

Anca Păduraru

From: Assya Kavrakova <assya.kavrakova@ecas.org>
Sent: Tuesday, 9 June 2026 15:43
To: Anca Păduraru
Subject: Re: (!) Formal right-of-reply request | EU Money Monitor investigative publication | ECAS | deadline Monday 8 June 2026 at 17:00 CET

Dear Ms Păduraru,

Thank you very much for your explanation!

The accounts' format does not allow a breakdown by type of expenses indeed.

Regardless ECAS's employees, below is a summary table:

Year	Number of Employees on December 31		overall
	Belgian employees	BG employees	
2015	12	-	12
2016	8	-	8
2017	9	-	9
2018	10	-	10
2019	10	-	10
2020	11	-	11
2021	7	-	7
2022	9	4	13
2023	11	2	13
2024	13	3	16
2025	14	3	17

Best wishes,

Assya Kavrakova

Executive Director,
European Citizen Action Service (ECAS)



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On Mon, Jun 8, 2026 at 6:33 PM Anca Păduraru <anca@money-monitor.eu> wrote:

Dear Ms Kavrakova,

Thank you for your response! I am aware the timeframe was short, shorter than is ideal for questions spanning a decade, and I appreciate that you replied substantively and on the specifics. Your clarifications are material and will be reflected accurately in the article.

On the figure you asked about: it is drawn from the EU Financial Transparency System, the field "Beneficiary's contracted amount (EUR)", recorded in ECAS's name across all actions in budget years. The export totals €27,936,445 - the amount contracted in ECAS's name as beneficiary, not consortium-wide commitments. I attach the extract; it can be reproduced by searching the FTS for "European Citizen Action Service" and opening the Project details on the top-right button within the search section. This is the disclosure the European Commission itself publishes.

You note that ECAS's Belgian-based staff are registered with the ONSS and its Bulgarian-based staff with the NAP. So that the public record reflects the full workforce and not the Belgian figure alone, could you confirm how many persons were registered under each across the period? Any figure you provide will be reflected.

I want to be precise about what the article will say concerning ECAS, because it differs from the others. The article does not challenge ECAS's statement that its accounts are independently prepared and audited and that its financial procedures are subject to board, AGM and Audit & Risk Committee oversight. These points will be reflected accurately. Its standard is narrower and different: whether a citizen who funds this work can, from the public record alone, verify and understand how the money was used and by whom.

On that test, ECAS's filed accounts make its declared workforce visible. ECAS reports personnel costs of €838,141 for an average of 11.3 full-time equivalents in 2024, compared with €739,421 and 9.6 FTE in 2023. The social balance provides information on headcount, contract type and hours worked. A citizen can see that ECAS employs people, how many are declared and the aggregate personnel cost. That is to ECAS's credit, and the article will say so.

The one point the public record does not resolve is the following. In the abbreviated format ECAS files, goods and services are reported on a single combined line, codes 60/61, which totals €1,628,133 for 2024

- more than declared payroll. The format does not break that line down, so a citizen cannot see, within it, how much relates to external project services or experts as distinct from rent, professional services, administration and other operating costs. That is the only verifiability question the article raises about ECAS, and it is the precise breakdown - directly employed personnel, consultants, project services, administration, other operating costs - that your own reply set out. Identifying a remedy is not the article's purpose; documenting what the public record does and does not show is.

The article is scheduled for publication on Wednesday 10 June 2026. Your response is reflected, and any further clarification you send before then will be reflected as well. Anything received afterwards will be addressed in subsequent coverage.

Thank you again for the openness of your reply.

My best,

Anca Păduraru

Founder, **EU Money Monitor**

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Brussels, Belgium

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From: Assya Kavrakova <assya.kavrakova@ecas.org>

Sent: Monday, 8 June 2026 16:30

To: Anca Păduraru <anca@money-monitor.eu>

Subject: Re: (!) Formal right-of-reply request | EU Money Monitor investigative publication | ECAS | deadline Monday 8 June 2026 at 17:00 CET

Dear Ms Păduraru,

I refer to your email "Formal right-of-reply request | EU Money Monitor investigative publication | ECAS | deadline Monday 8 June 2026 at 17:00 CET", which I received after working hours on Friday, June 5, 2026.

