



Measures for the prevention of corruption and for the guarantee of transparency and integrity

LAG Eoro – Mixed Consortium Company with limited liability

Law n. 190/2012

Legislative Decree. n. 33/2013

A.N.P. 2016 - Deliberation n. 831 of 3rd August 2016

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Premise

The legislation on the prevention of corruption and the protection of transparency and integrity was reformed with the introduction of Legislative Decree n. 97/2016 «Revising and simplifying the provisions on the prevention of corruption, publicity and transparency, corrective of the law of 6th November 2012, n. 190 and of the legislative decree 14th March 2013, n. 33, under article 7 of the law of 7th August 2015, n. 124, concerning the reorganisation of public administrations».

According to the new regulation, it remains the obligation of administrations and entities equivalent to them, to take measures to ensure transparency, publicity and integrity in the performance of their respective activities and procedures.

The LAG Eloro - Mixed Consortium Company with limited liability, pursuant to art. 2-bis of Legislative Decree n. 33/2013, is subject to the same regulation envisaged for public administrations in the strict sense, for what concerns the obligations in terms of transparency, publicity and integrity, while, as regards the prevention of corruption, it remains confirmed that it is not required to adopt a Three-Year Plan for the Prevention of Corruption, but specific preventive measures, intended to integrate the organisation and management model, pursuant to Legislative Decree n. 231/2001 and with respect to which the Anti-corruption National Plan A.C.N.A. (Anti-Corruption National Authority) represents an act of guidance, as affirmed by art. 1, paragraph 2-bis of Law n° 190/2012 and as introduced by Legislative Decree n° 97/2016.

The LAG Eloro - Mixed Consortium Company with limited liability, has adopted its own measures to prevent corruption, modelling them on the basis of the provisions of the A.N.P. (Anti-corruption National Plan) 2015.

In the first elaboration it was carried out a detailed mapping of the operational areas subject to risk; specifically, peculiar control procedures have been identified and partitions of competences have been introduced that are deemed adequate to prevent the onset of corruption.

SECTION I

CORRUPTION PREVENTION PLAN

1. Company Profile

The LAG Eoro – Mixed Consortium Company with limited liability, is constituted in the form of a MIXED CONSORTIUM COMPANY with limited liability, by a public deed, drawn up with a notarial deed on 29/10/1998. The company is non-profit and does not divide profits, but pursues the aim of carrying out all the necessary and possible actions, aimed at the integrated development of its reference area, the "Eoro" district consisting of the territories of the Municipalities of Avola, Noto, Pachino, Portopalo di Capo Passero and Rosolini, in the southern area of the province of Syracuse. The share capital consists of the shares paid by the members, the amount of which is € 1,020. The Regional Province of Syracuse, today Free Municipal Consortium, has subscribed n° 8 shares.

2. Law n. 190/2012 and the corruption prevention system

The reference regulatory text on the prevention of corruption is represented by Law n. 190/2012, as amended by Legislative Decree n° 97/2016, which introduces the "Provisions for the prevention and repression of corruption and illegality in the public administration".

The system of prevention and repression of corruption set up by the regulatory text outlines a strategy on two levels: a central and a peripheral level. In the first of them it is expected to be adopted by the A.C.N.A. (Anti-Corruption National Authority) an Anti-corruption National Plan (A.N.P.) The peripheral level provides for the adoption by each public administration of a Three-year Corruption Prevention Plan (TCPP) which, based on the indications contained in the ANP, allows for an assessment and analysis of the specific corruption risks, identifying the organisational measures deemed suitable to prevent them. The system thus conceived responds to the aim of ensuring coherence and basic organicity to the national strategy to fight corruption, without affecting the autonomy of the peripheral administrations.

3. The position of companies and private law entities equivalent to the Public Administration in the reference regulatory framework

The position of companies and bodies governed by private law equivalent to the Public Administration due to the community nature of the economic resources that are assigned and managed by the Regional Councillorship of Agriculture, Rural Development and Mediterranean Fishing - Regional Department of Agriculture, 3rd Service of the Sicilian Region, as Delegated Body, like the LAG Eoro - Mixed Consortium Company with limited liability, were the subject of regulatory references that were often unclear and poorly coordinated within Law n. 190/2012, as well as in the context of Legislative Decree n. 33/2013 on the reorganisation of the regulations relating to the obligations of publicity, transparency and dissemination of information by public administrations. The complexity of the regulatory framework of reference and the aforementioned disorganisation of the regulatory provisions relating to companies and entities governed by private law equivalent to Public Administrations, have prompted A.C.N.A. to intervene by formulating clearer guidelines with reference to the applicability of the above mentioned entities of the measures to prevent corruption and those relating to transparency and publicity.

