these efforts, providing necessary legal basis for anti-fraud actions and cross-border collaboration.

In particular, articles 310, 317 and 325 of the Treaty on the Functioning of the European Union (TFEU) constitute the primary legal basis regarding the protection of EU financial interests and fight against fraud. Under their provisions, the EU institutions and bodies implementing EU budget shall comply with sound financial management principle and shall counter fraud and any other illegal activities affecting the financial interests of the Union. Accordingly, under Article 36 of the Financial Regulation (FR), EU institutions and bodies implement the EU budget in compliance with sound financial management principle and applying effective and efficient internal controls, which include preventing, detecting, correcting and following up on fraud and other irregularities¹.

The EU Anti-Fraud framework has been marked by the establishment, in 1999, of the European Anti-Fraud Office (OLAF) with mandate to act as leading EC Service for developing EU anti-fraud policies. Crucial player in fight against fraud affecting EU budget over past 25 years, OLAF was set up to protect EU financial interests by investigating fraud, corruption and other illegal activities affecting EU budget, as well as serious misconduct by staff and members of EU bodies and institutions². Every year, OLAF drafts an Annual Report on the Protection of the European Union's financial interests (PIF report).

Another crucial actor of the EU Anti-Fraud framework, the European Court of Auditors (ECA) directly addresses fraud in its Special report No 01/2019: 'Fighting fraud in EU spending: action needed'³. ECA will continue to focus on fraud in the near future, following the announcement of the upcoming Special reports on "Anti-Fraud Strategy"⁴, "Member states' RRF control systems - fraud"⁵ and "Arachne"⁶.

¹ Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (recast).

² Decision 1999/352/EC, ECSC, Euratom of 28 April 1999 establishing the European Anti-Fraud Office (OLAF). Regulation (EU, Euratom) No 883/2013 concerning investigations conducted by the OLAF and repealing Regulation (EC No 1073/1999 and Council Regulation (Euratom) No 1074/1999.

³ European Court of Auditors Special Report No 01/2019 'Fighting fraud in EU spending: action needed'.

⁴ The report will assess the effectiveness of the 2019 CAFS at combatting fraud affecting EU expenditure, cf.: ECA Work Programme 2026+, p. 7. The report is to be published in 2026.

⁵ The report, to be published in 2026, will assess if Member States' control systems for managing funds received from the RRF effectively prevent, detect and, where appropriate, correct fraud, cf.: ECA Work Programme 2026+, p. 12.

⁶ The report will assess whether Arachne has been conceived, developed and implemented by the Commission in a way that is likely to ensure complete, accurate and useful information, and for those member states that use the data, whether they do so effectively, cf.: ECA Work Programme 2026+, p. 13. The report is to be published in 2027.

The European Commission (EC) adopted, in June 2011, its first Anti-Fraud Strategy⁷ (CAFS) which marked a milestone in shaping the EU Anti-Fraud framework. The current CAFS, amended in 2019, focuses on protecting the EU financial interests from fraud, corruption and other intentional irregularities and on the risk of serious wrongdoing inside the EU institutions and bodies. The 2019 version of the CAFS is accompanied by 2023 revision of the EC Anti-Fraud Strategy Action Plan⁸.

1.2 EU-RAIL context

The Europe's Rail Joint Undertaking (EU-RAIL or the JU) is a public-private partnership in the rail sector established by the Council Regulation (EU) No 2021/2085 of 19 November 2021 (the Single Basic Act or the SBA), in line with Article 187 of the TFEU. EU-RAIL is also the legal and universal successor in respect of all contracts, including grant agreements, concluded by its predecessor, the Shif2Rail Joint Undertaking (the S2R JU) which it replaced and succeeded. The EU-RAIL was established on 30 November 2021 when the SBA entered into force.

The objective of EU-RAIL is to deliver a high-capacity integrated European railway network by eliminating barriers to interoperability and providing solutions for full integration, covering traffic management, vehicles, infrastructure and services, aiming to achieve faster uptake and deployment of projects and innovations. To this effect, EU-RAIL is providing funding under the EU Framework Programme for Research and Innovation (R&I), namely under Horizon Europe (hereinafter referred to as HE), in the scope of the Multiannual Financial Framework (MFF) 2021-2027.

EU-RAIL overall budget⁹ amounts to EUR 1 200 000 000 and is currently managed by 27 EU-RAIL staff¹⁰. The primary means of the JU's financing of R&I actions are grants which represent about 90% of its overall operational budget implementation foreseen for the Horizon Europe. EU-RAIL has been piloting the lump sums form of grants since 2018, already under the Horizon 2020 (H2020) programme. Currently, under Horizon Europe, the JU applies exclusively the lump sums form of funding.

The JU's activities are set-up around one single Research and Innovation Programme delivered by two integrated pillars, the System Pillar and the Innovation Pillar, and complemented by a Deployment Group, altogether covering the full life cycle of R&I from blue sky to pre-deployment and pre-industrialisation processes. The System Pillar (SP) is implemented via contracts awarded as a result of a call for tender, in three areas: the SP Core Group, the SP expert groups and the SP – maintenance of ERTMS specifications. The Innovation Pillar is structured in 7 Flagship Areas (FA) leading to large scale demonstration, complemented by Transversal Topics (TT) which ensure the engineering integration of the Programme:

- FA1: Network management planning and control & Mobility management in a multimodal environment,
- FA2: Digital & automated up to autonomous train operations,
- FA3: Intelligent & integrated asset management,
- FA4: A sustainable and green rail system,
- FA5: Sustainable competitive digital green rail freight services,
- FA6: Regional rail services / Innovative rail services to revitalise capillary lines,
- FA7: Innovation on new approaches for guided transport modes,
- TT: Digital enablers.

⁷ European Commission Anti-Fraud Strategy.

⁸ European Commission Anti-Fraud Strategy Action Plan - 2023 revision.

⁹ As per SBA, without considering further possible contribution from the private members or contribution agreements or reduction from the EU budget.

¹⁰ Staffing data as per the AWP2026. The Staff Establishment Plan provides for 32 posts, out of which 4 dedicated to the Back-Office Arrangement (BOA) on Accounting - set up based on Article 13 of the SBA - where EU-RAIL has the lead.

Being a public-private partnership, the EU-RAIL activities are based on combined funding from the EU and from the private members of the railway industry. The vast majority of the JU's yearly budget (ca 97%) is spent in direct relation to its Research and Innovation Programme by means of grants and/or tenders, in the form of operational expenditure.

The former Shift2Rail Joint Undertaking ("S2R JU") introduced its first Anti-Fraud Strategy already in 2017, creating JU's very first Anti-Fraud framework. The EU-RAIL Executive Director approved the relevant decisions adopted under the former S2R JU that continued to apply to the EU-RAIL, including the Anti-Fraud Strategy 2017-2020, extended until 30/06/2022 and followed by the EU-RAIL Anti-Fraud Strategy 2022-2025. The latter reflected the start of EU-RAIL new R&I Programme under HE and its wide application of lump sum grants, piloted since 2018 by the former S2R.

The updated EU-RAIL Anti-Fraud Strategy 2026-2028 (the Strategy or AFS) further strengthens JU's comprehensive Anti-Fraud framework aligning it, *inter alia*, with OLAF 2024 Methodology and guidance for the anti-fraud strategies of EU Decentralised Agencies and Joint Undertakings¹¹, the 2023 revision of the EC Anti-Fraud Strategy Action Plan¹² and the 2023 CAFS in the Research and Innovation Family¹³. The EU-RAIL updated Strategy remains also aligned with DG MOVE Anti-Fraud framework.

Based on the outcome of the previous Anti-Fraud Strategy and on fraud risk assessment, the AFS 2026-2028 takes stock of EU-RAIL resources, defines its Anti-Fraud objectives, develops actions tailored to mitigate the most significant fraud risks and sets out performance indicators to track and assess progress towards the objectives. In the drafting of the EU-RAIL Anti-Fraud Strategy 2026-2028, the following elements were considered:

- Evaluation of EU-RAIL Anti-Fraud Strategy 2022-2025 and of the respective Action Plan
- Thorough analysis and assessment of fraud risks
- Elaboration of Strategy 2026-2028 using teamwork approach, involving all relevant actors: all EU-RAIL staff has been consulted during the elaboration of the Strategy (bottom-up approach). Externally, OLAF and DG MOVE were consulted
- Drafting of comprehensive and effective Action Plan and of underlying indicators.