Our understanding of good practice in journalism is that generally, 48 to 72 hours is considered a baseline for responses to straightforward inquiries while issues requiring research would have a considerably longer timescale. You have set a timeline of just 7 working hours, which is very demanding for a small organisation such as ECAS which always has advance demands on personnel time. However I will endeavour to respond to your questions.

The central thrust of your inquiry relates to the ECAS level of financial transparency and, in particular, the extent to which access via public records provides adequate information on the breakdown between directly employed personnel, consultants, project services, administration or other operating costs.

The only official mechanism available to ECAS for the publication of its financial records is registration of our annual accounts with the National Bank, which as you know, are then available for public scrutiny. We would be interested in exploring any other method you might suggest.

The format of the annual report is determined by Belgian law and the way in which expenses and income are reported must follow this format. (This format meets international accounting standards.)

The ECAS accounts are prepared by an independent, registered accounting company. The accounts are audited by an independent, registered auditor and, when approved by the ECAS board are circulated to ECAS governing members and approved at the AGM. In addition, the ECAS Audit & Risk subcommittee monitors the internal financial procedures.

Moreover, grants from the EU carry very specific conditions especially in terms of financial reporting and the format in which reports are prepared. And, of course, they are subject to external audit.

ECAS is also registered in the Transparency Register where it updates its information regularly.

Regarding employee numbers – the Belgian based employees are registered with ONSS and the Bulgarian employees are registered with NAP.

We are unable to identify the figure of 27.4M Euro in EU grants. Can you please forward details?

ECAS maintains its financial record in full compliance with the requirements of the Belgian law and with its statutory requirements as envisaged in its Articles of Association. Moreover, our understanding of transparency and accountability is not confined to finance but includes delivery of our mission both in qualitative and quantitative terms. All our activities and their sources of funding are listed on our website. This includes detailed annual activity reports and work programmes. This is the standard ECAS abides by and advocates for others – not more, not less.

Best regards,

Assya Kavrakova

Executive Director,
European Citizen Action Service (ECAS)



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On Fri, Jun 5, 2026 at 6:59 PM Anca Păduraru <anca@money-monitor.eu> wrote:

Dear Ms. Kavrakova,

EU Money Monitor is publishing an investigative article on the transparency of EU funding to Belgian non-governmental organisations and the oversight architecture of the European Anti-Fraud Office. The article references figures and documented facts concerning ECAS drawn exclusively from official public registries and ECAS's own published materials. **This email constitutes a formal right-of-reply request** under standard journalistic ethics and the public interest principles that govern investigative reporting.

ECAS's mission, as published on its own website and in the EU Transparency Register, is to campaign for "*an inclusive, transparent and democratic Europe*" and to empower citizens to exercise their rights. EU Money Monitor applies that stated standard to the public registry record of ECAS's own EU funding and workforce structure. Article 317 TFEU requires the EU budget to be implemented in accordance with sound financial management, while the EU Financial Regulation requires internal control, recipient-level control, reliable reporting, audit trails and traceability in the implementation of EU expenditure. EU citizens who fund ECAS's work are entitled to ask whether the public record allows them to verify how those funds are managed, by whom, and through what workforce structure.

The article will publish the following figures. These figures are drawn from ECAS's own filings, public registry entries and published materials.

- From the FTS today, 2015–2024: €27,936,445 beneficiary contracted amount recorded in ECAS's name across all actions. Parallel grants per year: 7 to 20.
- From NBB annual accounts: payroll represents 40% and services and miscellaneous expenditure (code 61) represents 60% of combined HR-related expenditure across all reported years.
- FY2023 (NBB): personnel costs €739,421 for 9.6 FTE; services and miscellaneous €1,699,704 - more than double personnel costs, and over half of all operating expenses.

- FY2024 FTS contracted EU funding: €4,085,556 across up to 20 parallel grants.
- From the ONSS employer registry: ECAS is registered in the 5–9 employee band in Belgium.
- From ECAS's own website: 16 staff listed in December 2025, 14 staff today.
- Assya Kavrakova: Executive Director since 2013, 13+ years. Source: NBB filings and Belgian Official Gazette.