With ACNA Determination n. 8 of 17/6/2015, the "Guidelines for the implementation of the legislation on the prevention of corruption and transparency by companies and private law entities equivalent to public entities" were therefore approved, addressed not only to these companies and private law entities, but also to the controlling administrations that, in relation to the powers they exercise towards the formers, and the indissoluble organisational, financial or functional bond that binds them, have the task of promoting, within them, corruption prevention activities.

The aforementioned guidelines are further clarified and developed by the provisions of the A.N.P. 2013 - 2016 and in particular from § 3.1.1. The spirit of the legislation under Law n. 190/2012 is to prevent the onset of corruption in the sectors most at risk where public administrations, public resources or in any case the care of public interests are involved. Assuming that participated companies working thanks economic resources of Community origin, as in the case of LAGs, by virtue of the influence exercised on them by the Public Administration, are exposed to risks similar to those of the controlling administrations or participants in the capital and the administration, the legislation in question provides that the companies themselves must strengthen the anti-corruption measures already adopted pursuant to Legislative Decree n. 231/2001, or introduce them *ex novo*

where it's absent the organisation and management model adopted pursuant to the regulatory text now referred to.

The regulatory systems outlined respectively by Legislative Decree n. 231/2001 and by Law n. 190/2012 are different from each other, first of all in relation to the type of crimes they are aimed at preventing respectively. In fact, the first concerns only the cases attributable to extortion, undue inducement to give or promise benefits and corruption, where committed in the interest or even to the advantage of the company; whereas the second concerns the whole range of crimes against the Public Administration and interests all situations of "maladministration" even if committed to the detriment of the company. Companies with public shareholdings and whose functioning is subject to the receipt and management of economic resources of Community origin, including the LAG Elero, in a perspective of the measures coordination and the obligations simplification, are therefore required to integrate the organisation and management model, pursuant to Legislative Decree n. 231/2001 with the adoption of suitable measures to prevent the onset of corruption within it in accordance with the provisions of Law n. 190/2012.

4. Objectives of the corruption prevention measures

The purpose of these corruption prevention measures is to promote prevention and offer a tool to contrast corruption phenomena abstractly configurable in the functional and procedural organisation of the LAG Elero – Mixed Consortium Company with limited liability, implementing the activities of analysis and evaluation of the specific risks of exposure to corruption in the Entity and thus indicating particular organisational measures aimed at preventing the same risks. They intend to promote compliance by the entire staff and the administrative and control bodies with the principles of legality, transparency and fairness and are not proposed as a definitive system, bearing in mind, on the contrary, that the tools and strategies provided will be cyclically changed and improved according with the observation of the results obtained in their concrete application.

The measures envisaged therefore aim to affect the mechanisms of the Entity by favouring:

- a) the reduction of opportunities that corruption cases arise;
- b) increasing of efficiency in identifying cases of corruption;
- c) the creation of an unfavourable context for corruption.

5. Corruption according to the spirit of Law n. 190/2012

The legal concept of corruption as well as profiled by Law 6 November 2012. n. 190, attributable to any form of behaviour which in itself can merely expose to the risk of creating situations of probable illegality, appears objectively more extensive than what is expressly provided for in penal proceedings. This institute notes how to those legislative cases that imply all the multiple circumstances in which, in the course of the administrative activity, abuses by a subject of power entrusted to him, emerge in order to obtain private advantages, we have to add dysfunctions and / or administrative malfunctions resulting from the irregular use of the assigned functions, as well as those multiple situations involving the pollution of the administrative action, both at internal and external level, which also include the hypothesis of only attempted administrative pollution. Although the LAG Eloro - Mixed Consortium Society with limited liability, has not been formally established as a Public Administration, it is formally recognised as a "body governed by public law", for which there are preventive needs, as it is called upon to manage services of public interest, through the use of public resources and, prevalent but not exclusive, EU origin. In fact, the LAG Eloro fully meets the provisions of the Decree. N. 50/2016 of 18 April 2016, art. 3, paragraph 1, letter d), implementing Directive 2014/24/EU, which defines as a «body governed by public law», any body: 1) set up to specifically meet needs of general interest, not having an industrial or commercial character; 2) with legal personality; 3) whose activity is financed on a majority basis by the State, by local public bodies or by other bodies governed by public law or whose management is subject to the control of the latter or whose administrative, management or supervisory body is constituted by members, more than half of whom are designated by the State, by local public bodies or by other public law bodies.