The main objective of the Strategy is to raise awareness of Anti-Fraud methodology, actors and cycle and to equip staff with practical guidance on fight against fraud and other illegal activities affecting EU financial interest. The overarching goal of the EU-RAIL Anti-Fraud Strategy 2026-2028 is to help safeguard EU funds, maintain public trust, and ensure that financial resources are used effectively to achieve the EU-RAIL objectives, contributing to upholding the EU Anti-Fraud acquis and paving the way for all-in and fraud-proof EU Anti-Fraud framework.

1.3 Terms and definitions

For Strategy to become an every-day Anti-Fraud toolkit, it is essential that the terms and definitions are clarified and their meaning explained. This will help ensure clarity of concepts used in the Strategy and will in continuation enable establishment of comprehensive Action Plan, accommodating both the specificities of EU-RAIL and the requirement of proportionality and cost-effectiveness of controls.

In general terms **fraud** is an **intentional and deceptive act or omission** resulting in an **unlawful gain** for a perpetrator (or a third party) and causing a **loss to the EU financial interests**. **Intention** is key element distinguishing fraud from non-fraudulent irregularity affecting the EU financial interests. Three elements must coincide in order for fraud to occur: **pressure** as the motivation, **rationalisation** as the self-justifying attitude and perceived **opportunity** provided by inefficient internal control system.

¹¹ Ares(2024)4040978.

¹² COM(2023)405 final.

¹³ Ares(2024)1851642.

The definition of the term **fraud**¹⁴ in the context of the EU is provided in the Directive (EU) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law (the PIF Directive). According to the PIF Directive, fraud in respect of expenditure can be understood as any act or omission relating to¹⁵:

- the use or presentation of false, incorrect or incomplete statements or documents, which has as its effect the misappropriation or wrongful retention of funds or assets from the Union budget or budgets managed by the Union, or on its behalf,
- non-disclosure of information in violation of a specific obligation, with the same effect,
- the misapplication of such funds or assets for purposes other than those for which they were originally granted.

The PIF Directive defines other illegal activities that affect the EU financial interests and reputation:

- **Corruption (passive)**, meaning an action of a public official who, directly or through an intermediary, requests or receives advantages of any kind, for himself or for a third party, or accepts a promise of such an advantage, to act or to refrain from acting in accordance with his duty, in a way that damages or is likely to damage the EU financial interests.
- **Corruption (active)**, meaning an action of a person who promises, offers or gives, directly or through an intermediary, an advantage of any kind to a public official for himself or for a third party for him to act or to refrain from acting in accordance with his duty, in a way that damages or is likely to damage the EU financial interests.
- **Misappropriation**, meaning an action of a public official who is directly or indirectly entrusted with the management of funds or assets to commit or disburse funds or appropriate or use assets contrary to the purpose for which they were intended, in any way which damages the EU financial interests.

Another related term, "**irregularity**", is defined in Council Regulation (EC, EURATOM) No 2988/95 of 18 December 1995 on the protection of the European Communities financial interests¹⁶ as any infringement of a provision of Community law resulting from an act or omission by an economic operator, which has or would have, the effect of prejudicing the general budget of the Communities or budgets managed by them, either by reducing or losing revenue accruing from own resources collected directly on behalf of the Communities, or by an unjustified item of expenditure.

Pursuing to Article 61(3) of FR, **conflict of interest (COI)** exists where the impartial and objective exercise of the functions of a financial actor or other person is compromised for reasons involving family, emotional life, political or national affinity, economic interest or any other direct or indirect personal interest.

Red flags are warning signals or indicators of possible irregularities, fraud or corruption and are linked both to the prevention and to the detection part of the anti-fraud cycle. When more than one red flag is identified with regard to the same operation, project, transaction or beneficiary, then staff and managers should investigate further, carry out additional checks and assess the situation. The Executive Director has to be made immediately aware of the presence of such indicators to allow for taking further action, including notifying OLAF and suspending payments, when applicable.

¹⁴ Fraud affecting the European Communities' financial interests was defined in 1995 by means of the Council Act of 26 July 1995 drawing up the Convention on the protection of the European Communities' financial interests (95/C 316/03).

¹⁵ The Strategy addresses fraud in respect of expenditure not revenue, as the latter is not directly relevant to EU-RAIL.

¹⁶ OJ L 312, 23.12.1995, p. 1–4.

The EC Anti-Fraud Strategy and DG MOVE Anti-Fraud Strategy cover the following forms of misconduct:

- Fraud, corruption, misappropriation affecting EU financial interests, defined in the PIF Directive,
- Other criminal offences affecting EU financial interests, e.g.: abuse of procurement procedures,
- Irregularities as defined in Regulation (EC, Euratom) No 2988/95, insofar as they are intentional and not already captured by the criminal offences referred to in the first two bullet points,
- Serious breaches of professional obligations by staff or Members of the EU institutions and bodies.

EU-RAIL Anti-Fraud Strategy 2026-2028 tackles **fraud** in the latter, broad sense,¹⁷ thus encompassing:

- Fraud, corruption, misappropriation affecting EU financial interests (Art 3, Art 4 of PIF Directive)
- Other criminal offences affecting the Union's financial interests, e.g. offences linked to an abuse of procurement procedures where they affect the EU budget
- Irregularities as defined in Article 1(2) of Regulation (EC, Euratom) No 2988/95¹⁸ (insofar as they are intentional but not already captured by the criminal offences referred to above)
- Any other illegal activity affecting the financial interests of the EU
- Serious breaches of professional obligations by EU-RAIL staff or members of the Governing Board, as referred to in Article 1(4) of the OLAF Regulation, in the second subparagraph of Article 2(1) of Commission Decision (EC, ECSC, Euratom) No 352/1999¹⁹ and in Article 16 of the Staff Regulations, the latter as regards obligations after leaving the service.

The primary focus of EU-RAIL Anti-Fraud Strategy 2026-2028 and its Action Plan is fraud. Nevertheless, the measures and actions deployed by EU-RAIL in line with the Strategy have both the ambition and the potential to cover, to a reasonable extent, also other types of wrongdoings referred to above.

2. EVALUATION OF THE EXISTING STRATEGY AND ACTION PLAN

EU-RAIL first Anti-Fraud Strategy 2017-2020, adopted in 2017 and further extended to 30 June 2022, was assessed together with its Action Plan back in 2022 and both were deemed implemented. The updated EU-RAIL Anti-Fraud Strategy 2022-2025 followed, focusing on five main objectives:

1. Keeping the JU's internal legal framework related to anti-fraud policy up to date
2. Fostering an anti-fraud culture throughout the organisation
3. Maintaining high level of awareness and knowledge among the staff on the subject matter
4. Ensure high level of reactivity towards OLAF/EPPO
5. Prevent the misuse of internal information/data

EU-RAIL Anti-Fraud Strategy 2022-2025 was complemented by Anti-Fraud Action Plan, laying down specific actions aiming at mitigating risks related to fraud. The Action Plan has been monitored and reviewed on a yearly basis and its progress reported in the EU-RAIL Consolidated Annual Activity Report.

Based on the review of the EU-RAIL Anti-Fraud Strategy 2022-2025 and its Action Plan, it can be concluded that the five main objectives mentioned above were being fulfilled on an ongoing basis. However, it has to be noted that in the absence of an actual fraud case or suspicion of fraud, the fourth objective related to the reactivity towards OLAF was assessed mostly at the theoretical level.

¹⁷ OLAF Methodology and guidance for the anti-fraud strategies of EU Decentralised Agencies and Joint Undertakings of 1st May 2024, pp.13-14, Ares(2024)4040978.

¹⁸ Council Regulation (EC, Euratom) No 2988/95 of 18/12/95 on the protection of European Communities financial interests.

¹⁹ Decision 1999/352/EC, ECSC, Euratom of 28 April 1999 establishing the European Anti-Fraud Office (OLAF).