The article observes that an organisation whose declared mission is promoting transparency and empowering EU citizens, and which has managed over €27.4 million in EU grants across a decade, classifies 60% of its HR-related expenditure under a budget code that does not allow any citizen, journalist, or public-interest researcher to identify from the public record which part relates to external workforce, consultants, project services, administration, or other operating costs. This is a public-verifiability question.

The article asks: does ECAS's own public financial record reflect the transparency standard ECAS advocates for others? These are questions arising from the public record. ECAS's response will be published.

If any figure above is factually inaccurate, identify the specific error and provide supporting documentary evidence by Monday 8 June 2026 at 17:00 CET.

Sound financial management is written into the EU Treaty. Transparency, control and auditability are built into the EU budget framework. Public money must leave a public record.

The article's questions are limited to what the public record shows, what it does not show, and what that gap means for citizens seeking to verify how public money is managed.

Kind regards,

Anca Păduraru

Founder, **EU Money Monitor**

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Anca Păduraru

From: Fabio Bargiacchi <Fabio.Bargiacchi@eces.eu>
Sent: Thursday, 11 June 2026 00:23
To: Anca Păduraru; Monica Frassoni
Cc: ECES - Info; Cathy Lespiaucq; Océane Magotteaux - Andersen; Luca Roscini
Subject: Re: (!) Formal right-of-reply request | EU Money Monitor investigative publication | ECES | deadline Monday 8 June 2026 at 17.00 CET

Dear Ms. Păduraru,

Thank you for your email. I am writing further to your correspondence of 5 and 7 June 2026 and phone conversation of today.

At the outset, we would like to thank you for the professional exchanges held thus far. Following your correspondence, we also took the opportunity to review in detail the information publicly available on the EU Money Monitor website, including the description of your methodology, analytical approach, intelligence services and case studies. This review was useful in helping us better understand the broader objectives of your work and the analytical framework within which ECES was selected for detailed profiling among the 758 organisations referenced in your research.

We understand that your stated objective is not to assess the legality or regularity of expenditure by specific organisations, but rather to examine questions of transparency, traceability and public visibility in relation to the use of European public funds. We further note and appreciate your clarification that your article does not allege fraud, illegality, ineligible expenditure, misappropriation of funds or non-compliance by ECES with donor, contractual, audit or legal requirements.

Having carefully reviewed your correspondence, we understand that the central question you seek to address is not whether ECES complies with applicable financial, contractual and audit requirements, but rather how an organisation that has managed substantial volumes of EU-funded projects can appear in Belgian public records as having a limited permanent employment footprint. We believe that this question can only be properly understood through an accurate understanding of the nature, purpose and operational model of ECES.

ECES was established in 2010 as an independent, neutral and private not-for-profit foundation specialised in electoral assistance, democracy support, mediation and governance support. From its inception, ECES was not conceived as a traditional Brussels-based NGO organised around a large permanent headquarters workforce. Nor was it established as a public utility foundation benefiting from structural operating grants intended to finance extensive headquarters functions. Instead, ECES was specifically created to facilitate electoral cooperation between the European Union, EU Member States and partner countries through the implementation of electoral assistance and democracy-support activities, overwhelmingly outside Belgium and outside the European Union.

The overwhelming majority of ECES-funded activities have therefore been implemented in partner countries across Africa, the Middle East, Latin America, Asia and other regions where electoral assistance, governance support and mediation activities are requested by beneficiaries and financed by donors. Consequently, ECES is fundamentally a field-oriented implementation organisation rather than a headquarters-oriented organisation. This distinction is central to understanding the observations made in your analysis.

From the outset, ECES deliberately chose not to build a large permanent headquarters workforce. Instead, it adopted a project-based implementation model relying on the mobilisation of specialised expertise according to project requirements, beneficiary needs, technical competencies, language requirements and operational realities. This model has remained substantially unchanged since 2010. The rationale is straightforward: to maximise the proportion of resources dedicated directly to

beneficiaries, electoral stakeholders, technical assistance, mediation, capacity development and operational activities while limiting fixed structural costs and preserving flexibility, independence and sustainability.

The Financial Transparency System data attached to your correspondence confirms this reality. The projects listed are overwhelmingly implemented outside Belgium and outside the European Union, notably in countries across Africa, the Middle East, Latin America and Asia.