6. The organisation and management model pursuant to Legislative Decree n. 231/2001 and corruption offences

The Legislative Decree n. 231/2001 introduced the liability of legal persons in relation to offences committed within itself and to their benefit or in their interest. This text also provides that legal persons who demonstrate that they have adopted and effectively implemented organisational and management models designed to prevent the commission of crimes of the type that actually occurred can be exempt from liability.

The LAG Eloro - Mixed Consortium Society with limited liability, therefore equips itself with a system aimed at preventing the commission of, among others, crimes against the Public

Administration referred to Title II, Chapter I of the Penal Code and in particular the crimes referred to Articles 317, 318, 319 *bis*, 320, 321, 322 and 640, since they are considered to be at greater risk of commission.

Starting from the assumption that the corruptive event, as outlined in Law n. 190/2012 has, as previously stated, a very wide scope and such as to include both the types of offences envisaged and punished by the Penal Code, and the situations in which, regardless of the criminal relevance of the conduct, there is a malfunction of the administration, the LAG Eloro - - Mixed Consortium Society with limited liability, has deemed it necessary to strengthen its preventive action by extending it to the risk of committing crimes against the Public Administration not considered in the context of Model 231 and of conducts integrating the malfunctioning of the administration.

7. The subjects involved in the prevention activity

A) The Corruption Prevention Responsible

In accordance with art. 1, paragraph 7 of Law n. 190/2012 all Public Administrations must appoint an Internal Corruption Prevention Manager. The A.N.P. adopted with ACNA. Determination n. 72/2013 and the Guidelines referred to in ACNA Determination n. 8/2015 and the 2015 Update of the aforementioned A.N.P., have extended this regulatory provision to companies and private law entities equivalent to Public Administrations.

In fact, in the case of private law entities, these guidelines provide that the CPR, identified by the CEO of the Company, is appointed by the Board of Directors. No additional remuneration is paid to the CPR and its functions must be carried out in close coordination with those of the supervisory body pursuant to Legislative Decree n. 231/2001. In light of the small corporate size of the LAG, the functions of the Supervisory Body and those of the CPR are combined in a single person represented by an employee. The person in charge must not have been the recipient of judicial conviction or disciplinary measures and must have demonstrated integrity over time. The existence of situations of conflict of interest is also a cause for exclusion.

The CPR proceeds, also in relation to the observations presented by the rest of the employees, to formulate the CPP - Corruption Prevention Plan; he proceeds with the formulation of the proposed amendments to the plan by 30/12 of each year; monitors the effective implementation of corruption prevention measures, and verifies their effectiveness; approves and publishes the report on the results achieved on the company's Website.

As with the innovations introduced on the legislative level the Corruption Prevention Responsible also takes upon itself the function of Transparency Responsible, thus becoming the Prevention and Transparency Responsible PTR.

B) The Board of Directors of the Company

The BoD is the body responsible for: the formal appointment of the Corruption Prevention Responsible and the supervisory activity on his work; the approval of the Corruption Prevention Plan and the related update proposals; the adoption of general policy measures aimed at preventing corruption; the acknowledgement of the report prepared annually by the CPR.

C) The Managers

The Managers who operate at risk of corruption, as indicated in the present measures: they are part of the risk analysis, assessment and management process; they have information obligations towards the CPR; they propose the adoption of preventive measures; they carry out information and training activities for the staff assigned to them; they are required to comply with the Corruption Prevention measures.

D) Employees, collaborators and assignments holders and consultants

All employees, including collaborators, office holders and consultants, are required to fully comply with the Corruption Prevention measures and are burdened with the obligation to highlight unlawful situations.

8. The path for adopting measures to prevent corruption

The adoption of the measures takes place through the active participation of all interested parties, within the deadline of January 31: this deadline also applies to the updating of the measures in force. Interested parties can participate in the adoption process and are therefore invited to make comments, which will be taken into account if compatible with current legislation and if useful to improve the definition of Prevention measures.