In the area of external fraud prevention, the JU focused primarily on raising awareness of its staff with regard to potential fraudulent behaviour of the participants to the actions funded by EU-RAIL or EU-RAIL contractors. This included providing trainings and information sessions in the area of red flags and raising awareness of fraud attempts and how to identify them.

With regard to the prevention of internal fraud a continuous strong tone from the top by the Executive Director accompanied the dissemination of information to the staff. This included information on sanctions in case of misconduct, implication in irregularities or fraud, and awareness raising trainings on fraud and on ethics and integrity.

In the field of prevention of information/data theft possibly followed by a fraudulent misuse of such information, apart from embedding the respective safeguarding measures into the design of the deployed IT infrastructure and IT systems/tools, the JU also paid attention to the physical security of its premises. In this respect, apart from other measures, lockable cabinets continued to be at the staff's disposal as well as a shredder and a locked container for disposal of sensitive documents. Furthermore, awareness of staff members regarding the importance of protection against data theft was continuously supported by means of information sessions and trainings.

In the fraud detection area, the logical assumption was applied that the existing legal framework and rules provided by the Commission, applied within the JU's day-to-day operations and standardised workflows, to a significant extent already mitigate the risk of potential fraud being undetected. To complement this, EU-RAIL has paid attention to provide its staff with additional trainings and information sessions on how to detect cases of potential fraud in practice.

The approach adopted by the EU-RAIL Anti-Fraud Strategy 2022-2025 and accompanying Action Plan proved to be efficient, and therefore similar focus will be considered for the EU-RAIL Anti-Fraud Strategy 2026-2028 and its Action Plan, without prejudice to any updates of objectives, actions and indicators resulting from the current exercise.

3. FRAUD RISK ASSESSMENT

3.1 European Commission fraud risk assessment

The 2019 version of the Commission Anti-Fraud Strategy is currently followed by 2023 revision of the EC Anti-Fraud Strategy Action Plan²⁰. The revised action plan is the result of an extensive Commission internal consultation process, led by OLAF and carried out mainly through the Fraud Prevention and Detection Network. While the 2019 CAFS remains valid, the main fraud risks and actions have been updated. Consequently, the following main fraud risks were identified:

- falsification of declarations and documents in procurement, grants, administrative expenditure
- double funding
- conflict of interest, corruption, favouritism or collusion
- misuse of insider information
- plagiarism
- undue influence
- unreliable counterparts
- undue access to IT devices, systems, bank accounts and hacking.

²⁰ European Commission Anti-Fraud Strategy Action Plan - 2023 revision, COM(2023) 405 final.

The revised EC Anti-Fraud Strategy Action Plan is focused on actions linked to new developments and most important fraud risks. Actions, altogether 44, are grouped in 7 themes, as follows:

1. Foster digitalisation and the use of IT tools to fight fraud
2. Support Member States to reinforce the protection of RRF, cohesion, agricultural, fisheries funds
3. Reinforce the protection of funds under indirect management and in the external relations area
4. Reinforce the EU capacity to fight customs fraud and protect EU revenues
5. Reinforce the EU anti-fraud architecture
6. Reinforce the Commission's anti-fraud governance and maintain a high level of coordination and cooperation among Commission departments and Executive agencies
7. Strengthen the culture of ethics and anti-fraud in the Commission.

3.2 Research Family fraud risk assessment

The 2019 Common Anti-Fraud Strategy for the Research Family (RAFS) states that *“as part of work on the next Research framework programme for 2021-2027, Horizon Europe, the Research Family is looking to create a fraud-proofing implementation system, based on the lessons learnt from Horizon 2020”*.

With this regards, and in view of the 2023 update of Anti-Fraud Strategy for Horizon Europe, the Research Family performed in Q2 2022, under the leadership of the Common Audit Service of DG RTD, a joint fraud risk assessment. The risks of external fraud related to grants were identified in the following categories:

- 1) Fake proposals
- 2) Fake projects or deliverables
- 3) Fake participant/beneficiary or misrepresentation of an existing legal entity
- 4) Fake researcher or researcher actually not working on the project/action, misrepresented experience of the researcher
- 5) Fake expenditure. Falsification and misrepresentation of invoices, contracts, time records, etc. with regard to, e.g., personnel costs, costs of equipment, travel costs, subcontracting costs
- 6) Intentionally overcharging personnel, equipment and travel costs
- 7) Fraudulent bankruptcy
- 8) Undisclosed conflict of interests with a subcontractor or fake/hidden subcontractor
- 9) Undisclosed conflict of interests with an (evaluator/monitoring) expert
- 10) Double funding
- 11) Plagiarism

Most of the identified potential fraud schemes, after considering the existing mitigating measures, were assigned a low level of residual risk, some of them reaching the medium level. It should be noted that these inherent risks are, to the respective extent, mitigated by the generally applied procedures and workflows following from the standard rules for grant management, even though these may not always be primarily aimed at fraud prevention or detection.

3.3 EU-RAIL fraud risk assessment

EU-RAIL performed in Q2 2022 its own qualitative dedicated fraud risk assessment focused on areas of potential internal fraud, thus complementing the abovementioned assessment conducted at the level of the Research Family for external fraud risks in grant management. It should be noted that apart from this specific activity, the assessment of risks which EU-RAIL faces, including risks of fraud, is also subject to the general annual risk assessment exercise. The fraud risks identified are included in the EU-RAIL overall risk register. Addressing fraud risks is therefore an integral component of EU-RAIL Internal Control Framework.

Risk assessment performed by EU-RAIL in Q3 2025 was carried out by means of desk reviews, interviews and brainstorming sessions. Staff contributed directly or through their line managers. Staff directly involved in the exercise was: Executive Director, Heads of Units, Internal Control Coordinator, Chief Legal Officer, HR Officer, IT Officer, Accountant, Financial Officer in charge of in-kind contribution monitoring, Communication Officer.

3.3.1 Internal fraud risks

EU-RAIL identified the following Internal fraud risks stemming from misconduct or irregular behaviour of staff or internal service providers:

No	RISK AREA	RISK CAUSE	RISK EVENT	RISK CONSEQUENCE	CONTROLS
1	Procurement	Favouritism, Gain - financial or other	Unjustified advantage, Unjustified direct award, Discriminatory or restrictive exclusion, selection or award criteria	Misuse of EU funds	Segregation of duties, 4-Eyes principle, Dual signature rule, justification included in procurement file
2	Recruitment	Favouritism, Irregular recruitment, False declarations	Bias in selection procedure, Recruitment under false pretences	Reputational, Recruited staff lacks expertise	Transparency of criteria, Panel screening of offers, Verify and include in recruitment file copies of education and work certificates
3	Conflict of interest	Undeclared interest, Undeclared activities	Bias in performance of duties	Misuse of EU funds, Reputational	Internal screening, Annual and ad-hoc COI declarations
4	Misuse of internal information	Favouritism, Gain - financial or other	Confidentiality breach, Disclosure of internal information	Misuse of EU funds, Reputational	Staff Regulations Art. 11a and 17 / Periodic and ad-hoc IT-access rights and IT-access reviews
5	Misuse of reimbursement schemes	False declarations, Inflated expenses or travel costs	Undue reimbursement	Misuse of EU funds	Pre-approval workflow, Ex-post checks

Internal fraud risks are considered to represent low or medium level of residual risk, after considering the existing mitigating measures and activities.