In our view, the FTS data therefore reinforces rather than contradicts the operational model described above. The geographical scope and nature of these activities help explain why ECES mobilises expertise where activities are implemented rather than maintaining a large permanent headquarters workforce in Brussels. However, following our review of the ECES profile currently published on the EU Money Monitor platform, we are concerned that certain conclusions appear to result from methodological assumptions that may not accurately reflect this operational reality. In particular, the profile appears to infer the scale of ECES' workforce and operational capacity primarily from Belgian payroll data, ONSS classifications, NBB accounting categories and selected profiles displayed on the ECES website.

With respect, such an approach risks conflating fundamentally different categories of individuals and contractual relationships. The consultants, experts, governance members and collaborators displayed on the ECES website do not constitute, and have never been presented as constituting, an exhaustive list of all individuals mobilised by ECES activities worldwide.

Consequently, Belgian payroll figures, ONSS classifications and selected website profiles cannot reasonably be treated as proxies for ECES' total operational workforce. We therefore respectfully request that the ECES profile currently published on the EU Money Monitor platform be corrected or updated to reflect this distinction and to avoid creating the misleading impression that the persons visible on the ECES website represent the entirety of the workforce mobilised by ECES.

Here our Responses to the Four Questions Raised

1. Parallel Grants and Time Declarations

ECES confirms that experts, consultants and service providers engaged under project-based arrangements are required to provide supporting documentation corresponding to the services delivered and costs charged to the relevant projects. Depending on the nature of the assignment, such documentation may include timesheets, mission reports, activity reports, deliverables, invoices, contractual documentation and approval records. ECES maintains internal procedures and control mechanisms designed to ensure that costs are correctly allocated to the relevant project and that the same cost or working day cannot be charged simultaneously to multiple projects. The objective of these procedures is to ensure that costs remain traceable, attributable, documented and auditable.

We note, however, that the concept of an organisation-wide consolidation of all consultancy days across all projects is not generally a requirement under the contractual frameworks governing consultancy-based assignments and does not necessarily constitute a meaningful management indicator for an international implementation organisation operating simultaneously across multiple countries and projects. What is essential is that each cost remains attributable, documented, auditable and linked to the project under which it is charged. ECES procedures are specifically designed to ensure that result.

2. Scope of Audits and Controls

The controls referred to in our previous correspondence covered projects implemented in countries including Ethiopia, Nigeria and South Africa. As is normal for expenditure verifications, donor audits and project controls, the scope varied according to the project, contract and audit framework concerned. None of these controls identified fraud, significant ineligible expenditure or systemic weaknesses in ECES' internal control environment. We are not aware of any of these controls having been designed to produce an organisation-wide consolidation of consultancy days invoiced by any individual across ECES' entire project portfolio. Rather, the purpose of such controls was to verify legality, regularity, eligibility, documentation, traceability and compliance under the projects concerned. Those objectives were successfully met.

3. Employment Contracts and Governance-Related Arrangements

Since its establishment, ECES has operated primarily through a project-based implementation model relying on the mobilisation of external experts, consultants, collaborators and service providers engaged under a variety of contractual arrangements tailored to the specific requirements of individual projects. Consequently, payroll data alone does not provide a complete or accurate picture of the human and technical resources mobilised for the implementation of ECES activities across multiple countries and programmes.

As regards ECES governance structures, membership of the Board of Directors, Strategic Advisory Committee or other governance bodies does not, in itself, give rise to remuneration. Individuals serving within ECES governance and advisory structures are selected on the basis of their recognised expertise and extensive professional experience in fields such as electoral assistance, democratic governance, diplomacy, mediation, public administration, international development and cooperation.

Where justified by operational needs, technical requirements, donor-funded activities or the specific expertise required for a project, certain individuals serving in governance or advisory capacities may also be engaged under separate and distinct professional arrangements to provide operational, technical or managerial services within projects implemented outside the EU member states mainly. Any remuneration associated with such assignments relates exclusively to services actually rendered, deliverables produced and responsibilities performed under the relevant contractual framework, and not to their governance or advisory functions.