9. The whistle-blowing

The LAG Eloro - Mixed Consortium Company with limited liability identifies whistle-blowing as a mechanism aimed at identifying situations of illegality and criminal relevance, guaranteeing the protection of the position of the employee who, upon becoming aware of it, reports it to the CPR.

According to the provisions of art. 1, paragraph 51 of Law n. 190/2012 "except in cases of liability by way of slander or defamation, or for the same reason pursuant to art. 2043, the public employee who reports to the judicial authority or the Court of Auditors, or reports to his superior illegal conduct of which he has become aware by reason of his the employment, cannot be sanctioned, fired or subjected to a discriminatory measure, direct or indirect, having effects on working conditions for reasons connected directly or indirectly to the complaint". Reports and communications of even potential illicit situations may therefore become the subject of reporting to the CPR which will ensure the anonymity of the reporting party and the conservation of the information received. The RPCT, both in the case in which the corrupting event occurs, as in the reverse case, welcomes any measure necessary to preserve the secrecy of the identity of the reporting, which is guaranteed in every context after reporting and may be revealed only in cases required by law.

10. Identification of processes with the highest corruption risk (so-called risk mapping)

The development of an effective plan that includes measures and strategies aimed at preventing corruption is represented by the identification of potential corruption risks hidden in the activities and processes through which the action of the LAG Eoro - Mixed Consortium Company with limited liability unfolds as the subject to whom the care of public interests is entrusted.

An accurate risk analysis, aimed at managing it, is divided into several phases: it is first necessary to start by identifying the areas most exposed to the risk of the occurrence of corruption events, and then move on to the identification of these risks. The examination and evaluation of the same determines the contents of the preventive measures and strategies. This is followed by monitoring of the risks themselves and at the same time of the measures put in place in order to verify their effectiveness and efficiency.

The two main dimensions that the A.N.P. provides to be kept in mind in the planning of the anti-corruption system are:

- the probability of occurrence of corruption phenomena within the framework of a given process based on the presence of discretionary decision-making activities or which involve external contacts;
- the impact of the eventual occurrence of the event and therefore the estimate of the resulting material or image damage.

The risk index results from the product of the two factors just indicated. The main four risk areas identified by the A.N.P. concern as many specific areas in which the activity of the LAG Eloro - Mixed Consortium Company with limited liability is divided:

1. acquisition and progression of personnel;
2. assignment of works, services and supplies;
3. measures extending the legal sphere of the recipients with no direct and immediate economic effect for the recipient;
4. measures extending the legal sphere of the recipients with direct and immediate economic effect for the recipient.

In the reality of the LAG Eloro - Mixed Consortium Company with limited liability processes are found abstractly exposed to corruption risk in the risk areas sub 1, 2 and 4. The area marked with number 3 is not part of the Company's risk mapping as it relates to types of activities unrelated to the company organisation. For each risk area, the potentially risky processes and the correlative prevention measures are illustrated below. Both the mapping of risks and the identification of processes at risk and preventive actions are subject to continuous monitoring in view of future adaptations and implementations.

11.General preventive measures

In accordance with the provisions of Law N. 190/2012 and specified in the context of the A.N.P. in general, the LAG Eloro - Mixed Consortium Company with limited liability first of all, it guarantees the implementation of the provisions of art. 1, paragraph 59 of Law n. 190/2012 on reporting by the employee of illegal conduct of which he has become aware. In compliance with the provisions of Legislative Decree n. 39/2013 also undertakes to ensure the application of the provisions on incompatibility and non-transferability of assignments.

The GAL Eloro - Mixed Consortium Company with limited liability, moreover:

- initiates actions aimed at ensuring the acknowledgement of these measures by both the new recruits and those already in service and also integrates the same measures with subsequent provisions to ensure compliance with transparency and integrity;
- prepares initiatives aimed at training staff in the areas at highest risk, ensuring maximum emphasis on training as a crucial moment for the development and implementation of preventive measures;

- adopts rotation systems for personnel assigned to areas at risk.

RISKS, SENSITIVE PROCESSES AND PREVENTIVE MEASURES

Here below there are the risk areas mapped within the company organisation and the correlative processes at risk of corruption.