3.3.2 External fraud risks

External fraud risks derive mainly from beneficiaries, contractors or external experts involved in programme implementation. Main external risks pertain to grants and procurement, as follows:

No	RISK AREA	RISK CAUSE	RISK EVENT	RISK CONSEQUENCE	CONTROLS
6	Procurement	Collusion, Bid rigging (with or without internal assistance)	Bid-rigging company secured contract at inflated costs	Loss of EU funds, Reputational	Segregation of duties, Publication, Respect of equal treatment, non-discrimination, proportionality principles, Respect of competition requirements
7	Grants	Conflict of interest in evaluations and /or reviews	Existence of undeclared links between evaluators and applicants	Biased evaluation or review, Reputational, Misuse of EU funds	Mandatory COI declarations, contracting new experts and/or rotation of experts, exclusion procedure, screening
8	Grants	Fake deliverables or plagiarism	Inexistent and unverifiable outputs, Misappropriation of outputs	Misuse of EU funds, Reputational	Cross-check of project data using CORDA and SyGMA, Technical reviews of content and progress
9	Grants	Double funding, Misrepresentation of entities	Entity received funding under different PICs or in parallel grants	Misuse of EU funds, Reputational	PIC validation, LEAR documentation, EDES and data warehouse screening,
10	Grants	Misrepresentation or non-disclosure of entities excluded from EU funding	Undisclosed entities, excluded from EU funding, secured grant or part thereof	Misuse of EU funds, Sabotage Reputational	PIC validation, LEAR documentation, EDES and data warehouse screening
11	Grants (based on actual costs)	Inflated, misrepresented or ineligible costs	Costs overestimated, fake or inflated invoices and timesheets	Misuse or loss of EU funds, Reputational	Ex-ante and ex-post checks, CAS guidance, audits, CFS, data cross-checks

With regard to the external risk of fraud and considering the use of lump sums by EU-RAIL under Horizon Europe, it is nevertheless important to remind that, while in principle there are no financial ex-post checks for lump sum grants, in case of fraud suspicion the Granting Authority has obligation to inform the OLAF, who may conduct more in-depth investigations. With this respect, the recital 209 of Regulation (EU, EURATOM) 2024/2509 stipulates as follows: *“Where the amounts of lump sums, unit costs or flat-rate financing have been determined ex ante by the authorising officer responsible or by the Commission they should not be challenged by ex post controls. This should not prevent the reduction of a grant in the event of poor, partial or late implementation or of irregularity, fraud or a breach of other obligations.”*

4. MEANS AND RESOURCES

4.1 Internal resources

Similarly to other components of EU-RAIL Internal Control Framework, the effective application of its Anti-Fraud Strategy 2026-2028 is based on collective efforts of all staff, considering that all staff members are concerned with facing a potential issue of fraud²¹. EU-RAIL specific anti-fraud roles and responsibilities are outlined below and further described in the Action Plan (section 5.2):

EU-RAIL Governing Board

- Takes note of and expresses any recommendations, as applicable, regarding the JU anti-fraud policy, including the Anti-Fraud Strategy and Action Plan, based on information on the topic provided by the Executive Director.
- Assesses and approves, as part of the Consolidated Annual Activity Report, outcomes of the anti-fraud policy implementation and the related indicators.

Executive Director

- Approves the EU-RAIL Anti-Fraud Strategy and Action Plan.
- Approves methodological and guidance documents of the JU that contribute to fraud prevention/detection.
- Sets the tone and acts by example towards the staff in questions related to fraud.
- Communicates anti-fraud topics to the JU Governing Board, as necessary.
- Approves sanctions and other measures with regard to fraud cases.

Heads of Units

- Contribute to raising awareness of fraud among the staff in their Units.
- Steer the designing of particular ex-ante and ex-post checks and controls aimed also at prevention/detection of fraud.
- Contribute to the risk assessment process, including the risks of fraud.
- The Head of Corporate Services contributes to the drafting of the Anti-Fraud Strategy and the related Action Plan.
- The Head of Corporate Services, in coordination with the JUs BOA IT, sets activities and measures in respect of fraud-proofing of IT systems and tools applied in the JU.
- Suggest sanctions and other measures with regard to fraud cases.

Internal Control Coordinator

- Takes primary responsibility for drafting of the EU-RAIL Anti-Fraud Strategy and Action Plan.
- Steers the risk assessment process, including the risks of fraud.
- Advises on and participates in designing ex-ante and ex-post checks and controls aimed also at prevention/detection of fraud.
- Performs regular reviews and follow-up of the JU's anti-fraud Action Plan and communicates relevant updates related to the JU's anti-fraud policy to the staff.
- Acts as JU's alternate correspondent to OLAF and EPPO and participates as member to the activities of the FAIR Committee etc.

²¹ Regulation No 31 (EEC), 11 (EAEC), laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the EEC and the EAEC - Article 22a.

Chief Legal Officer

- Contributes to the drafting of the Anti-Fraud Strategy and the related Action Plan.
- Takes part in the risk assessment process, including the risks of fraud.
- Provides advice from the legal perspective, if a suspicion of fraud occurs.
- Acts as a “person of confidence” and correspondent to OLAF.
- Is a correspondent to the EPPO and a back-up for participations in the FAIR Committee meetings etc.

HR Officer

- Organises trainings and information sessions in the JU, including related to anti-fraud, ethics and integrity, conflict of interest and cybersecurity and collects evidence/certificates of staff attendance.
- Ensures deployment of revolving door principle and maintains JU’s revolving door register.

EU-RAIL staff

- Staff is aware of and adheres to internal rules on anti-fraud, ethics and integrity, conflict of interest and to reporting obligations.
- Staff performs checks and applies controls in line with the respective roles and responsibilities.
- Staff participates in anti-fraud, ethics and integrity, conflict of interest trainings and awareness activities and in other relevant trainings, when applicable (e.g.: cybersecurity).

It has to be noted that BOA Accounting Officers are involved in anti-fraud activities and measures with regard to the respective accounts they manage.

EU-RAIL will continue to use in its day-to-day operations the **IT tools** provided by the Commission which also enable to the applicable extent to deploy measures contributing to the fight against fraud. This includes setting up access rights and financial circuits in SUMMA in a way that allows for appropriate segregation of duties and transactions approval.

Another example are checks that might serve also in relation to potential fraud prevention/detection and which are embedded in the standardized workflows performed in Compass and SyGMA. EU-RAIL will continue to use the eGrants Data warehouse (formerly called the Common Research Family Data Warehouse - CORDA), the Framework Programmes’ central repository of data, in order to extract and subsequently analyse grant data based on reports and statistics made available by this portal.

The JU will also, when applicable, make use of both Early Detection and Exclusion System (EDES) established to reinforce the protection of the EU financial interests and to ensure sound financial management. Furthermore, EU-RAIL is aware of existence and open to the future use of Arachne²² and Arachne+ (future corporate Arachne)²³, if applicable.

²² Data mining and risk scoring (ARACHNE).

²³ Arachne+: the evolution of the EU data mining and risk-scoring tool.

4.2 External resources and synergies

Active and fruitful cooperation of all actors is crucial to ensure that EU Anti-Fraud framework remains highly impervious to fraud. Key institutions, bodies, offices and agencies include, *inter alia*, the European Anti-Fraud Office (OLAF), the European Court of Auditors (ECA), the European Union Agency for Criminal Justice Cooperation (Eurojust), the European Union Agency for Law Enforcement Cooperation (Europol), the European Public Prosecutor's Office (EPPO), the EU Authority for Anti-Money Laundering and Countering the Financing of Terrorism (AMLA) as well as Member States. In consequence, in addition to its internal capacities, EU-RAIL will actively cooperate with external parties, as further detailed below.

European Anti-Fraud Office

OLAF is an EU body, established in 1999, with mandate to carry out independent investigations into fraud, corruption and other illegal activities affecting the financial interest of the EU, as well as into serious misconduct within the European institutions. OLAF is also in charge of developing sound anti-fraud policy²⁴. EU-RAIL has adopted the Interinstitutional Agreement of 25 May 1999 concerning internal investigations by the European Anti-fraud Office (OLAF), as stipulated in the SBA²⁵. EU-RAIL plans to adopt, in cooperation with other JUs, the Administrative Working Arrangement with OLAF.

European Public Prosecutor's Office

The European Public Prosecutor's Office is an independent and decentralised prosecution office of the European Union with the competence to investigate, prosecute and bring to judgment crimes against the EU budget, such as fraud, corruption or serious cross-border VAT fraud. EPPO was established in 2017 and became operational on 1st October 2021²⁶.

Authority for Anti-Money Laundering and Countering the Financing of Terrorism

AMLA is a decentralised EU agency tasked with strengthening the EU framework of prevention of financial crime and responsible for developing guidelines on EU anti-money laundering and countering the financing of terrorism).