Such arrangements are subject to contractual obligations, conflict-of-interest safeguards, internal approval procedures, donor regulations, timesheet and reporting requirements, financial controls and auditability standards applicable to all experts mobilised by ECES. These mechanisms are regularly reviewed through internal controls, external audits, donor verifications and independent evaluations, ensuring transparency, accountability and compliance with applicable contractual and regulatory requirements. Further information regarding ECES audits, evaluations and accountability mechanisms is available at: <https://www.eces.eu/en/audits-and-evaluations>

4. Institutional Experience and Public Funding Dependence

We respectfully submit that the concept of "institutional proximity" appears to involve an analytical interpretation rather than a verifiable factual indicator. ECES was established precisely by electoral-assistance and democracy-support practitioners because its founders, advisers and collaborators possessed extensive experience in electoral assistance, democratic governance, diplomacy and international cooperation. Experience acquired within European institutions, the United Nations, the OSCE and other international organisations constitutes a professional qualification and source of technical expertise rather than evidence of institutional dependence. Likewise, the fact that ECES receives substantial funding from European institutions reflects its mandate, recognised expertise

and track record in electoral assistance and democracy support. It should not be interpreted as evidence of diminished independence. On the contrary, ECES was deliberately established as an independent private foundation bringing together expertise acquired across multiple international institutions, organisations and operational environments worldwide.

Methodological Observations

Finally, given that your article is presented as a comparative analysis of 758 Belgian beneficiaries of EU funding and that ECES is one of only five organisations selected for detailed profiling, we would appreciate clarification regarding the comparator group and methodology applied. In particular, it would be useful to understand whether organisations operating under implementation models comparable to ECES were assessed according to the same criteria and whether similar observations were identified.

For example, it would be useful to know whether organisations active in democracy support, electoral assistance, governance support, mediation and international cooperation were examined under the same methodology. Comparisons between organisations operating under fundamentally different mandates, legal structures, geographical scopes, staffing approaches and funding models may produce conclusions that do not accurately reflect operational realities.

Transparency is best served when comparable organisations are assessed against comparable indicators. We would therefore welcome clarification regarding whether organisations operating through project-based expert mobilisation mechanisms similar to those of ECES were included within the comparator group and whether similar observations were reached. We trust that the information set out in this response will be taken into account in the preparation of your article and in any assessment of ECES' workforce structure, operational model and implementation reality.

We trust that the above responses fully address the questions raised in your correspondence and we look forward to receiving your feedback.

Yours sincerely,

Fabio Bargiacchi

Founder & Executive Director

European Centre for Electoral Support

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From: Anca Păduraru <anca@money-monitor.eu>

Date: Sunday, 7 June 2026 at 10:27

To: Fabio Bargiacchi <Fabio.Bargiacchi@eces.eu>; Monica Frassoni <Monica.Frassoni@eces.eu>

Cc: ECES - Info <EcesInfo@eces.eu>; Cathy Lespiaucq <cathy.lespiaucq@pme-conseils.be>;

Océane Magotteaux - Andersen <oceane.magotteaux@be.andersen.com>; Luca Roscini

<luca.roscini@be.andersen.com>

Subject: RE: (!) Formal right-of-reply request | EU Money Monitor investigative publication | ECES | deadline Monday 8 June 2026 at 17.00 CET

Dear Mr. Bargiacchi,

Thank you for your written response yesterday and for the phone conversation on Friday 5 June.

One factual correction. Your email states I confirmed ECES would receive the right of reply before any publication. What I said was that ECES could have more time and that your response would be reflected in the article's coverage. Publication is not conditional on receiving your response. The article was scheduled for publication on Tuesday 9 June 2026. Because ECES engaged promptly and in good faith, by telephone on 5 June and in writing last night, and has asked for additional time to consult its financial and legal advisers, I can extend the deadline by one day. Any response received by Wednesday 10 June 2026 at 11:00 CEST will be reflected within the published article that now publishes on Wednesday 10 June 2026 at 13:00 CEST. If you still do not find the new deadline sufficient, your fuller written response, committed for Friday 12 June 2026 at 17:00 CEST, will be addressed in subsequent coverage on the following Monday.