LIST OF PROCESSES	
RISK AREAS	PROCESSES
Area: Personnel acquisition and management	Recruitment
	Career advancement
	Conferral of collaboration assignments
Area: Assignment of Works, Services and Supplies	Definition of the subject of the assignment
	Identification of the instrument / institution for the assignment
	Qualification requirements
	Adjudication requirements
	Evaluation of offers
	Verification of any anomaly of the offers
	Negotiated procedures
	Direct assignments
	Call revocation
	Drafting of the time schedule
	Variations in the execution of the contract
	Subcontracting
	Use of alternative dispute resolution remedies to jurisdictional ones during the contract execution phase
Area: Extension of the legal sphere of recipients with direct economic effect	Adoption of criteria for selecting beneficiaries
	Call revocation
	Evaluation of the proposals submitted by the beneficiaries

AREA 1

The table below shows the risks nested in each process of the area relating to the acquisition and management of personnel.

CATALOGUE OF RISKS FOR EVERY PROCESS		
RISK AREAS	PROCESSES	RISKS
Personnel acquisition and management	1) Recruitment	Forecasting of "customised" access requirements and criteria. Inadequacy of objective and transparency mechanisms suitable for verifying the possession of the aptitude and professional requisites required in relation to the position to be filled in order to recruit and hire particular candidates.
		Excessive use and abuse in the activation of stabilization processes, aimed at recruiting particular candidates. Non-compliance with the procedural rules to ensure the transparency and impartiality of the selection, in order to recruit particular candidates.
	2) Career advancement	Career and economic progression, illegally granted for the purpose of facilitating certain employees and some specific candidates.
	3) Conferral of collaboration assignments	Tautological and generic reasons regarding the existence of the legal requirements to which the conferment of professional assignments are subject in order to facilitate

		specific subjects.
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Prevention measures

In order to counter the aforementioned risks, the LAG Eoro - Mixed Consortium Company with limited liability adopts the following prevention measures:

1 – 3) Guarantee of adequate publicity, through the institutional website of both the LAG and the RDP Sicily 2014/2020, of the call of comparative selection of new staff to be employed, with the granting of a reasonable period for the submission of applications.

1 – 2 – 3) Appointment of a selection board that will carry out the comparative evaluation of the candidates according to predetermined criteria and in compliance with notes n. 3064 of 11/23/2017 and n. 9266 of 02/22/2017 of the Regional Department of Agriculture.

1 – 3) Advertising the outcome of the selection; advertising on the website the curricula of the subjects participating in the selection (only in the case of conferment of assignments).

AREA 2

The following are the risks attributable to the area Assignment of works, services and supplies.

CATALOGUE OF RISKS FOR EVERY PROCESS		
RISK AREAS	PROCESSES	RISKS
Assignment of works, services	1) Explanation of the subject of	Narrowing of the market in the

and supplies	the assignment	definition of technical specifications, through the identification of criteria and requirements in the technical chapter that favour a given company.
	2) Identification of the assignment procedure	Circumvention of the rules of public evidence, through an improper use of a procedural system for defining direct assignment or negotiated procedure, where it is, on the contrary, necessary to adopt procedures specific to the tender, in order to facilitate a particular subject.
	3) Qualification requirements	Identification of access criteria to tender procedures and, in particular, of the technical-economic requirements of competitors in order to favour a specific company.
	4) Assignment requirements	Intentionally distorted use of the requirement of the most economically advantageous offer, aimed at favouring a particular subject.
	5) Offers evaluation	Failure to comply with the requirements included in the tender regulations which the judging commission must

		comply with in order to define the scores to be assigned to the offer, with particular reference to the evaluation of the project documents.
	6) Verification of any anomaly of the offers	Formal control and analysis of the evidence offered by the competitor to justify the offered discount. Failure to comply with the criteria for identifying and verifying abnormally low offers, also from a procedural point of view.
	7) Negotiated procedures	Adoption of negotiated procedures that fall outside the cases provided for by law in order to favour a particular company.
	8) Direct assignments	Abuse of the institution of direct assignment in cases that go beyond the cases provided for by law in order to favour a company.
	9) Revocation of the announcement	Abuse of the provision of revocation and reopening of the call in order to block a tender whose result is different from that expected or to grant compensation to the successful bidder.
	10) Drafting of the time	Approximation in the planning

	schedule	of the execution times of the works, which imposes certain times on the company for the realisation of the works, with a careful definition and indication of the progress of the works, thus creating the conditions for the request for any extra-earnings in favour of the executor.
		Pressure from the contractor with reference to the direction of the works, remodelling of the time schedule according to the real progress of the work.
	11) Variations in the course of execution of the contract	Admission of variants during the execution of the contract in order to allow the contractor to recover the discount presented in the tender or to achieve extra earnings.
	12) Subcontracting	Collusive agreements between competitors participating in a tender aimed at manipulating the results, through the use of subcontracting mechanisms as a way to distribute the benefits of the agreement to all participants.
	13) Use of alternative dispute resolution remedies to jurisdictional ones during the	Influences in the decisions taken in reference to the outcome of

	contract execution phase	the amicable agreement procedures, deriving from the presence of the private party within the commission.
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Prevention measures