AMLA directly supervises selected financial sector entities operating on cross border basis and presenting high risk of money laundering and terrorism financing. The agency was established in 2024 and became operational on 1st July 2025²⁷.

EU-RAIL shall follow on the relevant regulatory developments, when applicable, and cooperate with AMLA, should the need arise.

Directorate-General for Mobility and Transport

EU-RAIL continuously follows up on the developments within its parent DG MOVE. In particular, EU-RAIL considers DG MOVE's Anti-Fraud Strategy and the related Action Plan as a source of reference. EU-RAIL consults any amendments to its own Anti-Fraud Strategy with DG MOVE before submitting it for approval to the Executive Director. In addition, DG MOVE would be informed by the JU about any relevant fraud-related issues that might impact the assurance the DG MOVE gains from EU-RAIL.

²⁴ Decision 1999/352/EC, ECSC, Euratom of 28 April 1999 establishing the European Anti-Fraud Office (OLAF).

²⁵ Single Basic Act - Article 30.

²⁶ Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office ('the EPPO').

²⁷ Regulation (EU) 2024/1620 of the European Parliament and of the Council of 31 May 2024 establishing the Authority for Anti-Money Laundering and Countering the Financing of Terrorism.

Directorate-General for Research and Innovation

The Common Audit Service (the CAS) of the Common Implementation Centre (CIC) in DG RTD was tasked with steering the set-up and coordinating the implementation of a common R&I fraud prevention and detection strategy for Horizon Europe and contributing to the development of anti-fraud policy and business processes²⁸.

CAS is responsible for chairing the Fraud and Irregularities in Research (FAIR) Committee, which is the main forum of the R&I family for matters of irregularity and fraud (in relation to grants) and serves as a network to exchange information, experience and best practices. The CAS is also member of the Fraud Prevention and Detection Network (FPDnet) chaired by OLAF. EU-RAIL cooperates in knowledge sharing by participating in the FAIR Committee. EU-RAIL also takes note of the Common R&I Anti-Fraud Strategy and Action Plan to ensure that the common goals are properly addressed.

Investigation and Disciplinary Office

The Investigation and Disciplinary Office of the European Commission (IDOC) carries out administrative inquiries to determine failures to comply with the Staff Regulations (e.g., absences, acceptance of gifts and favours, unauthorised external activities) as well as pre-disciplinary hearings following an IDOC inquiry or an OLAF investigation.

European Court of Auditors

The European Court of Auditors (ECA) contributes to fraud and irregularity prevention and detection by conducting audits focused on the EU budget and spending of EU funds. ECA auditors shall disclose to OLAF and to other competent authorities any fact of which they become aware when carrying out their duties, that could be qualified as a criminal offence. EU-RAIL actively cooperates with the ECA in the pursuit of its mandate.

Directorate-General Internal Audit Service

The internal audit function in EU-RAIL is performed by the EC internal auditor, Internal Audit Service (IAS). IAS auditors shall disclose to OLAF cases of presumed fraud, fraud suspicion or other criminal offences affecting the EU budget, encountered in the pursuit of their duties. IAS may provide an independent audit opinion on, *inter alia*, EU-RAIL anti-fraud policy, including the Anti-Fraud Strategy, the prevention and detection processes, or the controls put in place to reduce the risk of fraud. EU-RAIL actively cooperates with the IAS in the pursuit of its mandate.

Joint Undertakings

EU-RAIL cooperates closely with other Joint Undertakings, making use of their similarities and sharing knowledge and experience, also in the field of Anti-Fraud. The synergies between the JUs should become even more intensified and formalised based on the provisions of Article 13 of the SBA regarding the back-office arrangements, including support for audit and Anti-Fraud Strategy.

With this regard, on 11 December 2025, the JUs jointly confirmed their consensus on future BOA on audit and anti-fraud which is said to support general services and common mechanisms in areas like internal control framework, anti-fraud, ex-post audit and reviews²⁹.

²⁸ Commission Decision C(2021) 4472 of 24.6.2021 on the coordinated implementation of Horizon Europe.

²⁹ Note on Back-office arrangements established among the 10 Joint Undertakings, Ares(2025)11013490.

Collective structures: networks, committees

EU-RAIL participates in knowledge sharing activities in the following structures: Fraud and Irregularities in Research (FAIR) Committee, the R&I Family Services Network of Ex ante Control practitioners (RINEC), the Research & Innovation Audit Network (RIAN), Lumps Sums (LS) Practitioners Group and other, including ad-hoc, collective structures and working groups.

External contractors

Contracts with external auditors carrying out audits on the financial management of the EU-RAIL JU shall provide for an obligation of the external auditor to inform the Executive Director and the Governing Board of any suspected illegal activity, fraud or corruption which may harm the interests of the EU, of the EU-RAIL or of its members³⁰.

4.3 Legal and methodological means

The non-exhaustive list of the most relevant legal and methodological provisions in the context of which this Anti-Fraud Strategy of EU-RAIL will be applied is provided below, as well as the list of other reference documents considered for the purpose of drafting the Strategy 2026-2028. Future relevant documents that may emerge after the adoption of this Anti-Fraud Strategy will be reflected by means of regular reviews of the Action Plan.

4.3.1 EU level

Treaty on the Functioning of the European Union

Article 325 (1): The Union and the Member States shall counter fraud and any other illegal activities affecting the financial interests of the Union through measures to be taken in accordance with this Article, which shall act as a deterrent and be such as to afford effective protection in the Member States, and in all the Union's institutions, bodies, offices and agencies.

Council Regulation (EU) 2021/2085 establishing the Joint Undertakings under Horizon Europe

Article 19 (4)(t) and (s) defining as one of the Executive Director's responsibilities ensuring conduct of risk assessments and risk management for the joint undertaking and protecting the financial interests of the Union and of other members by applying preventive measures against fraud, corruption and any other illegal activities

Regulation (EU, EURATOM) No 883/2013 (OLAF Regulation)

Establishing legal framework for OLAF and its investigation powers in order to step up the fight against fraud, corruption and any other illegal activity affecting the financial interests of the EU.

Regulation No 31 (EEC), 11 (EAEC) laying down the Staff Regulations/CEOS

Article 11a (1): An official shall not, in the performance of his duties, deal with a matter in which, directly or indirectly, he has any personal interest such as to impair his independence, and, in particular, family and financial interests.

Article 17 (1): An official shall refrain from any unauthorised disclosure of information received in the line of duty, unless that information has already been made public or is accessible to the public.

Article 22a: Any official who, in the course of or in connection with the performance of his duties, becomes aware of facts which give rise to a presumption of the existence of possible illegal activity, including fraud or corruption, detrimental to the interests of the Union, or of conduct relating to the discharge of professional duties which may constitute a serious failure to comply with the obligations of officials of the Union, shall without delay inform either his immediate superior or his Director-General or, if he considers it useful, the Secretary-General, or the persons in equivalent positions, or the OLAF directly.

³⁰ Decision of the Governing Board No 8/2016.

Article 86: Any failure by an official or former official to comply with his obligations under the Staff Regulations, whether intentionally or through negligence on his part, shall make him liable to disciplinary action. Where the Appointing Authority or OLAF becomes aware of evidence of failure, they may launch administrative investigations to verify whether such failure has occurred.

Council Regulation (EURATOM, EC) No 2185/96 concerning on-the-spot checks and inspections

Laying down the provisions applicable to on-the-spot administrative checks and inspections carried out by the Commission in order to protect the financial interests of the Communities against irregularities.

Directive (EU) 2017/1371 on the fight against fraud to the Union's financial interests (the PIF Directive)

Establishing minimum rules concerning the definition of criminal offences and sanctions with regard to combatting fraud and other illegal activities affecting the Union's financial interests.

Commission Decision C(2021) 4472 final on the coordinated implementation of Horizon Europe and on the operating rules for the Common Policy Centre and the Common Implementation Centre for Horizon Europe, the Framework Programme for Research and Innovation (2021-2027)

Establishing, *inter alia*, the tasks of the common audit service in respect of steering the set-up and coordinating the implementation of a common research and innovation fraud prevention and detection strategy for Horizon Europe and contributing to the development of anti-fraud policy and business processes.