Attached is the FTS export for ECES (BE0829998514), 2014–2024, downloaded directly from the EU Financial Transparency System this morning. The figure of €77,979,531 is the sum of the FTS field "*Beneficiary's contracted amount (EUR)*" across 34 recorded actions, the amount contracted in ECES's name as beneficiary, not total project commitments, and not consortium-wide amounts. The ECES annual accounts are publicly accessible at the NBB Central Balance Sheet Office under BE0829998514. I am providing the underlying public-source data and will not share unpublished drafts or internal working files before publication.

On the article's scope and why ECES is in it.

The article documents a structural pattern across 758 verified Belgian NGO and non-profit EU grant beneficiaries, cross-referenced across four public registries, FTS, CBE, ONSS, and NBB, covering a €7.89 billion funding universe in EU grants over a decade, of which 92.41% was verified at entity level against public registries.

The European Court of Auditors published Special Report 11/2025 in April 2025, concluding that obtaining reliable information on all EU funds received by NGOs is "practically impossible" (paragraph 39); that there is no reliable overview at EU level (paragraph 11); that checks on financial dependency and funding sources "were not carried out" (paragraph 14); and that more than 90%, over 70,000, of EU entities to which payments were made were never categorised as NGO or non-NGO in the Commission's own accounting system, as the field was left blank (paragraph 22). The ECA also documented in that report that seven organisations in its own audit sample "had no permanent staff, as they only hired staff to carry out projects for which funding had been received" (paragraph 60), but did not examine what those arrangements cost or who received the money, because SR 11/2025 was a transparency audit, not a regularity audit. In its formal written reply to EU Money Monitor, the ECA confirmed that SR 11/2025 "*was not designed to verify the regularity and legality of EU funding spent by NGOs*" and that its work "*did not include verification of personnel cost declarations.*" On cross-portfolio personnel costs, the ECA stated that it audits such declarations "occasionally" when selected transactions form part of its statement-of-assurance sample, and that "*the objective of these examinations is not to express an opinion on the revenue and/or spending of one or more specific beneficiaries.*"

For this article, five organisations were selected for detailed profiling from the 758 verified entities on four criteria applied uniformly: high EU grant volume contracted in the beneficiary's name; a declared payroll or employer footprint low relative to operational scale; high concentration of expenditure under NBB code 61; and substantial parallel grant portfolios. ECES satisfies all four. €77,979,531 contracted in ECES's name as beneficiary, 2014–2024. ONSS employer band: 1–4. Code 61 represents 98.5% of the combined total of code 61 expenditure and declared payroll across eleven filed annual accounts. Thirteen grants with overlapping recorded start and end

dates active during 2019. These figures come from official public records, including ECES's own NBB filings.

On your letter's central argument.

Your letter confirms that ECES relies on "*consultancy, expert, project, framework or service arrangements*" rather than a traditional large Belgian payroll structure, including for persons contributing to Brussels headquarters functions, and that this is "*a central feature of ECES's operating model.*" It also describes ISO 9001 and TRACE certifications, multiple external controls, and three European Court of Auditors controls involving ECES, with no material findings of ineligible expenditure or systemic weakness. All of these facts will be reflected in the article.

Your letter refers to three ECA controls involving ECES. Separately, the ECA confirmed to EU Money Monitor that SR 11/2025 was a transparency audit, not designed to verify legality and regularity of NGO expenditure, and did not include verification of personnel cost declarations. That general response does not establish the scope of the three controls involving ECES specifically, which is why one of the questions below asks you to identify what each covered, if possible.

Belgian NBB code 61, "services and miscellaneous goods", is a single aggregated accounting line. Across eleven years, €102.9 million is recorded under that line in ECES's filed accounts. No citizen, no journalist, and no public-interest researcher can determine from that line what portion represents invoices from persons managing the organisation, subcontracted field expertise, office costs, or any other category. The ECA documented the no-permanent-staff workforce model in its own audit sample but did not examine the cost or recipient details of those arrangements within SR 11/2025's scope. The Belgium dataset identifies related workforce-visibility patterns across 758 entities. ECES is one of five where the combination of grant volume, parallel portfolio, and code 61 concentration makes the gap most visible.

For EU officials, basic monthly salary scales are published by grade and step in the Official Journal of the European Union, most recently in C/2025/6564, applicable from 1 July 2025. Grant beneficiaries such as ECES are not subject to an equivalent general obligation to publish the remuneration of senior management or contracted personnel. ECES states that 83% of its total funding comes from the European Union, ECES's own published figure, and that degree of public financial dependence is what makes the public-verifiability question directly relevant.