Here below the identified measures aimed at preventing corruption phenomena indicated in the table:

1) The identification of the subject of the assignment must take place through the preference for requirements and the indication of criteria that are not excessively detailed.

2 – 7 – 8) It is necessary to ensure that the activation of the direct assignment institution and of the negotiated procedures must take place only in the cases provided for by the provisions of the law that ensure compliance with the prohibition of the subdivision of the contract value that have the purpose of circumventing the auction base. The market survey through the acquisition of multiple prize quotation is mandatory.

3) It is necessary to ensure an exhaustive indication of the qualification requirements that are respectful of the principle of proportionality.

4 – 5) It is necessary to ensure the timely and mandatory pre-determination of criteria and sub-criteria for the attribution of scores, as objective as possible, and to ensure effective control over the requirements that led to the attribution of the score, by requesting the production of documentation proving what is declared.

6) It is necessary to ensure the provision of preventive analysis of the items related to the expenditure relating to the tender call, allowing a thorough inspection of the supporting documents performed by the competitor.

9 – 13) It is necessary to obtain legal advice, made by a qualified professional.

10) Drafting and monitoring of a detailed time schedule, for any type of work.

11) Obligatory acquisition of the construction manager the designer report, explaining the legal requirements.

12) Controls during the execution phase are guaranteed, so as to ensure a constant flow of information between the office that authorises the subcontract and the technicians.

AREA 4

Below are the risks linked to the area Expansion of legal sphere of recipients with direct economic effect.

CATALOGUE OF RISKS FOR EVERY PROCESS		
RISK AREAS	PROCESSES	RISKS
Area: Extension of the legal sphere of recipients with direct economic effect	1) Adoption of criteria for selecting beneficiaries	Adoption of the selection criteria aimed at favouring participants based on specific procedures that go beyond those normally provided by CLLD.
		Abuse in the use of non-objective scoring criteria.
	2) Call revocation	Use of the institution of revocation of the call where the results of the same are not in line with the expectations of the subject the subject with regard to whom you configure the corruptive phenomenon.
	3) Evaluation of the proposals submitted by the beneficiaries	Abuse of the discretionary quota present in the calls in order to favour a specific subject.

Prevention measures

- 1) The adoption of the selection criteria, while respecting the participatory strategies of the LAG Elero, intended as the implementing body of the LAP "Elero2020", and what is established in the CLLD context, must provide for the adoption of objective criteria for identifying beneficiaries and that are addressed to the selection of potential beneficiaries belonging to a specific category, but not to a specific subject or to a specific company or enterprise.
- 2) The adoption of discretionary evaluation criteria must be limited to a minimum and only provided for in necessary cases.
- 3) Adoption of mostly objective, measurable and quantifiable selection criteria.

SECTION II

MEASURES TO ENSURE TRANSPARENCY AND INTEGRITY

1. Measures for transparency and integrity

The LAG Eloro - Mixed Consortium Company with limited liability, a private entity equated to public entities, according to the community genesis of part of the resources it manages, is required to fully comply, without any adaptation due to its formal company role, with the provisions of Legislative Decree n. 33/2013 on publicity and transparency of the administrative activity.

After the entry into force of Legislative Decree no. 97/2016, the provision for the adoption of a three-year program has been overcome, providing for the adoption of measures to be integrated with those relating to the prevention of corruption. These measures aim to make knowable, participatory and usable all the measures adopted by the LAG Eloro - Mixed Consortium Company with limited liability, in accordance with the principles of social control and civic access, with the aim of determining an appropriate guarantee for an appropriate and correct level of transparency as a constitutive element of the requests for social and collective development, and for the promotion of the culture of legality and integrity.

The measures contemplated within this Programme are aimed at fulfilling the obligations prescribed by Legislative Decree n. 33/2013, as reformed by Legislative Decree n. 97/2016.