4.3.2 EU-RAIL level

The EU-RAIL Governing Board has approved the decisions adopted under the former S2R JU that will continue to apply to EU-RAIL³¹. Thus, references to S2R JU in those legal texts and other key documents shall be construed as references to EU-RAIL.

GB Decision N°7/2016 Concerning the terms and conditions for internal investigations in relation to the prevention of fraud, corruption and any illegal activity detrimental to the Union's interests

GB Decision N°8/2016 on the accession of the JU to the Interinstitutional Agreement of 25 May 1999 between the European Parliament, the Council and the Commission concerning internal investigations by OLAF

GB Decision N°3/2018 adopting rules on the prevention and management of conflicts of interests of the staff members of the JU

GB Decision N°7/2018 adopting rules on the prevention and management of conflicts of interests applicable to the bodies of the JU

GB Decision N°20/2018 adopting Guidelines on whistleblowing

GB Decision N°11/2019 adopting the JU's Financial Rules

In particular Articles 13, 14, 19, 24, 26, 54 and 58.

GB Decision N°01/2021 adopting the Rules of Procedure of the JU's Governing Board

In particular Articles 11, 12 and Annexes.

³¹ GB decision n° N° 02/2021.

5. EU-RAIL STRATEGIC ANTI-FRAUD OBJECTIVES AND ACTIONS

5.1 EU-RAIL Strategic Anti-Fraud Objectives

The aim of EU-RAIL Anti-Fraud Strategy 2026-2028 is to continue setting ambitious, yet realistic and attainable objectives. The focus remains on the measures that are directly manageable by the JU and that have the highest potential to address fraud within the particular environment in which EU-RAIL operates and given the resources at its disposal. In this respect, due account was taken also of the principles of cost-effectiveness and proportionality.

The primary focus of this Anti-Fraud Strategy and its Action Plan is on the fraud in the sense described in Section 1.3 of the Strategy. With this respect, the measures and actions to be applied by EU-RAIL in pursue of its anti-fraud objectives are meant to cover, to a reasonable extent, also a broader group of wrongdoings, included in the Commission's Anti-Fraud Strategy.

Considering all relevant experience, knowledge and currently available information, and taking account of the relevant facts summarized in the previous sections of this Strategy, the main Strategic Anti-Fraud objectives of EU-RAIL for the period of 2026-2028 are as follows:

- 1. Ensure the JU's internal legal framework related to anti-fraud policy is up to date**
- 2. Foster the culture of ethics and anti-fraud in the Europe's Rail**
- 3. Define and keep up-to-date roles and responsibilities related to anti-fraud in EU-RAIL**
- 4. Maintain high level of awareness and knowledge among the staff members on the subject matter**
- 5. Ensure high level of reactivity towards OLAF/EPPO**
- 6. Prevent the misuse of internal information/data**
- 7. Ensure that the risk of COI and potential COI is correctly assessed and mitigated for all staff**
- 8. Ensure that the risk of COI and potential COI is correctly assessed and mitigated for members of the Governing Board**
- 9. Ensure that fraud risk assessment is embedded in general risk assessment process**

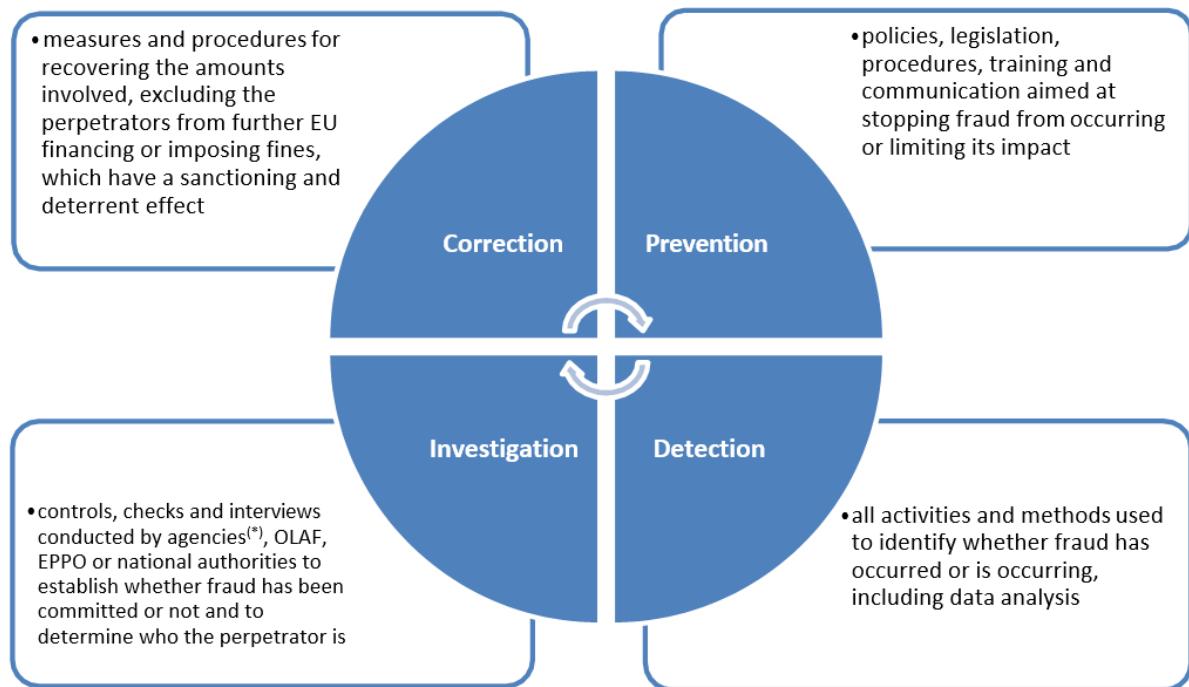
These objectives will be pursued by means of particular measures and actions listed in the Action Plan provided in the following Section 7.

In parallel to these objectives, EU-RAIL will also continue to contribute, when applicable, to the fulfilment of the common objectives defined in the Anti-Fraud Action Plan for the Research Family.

5.2 EU-RAIL Anti-Fraud Actions

EU-RAIL Anti-Fraud Strategy for 2026-2028, similarly to the previous one, is designed with the intention to cover, to the applicable extent, all four elements of the Anti-Fraud cycle, namely: prevention, detection, investigation and correction. These elements are depicted in the following figure³²:

³² OLAF Methodology and guidance for the anti-fraud strategies of EU Decentralised Agencies and Joint Undertakings of 1st May 2024, p. 20, Ares(2024)4040978.



5.2.1 Prevention

Together with this Strategy, the Action Plan (section 7) has been developed to reflect the objectives set up in the AFS and strengthen fraud prevention and detection in EU-RAIL. Raising awareness is one of the most effective measures to prevent fraud, other criminal offences, irregularities, misconduct or breach of professional obligations. EU-RAIL is committed to adequately train staff on the abovementioned wrongdoings and on the tools available to detect them. Compulsory trainings on anti-fraud and on ethics and integrity are provided for all staff and EU-RAIL may organise ad-hoc trainings and workshops, when required. Embedded in EU-RAIL internal control system, risk management encompasses also the risk of fraud. Regarding the management of grants, controls and procedures are mostly defined in rules and guidelines that apply across the R&I Family. The use of central IT tools further strengthens the management of EU funding programmes such as Horizon Europe.

In addition, EU-RAIL applies dedicated measures such as ex-ante checks and segregation of duties, and dedicated activities, such as keeping the internal legal framework up to date and raising awareness regarding penalties and other consequences of misconduct that have sanctioning and deterrent effect. The JU also raises awareness on conflict of interest and ensures that both Governing Board members and EU-RAIL staff provide, on a yearly basis, declarations on the absence of conflicts of interest.

5.2.2 Detection

All EU-RAIL staff have a responsibility at this stage of the Anti-Fraud cycle. Regarding grant management, Senior Programme Managers, Programme Managers and Financial Officers must be able to recognise the red flags in order to report them to the Head of the Programme and to the Executive Director.