The article addresses a broader structural question about Brussels NGO leadership and institutional proximity. Organisations registered in the EU Transparency Register on a public interest basis, advising EU institutions, shaping policy in their field, and receiving grants predominantly from public funds occupy a specific position: they claim public interest authority as the basis for their institutional access, derive the majority of their income from that same public source, and are not subject to an equivalent general obligation to publish how that income flows to the people exercising that authority. That combination, public interest authority, predominant public funding, and opaque personal income structures, is the documented tension the article names. It does so for the sector as a whole, not for ECES alone.

Four questions for your response.

First, on parallel grants and time declaration.

You confirmed by phone on 5 June that invoicing inside ECES is project-based. The FTS records 13 grants with overlapping start and end dates active during 2019. For any person with management or governance functions who invoices ECES across multiple simultaneously active grants: do the timesheets submitted per grant record days worked specifically on that project? Does ECES maintain a consolidated record at organisation level of the total days any such person invoiced across its full parallel portfolio in a single year? The ECA's written reply described its

personnel-cost work as transaction-sample based and did not identify any mechanism producing an entity-level, cross-portfolio consolidation at EU level. Your answer will clarify whether ECES maintains one internally.

Second, on the scope of your external controls.

Please identify, for each of the three ECA controls your letter refers to, the year, the audit body or ECA chamber concerned, the expenditure examined, whether personnel or consultancy costs were tested, and whether the control produced an organisation-level consolidation of total days invoiced by any individual across ECES's full parallel grant portfolio in a single year. Expenditure verifications under PRAG are ordinarily conducted against the specific contract or action under examination. The prohibition against financing the same costs twice from the EU budget addresses double-claiming of the same cost, not the aggregate annual engagement of an individual across an organisation's full concurrent portfolio. If none of the three controls produced the consolidated picture described above, that is a factual answer the article will reflect accurately alongside your other audit findings.

Third, on senior management and related-party service arrangements.

Your letter states that *"ECES does not have employees per se."* The ONSS employer registry places ECES in the 1–4 employee band, while ECES's filed annual accounts record payroll and FTE. Please clarify how many persons were employed under Belgian employment contracts in each year from 2014 to 2024 and how this reconciles with your letter's formulation.

Separately: please state whether ECES, or any ECES-managed project, pays fees or invoices to any current member of the Management Board, President, or Executive Director, or to any legal entity owned or controlled by such a person. If such arrangements exist, please identify the governance safeguards that apply, approval by a disinterested body, conflict-of-interest declarations, benchmarking against market rates, disclosure to donors, and audit review, and whether the nature and aggregate annual value of such arrangements are visible in any publicly accessible ECES document. This question does not assume any such arrangement is unlawful. It asks whether arrangements involving persons exercising governance or executive authority over ECES exist, how they are governed, and what the citizen who funded the work can verify.

Fourth, on prior institutional roles and public funding dependence.

Your own public biography, as published on ECES's website, records senior roles within EU institutions and the EC-UNDP Joint Task Force on electoral assistance before ECES was founded. Ms. Monica Frassoni, ECES President since 2013, served as a Member of the European Parliament from 1999 to 2009, including on the Legal Affairs Committee, and as co-President of the European Green Party between 2009-2019. Ms. Monica Frassoni simultaneously holds the presidency of EU-ASE, a board position at European Movement International, and a seat on the Board of Trustees of Friends of Europe. These are documented public facts, sourced to ECES's own governance page and public registries.

The article asks a structural question about the Brussels NGO sector as a whole: when an organisation states that 83% of its funding comes from EU institutions, is led by people with prior senior EU institutional experience and continuing governance roles across Brussels policy organisations, and does not publicly disclose the remuneration or service income received by those exercising executive or governance authority, what does institutional proximity mean for the citizen who funds it, and what does transparency mean in practice beyond what auditors alone can see? I give you the opportunity to address this directly before publication.

Your responses will be reflected in the article's coverage of ECES. Your fuller response committed for 12 June 2026 will be addressed in subsequent coverage.