These measures represent an essential document for planning activities related to the prevention of corruption and the development of a culture of legality.

For all that is not subject to express provision remains the obligation to respect and adapt to the provisions contained in Legislative Decree n. 33/2013 to which reference should be made.

2. Purpose of the measures

The fundamental objective of the measures to guarantee transparency are aimed at ensuring maximum publicity and transparency, through the publication in the "Transparent area" section of the institutional website of the LAG www.galeloro.org, of the data required by Legislative Decree n. 33/2013.

A further purpose is to expand the flow of information within the LAG structure, favouring consultation and comparison between the interested parties, implementing reconnaissance activities of the databases and applications in use with the aim of identifying other possibilities of automatic creation of the required material, tending to a progressive reduction of costs; encourage the development of an automatic detection system of the level of user satisfaction with the aim of identifying the information needs of stakeholders, both internal and external to the LAG; organise days of transparency provided for by the law; improve the overall quality of the company website, with particular reference to accessibility and usability requirements.

3. Publication and updating of transparency measures

The measures for transparency are published on the institutional website of the LAG Eoro - Mixed Consortium Company with limited liability, www.galeloro.org, and will be updated by the deadline of January 31 of each year.

4. Transparency subjects

For the purposes of Legislative Decree n. 33/2013 in the LAG Eoro - Mixed Consortium Company with limited liability, the Corruption Prevention Responsible has also the function of Transparency Responsible and therefore:

- a) draws up, taking into account the proposals of the cadres, the formulation of the measures to be submitted for approval by the Board of Directors;
- b) prepares the changes to be made to this plan and to the measures that make it up by 30/12 of each year, to be submitted to the Board of Directors by 31/01 of the following year;
- c) verifies the effective implementation of the measures;
- d) approves and publishes on the institutional website, the monitoring and any corrective actions prepared in implementation of the provisions of this plan;
- e) prepares the interventions concerning transparency and carries out control activities on the fulfilment of publication obligations, reporting the results of such control.

5. Subject and type of data

The LAG Elero - Mixed Consortium Company with limited liability, pursuant to article 11, paragraph 2, Legislative Decree 33/2013, obligatorily publishes the information, data and documents in the section called "Transparency area" of the institutional website, with a particular reference to "activities of public interest".

All data are entered and updated directly by the relevant structures, under the direct responsibility of the Heads of the Sector concerned. In the publication of data and documents and all materials to the transparency requirements, it must be guaranteed compliance with privacy regulations.

6. Usability and comprehensibility of data

The quality of the publication is handled by the Responsible of Corruption Prevention, who guarantees easy access to information. Specifically, the documents published must be:

- accurate and complete to the extent that they provide the representation of the phenomenon they intend to describe;
- the documents must be published correctly and without omissions;
- the content must be understandable and made explicit in a clear and evident way. It is therefore necessary to avoid fragmentation, that is, the publication of the same types of data in different areas of the site, in such a way as to make access to information difficult;
- information and documents containing them should be promptly updated.

7. Control and monitoring

The Responsible for the Prevention of Corruption and Transparency oversees the correct fulfilment of the transparency obligations. He monitors the implementation of the measures and initiatives related to them, reporting to the Board of Directors all that concerns any delays or non-compliance.

The Responsible highlights and communicates to the Responsible of the Plan Office and to the figures with roles of responsibility, any deficiencies found and to be remedied within 30 days of the report. After this deadline, the report must be forwarded to the BoD. The Responsible for the

Prevention of Corruption and Transparency also has the task of certifying the fulfilment of obligations relating to transparency and integrity.

8. Civic access

Anyone has the right to request documents, information or data held by the LAG Eloro - Mixed Consortium Company with limited liability of which publication has been omitted, using the telephone numbers and certified e-mail address indicated on the company website www.galeloro.org.

The civic access procedure must be completed within thirty days with the issuance of a provision, expressed and motivated by the submission of the request, with the communication to the applicant and any counter-interested parties. The administration promptly transmits, in case of acceptance, to the applicant the data or documents; or, if the request refers to data, information or documents required to be published under this decree, the data, information or documents requested are published on the company website, and the administration notify the applicant of the publication of the same, indicating the relative hyperlink. Refusal, postponement and limitation of access must be motivated with reference to the cases and limits established by article 5-bis of Legislative Decree n. 33/2013.