The checks carried during the Grant Agreement preparatory phase include, among others: verification of the legal existence, financial and operational capacity of coordinators and beneficiaries, checks on the EDES database, checks on double funding and plagiarism, checks on experts' absence of conflict of interest.

The checks taking place during the implementation phase include assessment of deliverables, project monitoring, technical reviews, ex-ante controls prior to the approval of payments, checks on the EDES database, checks on experts' absence of conflict of interest, checks for identification of plagiarism or double funding. With this regard, EU-RAIL will keep the relevant staff updated regarding the methods and tools that can be applied in performing detective controls, as well as share with the staff the state-of-the-art knowledge on potential red flags by means of trainings and information sessions.

After the project implementation, the controls consist of audits carried out by the ECA, the CAS, external auditors, ex-post controls and checks performed by EU-RAIL. The JU will consider findings and recommendations resulting from audits and use them also as basis for improvement in the field of Anti-Fraud activities.

It is important to underline that all of aforementioned elements of control (ex-ante and ex-post controls, verification on COI, segregation of duties) and all actors involved (ECA, IAS, EU-RAIL staff), play essential role in fraud prevention and detection.

5.2.3 Investigation

Any member of the EU-RAIL staff, including national experts, that discover potential irregularities or have sufficient doubt or suspicion that fraud occurs or may have occurred, shall inform without delay the immediate superior, the Executive Director or the Governing Board of the EU-RAIL, or directly the OLAF or the European Public Prosecutor's Office. With respect to this element of the Anti-Fraud cycle, EU-RAIL acknowledges that any fraud investigation can only be carried out by OLAF or by the EPPO. While not directly engaging in investigations on its own, the JU will continue to provide full cooperation to these bodies and ensure high level of responsiveness to their requests.

5.2.4 Correction

Grant agreements, model contract for experts and the rules for validation, provide for contractual corrective measures such as rejection of ineligible costs, recovery of undue amounts, liquidation of damages, reduction of the grant, suspension of payments or projects, possibility to terminate the participation of a beneficiary or the grant agreement. Based on findings from controls, checks, reviews, audits or OLAF investigations, the ED can request the recovery of funds from the beneficiary and apply further sanctions, such as registration in EDES and financial penalties.

For suspected systemic issues an audit may be considered to confirm an extrapolation of the potential impact to other grants concerned. Beneficiaries for which a risk is identified are registered in EDES under an early detection case, and beneficiaries who have committed an irregularity in the implementation of the action may, under certain conditions, be excluded from further participation in grant or procurement award procedures in EDES and/or be imposed financial penalties. While no specific fraud-related corrective measures have been applied by EU-RAIL so far, the JU is committed to taking comprehensive corrective actions, should the case occur.

6. MONITORING, REPORTING, COMMUNICATION

6.1 Monitoring

EU-RAIL Anti-Fraud Strategy 2026-2028 is complemented by Anti-Fraud Action Plan, laying down specific actions aiming at mitigating risks related to fraud. The Action Plan is monitored and reviewed on a yearly basis and its progress reported internally to the EU-RAIL Executive Director and externally in the Annual Work Programme and in the Consolidated Annual Activity Report. The Action Plan is also updated at least once per year, to enable the assessment of the performance of the Strategy against the dedicated Anti-Fraud indicators included in the Action Plan. The additional monitoring activities, to be implemented if and when required, consist of dedicated meetings and reviews of implementation of the AFS in the specific areas, or else of ad-hoc reviews of the AFS or the Action Plan.

6.2 Reporting

The reporting process ensures transparency and accountability in the implementation of the Anti-Fraud Strategy and is part of EU-RAIL annual reporting cycle. The progress in the achievement of EU-RAIL Anti-Fraud objectives as well as any other significant risk, event or development related to fraud are reported to the JU Executive Director. In parallel, the Governing Board is regularly informed on the progress in implementation of Anti-Fraud Strategy and on the state of play regarding key risks. The aim is to ensure that the Board remains duly informed and can, where appropriate, provide guidance or recommendations.

Externally, the progress of implementation of the Anti-Fraud objectives is reported in the Annual Work Programme and in the Consolidated Annual Activity Report. The reporting covers actions carried out to implement the Strategy during the reporting year and the performance, measured against the Anti-Fraud indicators included in the Action Plan. When applicable, cases of alleged fraud or potential irregularities have to be reported to OLAF or to the EPPO through the established channels.

6.3 Communication

The main objective of communication on anti-fraud matters is to inform, raise awareness and engage all EU-RAIL staff, Governing Board and external stakeholders. Communication on anti-fraud is crucial insofar as it is both the first and the last action of Anti-Fraud cycle in a broad sense. It is a starting point when EU-RAIL anti-fraud actors are informed of their roles, responsibilities and on expected actions. At the same time, communication on the progress of Anti-Fraud Strategy and Action Plan marks a closure of Anti-Fraud cycle for a given reporting period. For the purpose of communication on anti-fraud matters EU-RAIL uses multiple communication channels, depending on the needs and audience targeted, e.g. through dedicated Anti-Fraud section on the EU-RAIL Intranet, publishing Anti-Fraud Strategy on the EU-RAIL website, by means of updates and presentations to the Governing Board, internally via email to management or all staff, or in the EU-RAIL Team meetings.

Communication is also a two-way tool: EU-RAIL staff and stakeholders contribute to the fraud risk assessment and take active part in the EU-RAIL Anti-Fraud cycle. Their input and feedback are at the cornerstone of EU-RAIL actions tackling fraud.

7. EU-RAIL ANTI-FRAUD ACTION PLAN

The following actions and measures will be applied by EU-RAIL to fulfil its Anti-Fraud Strategy for 2026-2028. The actions will be followed up, and the Action Plan will be assessed for potential updates regularly, once a year. Such reviews will allow for inclusion of new anti-fraud measures and for amendment of the existing ones, to accommodate changes in the JU's fraud risk environment, and updates of the anti-fraud policies, strategies and action plans of the EC (CAFS), the Research Family (RAFS), and DG MOVE. EU-RAIL fraud risks referenced in the Action Plan below are described in section 3.3 of the Strategy.

Strategic Anti-Fraud Objective	Fraud Risk	Action	Owner	Indicator	Target
No. 1: Ensure EU-RAIL internal legal framework related to anti-fraud policy is up to date	1, 4, 5, 6, 11	1.1. EU-RAIL internal legal framework related to the anti-fraud matters is regularly reviewed in order to keep it up to date and complete.	Internal Control Coordinator Chief Legal Officer	Number of reviews, and updates when applicable, of EU-RAIL internal legal framework related to anti-fraud matters	One review per year
No. 1: Ensure EU-RAIL internal legal framework related to anti-fraud policy is up to date	1-11	1.2. Ensure appropriate level of cooperation with parent DG MOVE: a) Consultation on the revision of the JU AFS b) Share practices or information on fraud risk environment with its OLAF correspondent c) Provide to DG MOVE fraud-related information that may have material impact on its assurance process.	Internal Control Coordinator	Number of fraud-related written communications with DG MOVE	a) In case of revision of AFS b) One per year c) When applicable
No. 2: Foster the culture of ethics and anti-fraud in EU-RAIL	1-11	2.1. EU-RAIL management strives for ensuring the appropriate overall anti-fraud culture throughout the organisation and sets the tone at the top by conveying messages to staff on the subject matter stressing the importance of acting according to the highest professional and ethical standards.	Executive Director	Number of messages / communications on anti-fraud matters addressed to the staff by the Executive Director.	At least two communications per year

