

## The College of Europe in Natolin Policy on External Funding

This *Policy on External Funding*, adopted on 7 June 2019 by the Executive Board of the College of Europe, with its seat at ul. Nowoursynowska 84, 02-797 Warsaw, Poland, complements the binding *Code of Conduct and Conflict of Interest Guidelines* of the College of Europe in Natolin and stands without prejudice to all other internal regulations of the College of Europe in Natolin.

This Policy relates to funds from external sources, earmarked for funding of Natolin campus' projects and events' other than those covered by the Operating Grant bestowed upon the College of Europe in Natolin by the European Union or projects funded by the EU.

The present Policy binds all the organisational units of the College of Europe in Natolin.

### 1. Key principles

- a) Funding will only be accepted for work that lies in the best interest of the College of Europe in Natolin and which aligns with the mission and objectives of the College of Europe in Natolin, as stated in its Statutes and internal regulations.
- b) Funding will only be accepted if doing so would not conflict, or be perceived to conflict, with the independence and integrity of the faculty, researchers, staff; or research and academic activities in Natolin, or of the College of Europe in Natolin as such, or would not otherwise be in conflict with the statutory mission, objectives and activities of the College of Europe in Natolin.

### 2. Refusal of external funding

- a) The College of Europe in Natolin does not accept external funding if the potential donor (public or private) falls into one or more of the refusal and exclusion categories:
  - i. represents a country included on the EU list of high-risk third countries that present strategic deficiencies in their regime on anti-money laundering and counter terrorist financing (AML/CTF);
  - ii. is covered by sanctions imposed by the EU or the United Nations or has documented ties to an entity covered by the above sanctions;
  - iii. violates sanctions approved by the EU or the United Nations Security Council or has documented ties to an entity violating the above sanctions;

- iv. is in breach of Polish legislation in force or if the proposed funding or any of its terms would require action that is unlawful in Poland.
- b) Furthermore, the College of Europe in Natolin does not accept external funding if:
- i. there exists published or other credible evidence that the funding sources arise in whole or in part from an activity which involved tax evasion or fraud, or violated international human rights conventions;
  - ii. the proposed funding would create conflict of interest;
  - iii. the proposed funding would expose the College of Europe in Natolin to adverse publicity or reputational risk.

### **3. Procedure for acceptance and implementation of external funding**

- a) The College of Europe in Natolin implements externally financed activities and projects based on legally binding agreements and contracts, and in accordance with their provisions.
- b) While taking into account internal requirements of the donor entity, the College of Europe in Natolin disburses external funds in accordance with relevant EU regulations and the Polish legislation in force, as well as its internal rules and regulations regarding procurement, financial and accounting policy, and financial control.
- c) For each external financing the College of Europe in Natolin will agree with the donor the necessary reporting requirements, including financial reporting.
- d) The College of Europe in Natolin respects the provisions of the General Data Protection Regulation 2016/679.
- e) Each department and unit will consult the Director of Finance, Development and Administration prior to engaging in discussions with a potential donor or funding partner. Due diligence will be carried out to ensure that the given external entity does not fall into funding refusal and exclusion categories listed in point 2 above. The Director of Finance, Development and Administration will be provided with the relevant Due Diligence Note covering each of the new potential donors and partners (prepared on the template attached).
- f) The Director of Finance, Development and Administration will consult proposals for external funding with heads of departments and services of the College of Europe in Natolin, as appropriate.
- g) The Due Diligence Note will include any available information as to the standing of the entity vis-à-vis the funding refusal and exclusion categories listed in point 2 above, as well as any other additional information in support of acceptance of funding by the given entity.

- h) Due Diligence Notes are not required in case of funding by governments and public entities of EU and EEA Member States, nor are they required for international organisations based in or created in cooperation with the EU, the EEA and organisations of the United Nations system.
- i) Potential private sector donors and partners should be examined as to their profile and record in view of the funding refusal and exclusion categories listed in point 2 above.
- j) Decisions regarding the acceptance of external funding rest with the Director of Finance, Development and Administration of the College of Europe in Natolin, who – in the case of funding exceeding the amount of EUR 200.000,00 – seeks consent of the Executive Board of the College of Europe in Natolin in accordance with the statute.

#### **4. Entry into force**

The present policy enters into force on 8 July 2019.