



Triennial Anti-Corruption and Transparency Plan

– PROCESSES AT RISK OF CORRUPTION –

Forum of the Adriatic and Ionian Chambers of Commerce
at Marche Chamber of Commerce

Largo XXIV Maggio, 1
60123 Ancona – ITALY
www.forumaic.org

segreteria.forum@marche.camcom.it
tel. +39 071 5898249/202
m. +39 389-9156172

Fiscal Code: 93096320424
C.U: M5UXCR1
Italian legal email/PEC: forum.aic@pec.it

Premise

In coherence with the provisions of Law 190/2012 and the ANAC Guidelines (Resolution no. 177 of 19/2/2020), the Forum of the Chambers of Commerce of the Adriatic and Ionian has carried out a preliminary risk analysis, taking into account the statute, the organizational chart, the functions performed, the organizational specificity, and the performance of the entity from its establishment to the present day.

The Forum is an international cooperation body that brings together the Chambers of Commerce of the countries in the Adriatic-Ionian area, with the objective of promoting economic development, institutional collaboration, and the strengthening of entrepreneurial relations among the territories involved. The Forum's activities are oriented towards the realization of project initiatives, participation in European programs, and the creation of partnership networks between public bodies, businesses, and academic institutions.

The Forum's organizational structure is divided into the following bodies:

- **Steering Committee (SC):** defines the strategic guidelines and approves the main operational and programmatic decisions.
- **Board of Auditors:** exercises the functions of administrative-accounting control and verification.
- **Forum Secretariat:** carries out coordination activities, operational support, administrative management, and implementation of the initiatives approved by the Steering Committee. The Secretariat is responsible for managing current activities, administrative procedures, and the correct application of prevention and transparency measures.

Regarding the provision of funding, it is specified that **the Forum, as a rule, does not provide contributions or subsidies to third parties**, except in cases where this is foreseen by **specific funded projects** or by particular initiatives approved by the competent bodies. This circumstance significantly reduces the Entity's exposure to corruption risks associated with the management of economic contributions.

The risk analysis carried out is part of the **PTPCT – Triennial Anti-Corruption and Transparency Plan 2024–2026**, a programmatic tool provided for by anti-corruption legislation, aimed at identifying and mitigating corruption risks and ensuring the transparency of administrative activity.

The overall analysis revealed a **low/medium** risk level, never high, referring to some business processes identified as most sensitive in relation to the nature and functions of the Forum.

Are di Rischio

Scope	Sub-processes/Phases	Processes by risk areas	Risk Level
1) Personnel and organisation management	Staff acquisition	Recruitment under permanent and fixed-term contracts	Medium
		Awarding of collaboration assignments	Medium
		Temporary agency work contracts	Medium
	Organisational development (personnel development)	Economic career progressions	Low
2) Purchases and contracts	Procurement of goods and services	Planning and needs assessment	Medium
		Procurement strategy design	Medium
		Contractor selection	Medium
		Verification of award and contract signing	Medium
		Contract execution	Medium
		Contract reporting and financial reconciliation	Low
3) Implementation of development initiatives and projects	Support and advisory services	Granting of contributions arising from funded projects, memoranda of understanding or cooperation agreements	Low
		Disbursement of financial support for initiatives, training	Low

		courses and conferences	
4) Accounting and finance	Accounting	Recording of revenues and expenditures	Medium
	Finance	Collection of membership fees	Low
5) Management and support for bodies	Institutional relations	Awarding of assignments to external experts	Medium
		Identification and appointment of members of bodies, committees and commissions	Low

General measures adopted for the prevention of corruption

PROGRAMMING AND MONITORING OF GENERAL MEASURES (See PNA 2019 §§ 5.1. and 5.2.)				
GENERAL PROVISIONS	IMPLEMENTATION PHASES AND TIMING	IMPLEMENTATION INDICATORS	RESPONSIBLE SUBJECT	MONITORING OVER THREE-YEAR PERIOD
Code of conduct	Adoption/Update of the Code of Conduct in light of d.P.R. no. 62/2013 and A.N.AC. Guidelines.	Approval of the Code of Conduct	SG	annually
	Report to the steering body and the administrative head regarding any violations of the code detected and/or reported	No. of violations detected and/or reported		annually
	Delivery of a copy of the Code of Conduct to newly hired personnel	No. of personnel to whom a copy of the Code was delivered/total newly hired personnel		annually
Social Media Policy	Adoption/update of the Social Media Policy in coherence with the Code of Conduct.	Approval of the Social Media Policy	SG	annually
	Dissemination of the Policy to personnel and	No. of people trained/informed about the document		annually

	collaborators involved in institutional communication.			
	Annual report to the steering body and the administrative head regarding any violations or reports related to the use of social media.	No. of violations/critical issues detected or reported		annually
Extra-institutional assignments	Publication of assignments on the institutional website	Publication	SG	annually
Conflicts of interest	Acquisition and verification of declarations of absence of conflicts of interest made by newly hired personnel or personnel assigned to a new position, or issued by consultants and collaborators	Number of declarations verified out of the number of newly hired personnel and assigned to a new position	SG	annually
Training	Conducting training courses	Refresher course held	SG	annually
Whistleblowing	Acquisition and handling of reports	No. of reports received out of no. of reports handled	SG	annually
Ineligibility/ Incompatibility (SG)	Acquisition of declarations on the non-existence of ineligibility situations	No. of declarations acquired/out of the total number of managerial functions attributed	SG	annually
	Acquisition of declarations on the non-existence of incompatibility situations	No. of declarations acquired/out of the total number of subjects with managerial functions		annually
Tender and competition commissions	Acquisition of a declaration certifying the non-existence of the conditions indicated by art. 35 bis of Legislative Decree No. 165/2001 at the time of conferring the assignment	Number of declarations verified/number of assignments conferred subject to art. 35 bis of Legislative Decree No. 165/2001	SG	annually
Monitoring of procedural times	Measurement of the actual completion times of administrative procedures with the greatest impact (selections and assignment of positions)	Measurement/Publication of the actual completion times of the procedures	SG	annually

Transparency

General Provisions	General Acts	<ul style="list-style-type: none"> • Statute • Financial regulation
Organization	Board of Directors	<i>list</i>
	Board of Auditors	<i>list</i>
	Organizational chart	<i>pdf file</i>
	Legal headquarters	<i>current</i>
	Telephone and Email	<i>current</i>
Consultants and Collaborators	Holders of collaboration or consultancy assignments	<i>on an annual basis</i>
Personnel	Holders of managerial assignments	<i>on an annual basis</i>
	Staffing levels	<i>on an annual basis</i>
	Competition announcements	<i>last 5 years</i>
Budgets	Provisional budget	<i>last 5 years</i>
	Final balance	<i>last 5 years</i>