No. 2: Foster the culture of ethics and anti-fraud in EU-RAIL	1-11	2.2. EU-RAIL bodies are informed about the JU's anti-fraud policy and its practical application and their members are reminded of their duties related to the subject matter, most importantly on the obligation of reporting any conflicts of interests.	Executive Director	Number of communications on anti-fraud matters to EU-RAIL Governing Board and other JU bodies, as applicable.	At least one communication per year
No. 2: Foster the culture of ethics and anti-fraud in EU-RAIL	1-11	2.3. Participate in the Research Family anti-fraud activities by contributing to common discussions, outputs and documents. Using the knowledge shared within the Research Family in JU's internal anti-fraud documents, activities and trainings.	Internal Control Coordinator Chief Legal Officer (as alternate for FAIR meetings)	Number of participations in FAIR, RIAN, RINEC meetings Number of instances of knowledge sharing	Participation ≥80% Ad hoc response to requests from the Research Family
No. 3: Define and keep up to date both roles and responsibilities related to anti-fraud in EU-RAIL	1-11	3.1. Roles and responsibilities related to anti-fraud in EU-RAIL are defined and up to date.	Executive Director Internal Control Coordinator	Number of revisions of roles and responsibilities related to anti-fraud in EU-RAIL	One revision per year
No. 4: Maintain high level of awareness and knowledge among the staff members on the subject matter	1-11	4.1. The EU-RAIL staff members are regularly provided with information and updates with regard to anti-fraud matters by means of dedicated section on the JU's intranet.	Internal Control Coordinator Comms Team	Number of communications to the staff on dedicated anti-fraud section on JU's intranet and on its content	At least one communication per year
No. 5: Ensure high level of reactivity towards OLAF/EPPO	1-11	5.1. Ensure comprehensive and timely cooperation with OLAF and EPPO, swift transmission of new cases and swift provision of	Executive Director Chief Legal Officer as	Time between detection and communication to OLAF/EPPO	Within 14 days

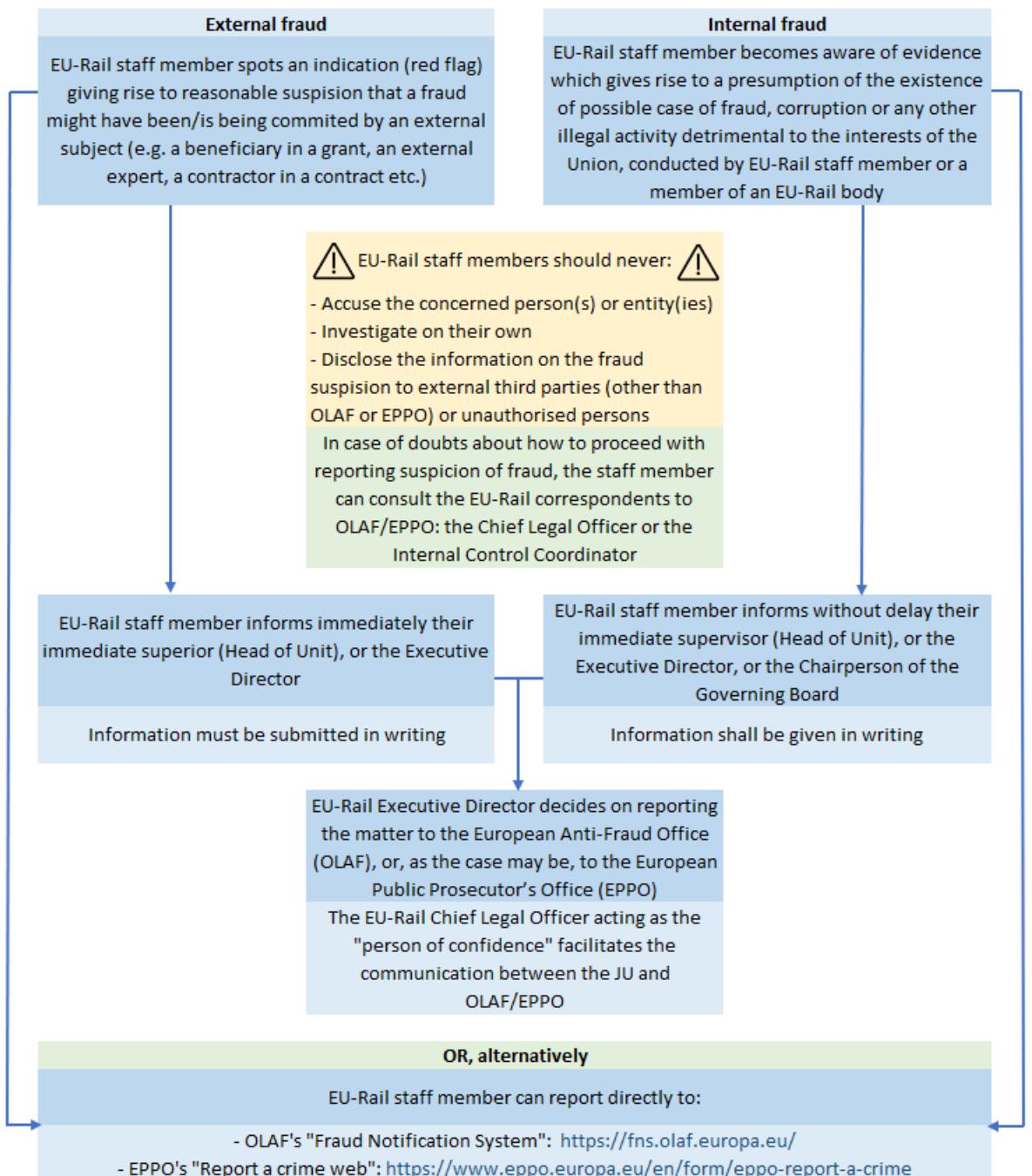
		requested information and documents in cases within their remit.	JU's correspondent to OLAF/EPPO	Time of response to OLAF/EPPO request for information/documents	Within 14 days
No. 5: Ensure high level of reactivity towards OLAF/EPPO	1-11	5.2. Ensure appropriate follow-up and the necessary action based on the results of OLAF's/EPPO's investigations and other activities by means of recovery of the concerned amount of funds, application of administrative sanctions and other measures.	Executive Director Head of Corporate Services Head of Innovation Pillar Head of System Pillar	Application of recovery order, administrative sanctions or other measures	100% of cases received follow-up and action
No. 5: Ensure high level of reactivity towards OLAF/EPPO	1-11	5.3. Adopt, in concentration with other JUs, Administrative Working Arrangement with OLAF in order to create structured cooperation framework between EU-RAIL and OLAF and facilitate timely exchange of information.	Executive Director Internal Control Coordinator Chief Legal Officer as JU's correspondent to OLAF/EPPO	Adoption of Administrative Working Arrangement with OLAF	End 2026
No. 6: Prevent the misuse of internal information/data	1-11	6.1. Regular information sessions and trainings are organised for EU-RAIL staff on: - red flags to prevent or detect external fraud and related controls/checks that can be performed, - OLAF fraud cases, - reminders of staff duties (e.g. declaring potential or actual conflicts of interests), - internal process for reporting suspicion of fraud, - applicable penalties and measures in case of staff fraudulent behaviour,	HR Officer with the support of other staff members and external parties on specific issues (e.g. Internal Control Coordinator, Chief Legal Officer, Head of Corporate Services, OLAF)	Number (and content) of information sessions/trainings	At least one information session/training per year

		- reminders of measures to be applied in the field of internal information/data leakage prevention (physical security, IT security)			
No. 6: Prevent the misuse of internal information/data	4	6.2. Ensure that staff leaving the JU is informed on revolving door principle and has signed the revolving door declaration.	HR Officer	Number of staff who at the end of employment, was informed about the revolving door principle and signed the respective declaration	100%
No. 7: Ensure that the risk of COI and potential COI is correctly assessed and mitigated for all staff	1, 2, 3, 4, 6, 7	7.1. COI declarations signed by EU-RAIL staff on a yearly basis	Executive Director Internal Control Coordinator HR Officer	Number of staff who signed COI declarations	100%
No. 8: Ensure that the risk of COI and potential COI is correctly assessed and mitigated for members of the Governing Board	1, 2, 3, 4, 6, 7	8.1. COI declarations signed by Governing Board members on a yearly basis	Executive Director Internal Control Coordinator Executive Assistant	Number of Governing Board members who signed COI declarations	100%
No. 9: Ensure that fraud risk	1-11	9.1. Fraud risk assessment embedded in general risk assessment process	Executive Director		One exercise per year

assessment is embedded in general risk assessment process			Internal Control Coordinator	Fraud risk assessed as part of annual risk assessment exercise	
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8. ANNEX

This Annex provides a guidance on the reporting in case a suspicion of fraud is detected.





<https://rail-research.europa.eu>