Kind regards,

Anca Păduraru

Founder, **EU Money Monitor**

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From: Fabio Bargiacchi <Fabio.Bargiacchi@eces.eu>

Sent: Sunday, 7 June 2026 00:13

To: Anca Păduraru <anca@money-monitor.eu>; Monica Frassoni <Monica.Frassoni@eces.eu>

Cc: ECES - Info <EcesInfo@eces.eu>; Cathy Lespiaucq <cathy.lespiaucq@pme-conseils.be>; Océane Magotteaux - Andersen <oceane.magotteaux@be.andersen.com>; Luca Roscini <luca.roscini@be.andersen.com>

Subject: Re: (!) Formal right-of-reply request | EU Money Monitor investigative publication | ECES | deadline Monday 8 June 2026 at 17.00 CET

Dear Ms. Păduraru,

Thank you for your email of 5 June 2026 and for the constructive telephone conversation we had yesterday, which allowed us to better understand the scope and focus of your work that we did not know before and to explain you ECES's operating model, as we had not previously had the opportunity to present it to you.

We must however note, as a matter of fairness and accuracy, that a formal right-of-reply request sent late on a Friday afternoon, covering eleven financial years, several public registries and complex accounting and operational questions, cannot reasonably be expected to receive a response by the following Monday, particularly over a weekend. Despite this very short notice, ECES in any case contacted you immediately by telephone and is now following up in writing, in good faith, to confirm the process and timeframe for a proper response.

As discussed, ECES takes transparency, accurate reporting, quality management, financial accountability, anti-corruption compliance and auditability extremely seriously. These are not only principles stated on our website, but systems that ECES has built, maintained, tested and renewed since 2010.

ECES maintains and renews its **ISO 9001 certification**, which concerns quality management systems, documented procedures, process control, continuous improvement and the capacity of an organisation to deliver services consistently under applicable requirements. In ECES's case, this certification is directly linked to the way we manage complex electoral-assistance and democracy-support projects, including in fragile, conflict-affected and post-conflict environments.

ECES also maintains and renews its **TRACE certification**. TRACE is not a simple reputational label. It is an internationally recognised anti-bribery, compliance and good-governance due-diligence framework. For an organisation such as ECES, working mostly outside the European Union and often in high-risk operational environments, TRACE certification is particularly relevant because it relates to integrity, anti-bribery standards, governance transparency, due diligence and compliance culture.

In addition to these certifications, ECES has been subject over the years to a significant number of external controls, including system audits, financial audits, expenditure verifications, evaluations and donor controls plus the audit of all our activities by an external reviseur de compte to be able to publish our annual account at the National Bank of Belgium. ECES projects and procedures have also been examined on **three separate occasions in the context of European Court of Auditors controls**. These reviews did not call into question ECES's management model, financial integrity or control framework. On the contrary, the audits and verifications to which ECES has been subject have confirmed the robustness of ECES's management systems, financial procedures, documentation standards and internal control environment, with no material findings of ineligible expenditure or systemic weakness.

ECES has also developed and applies its own **Standard Operating Procedures**, which reflect and operationalise the applicable principles of the EU PRAG rules, adapted to the needs of a not-for-profit foundation specialised in electoral assistance and democracy support. These procedures cover the management of experts, consultants, procurement, project expenditure, documentation, reporting, financial control, audit trails and compliance requirements.

We therefore reject any suggestion that ECES's operating model reflects a lack of transparency, lack of control or lack of auditability. ECES's model is extensively documented, externally verified and subject to donor, auditor and institutional scrutiny.

We also appreciate your confirmation over the phone that ECES will be given the opportunity to provide a proper right of reply before any publication and within a reasonable timeframe.

Given the scope of the figures and characterisations referred to in your email, covering eleven financial years and several different public registries, ECES cannot responsibly provide a response within the original deadline. As explained during our call, the issues raised require verification together with our financial-management and legal advisers, including **PME Conseils** and **Andersen Global**, who are supporting ECES in this matter (in copy).

We therefore confirm that ECES will provide a response by **Friday 12 June 2026 at 17:00 Brussels time**. This timeframe is also necessary because several ECES representatives, including me as I told you, are currently travelling to Egypt in the context of the organisation of the African Union Continental Forum on electoral matters, involving electoral management bodies from across the African continent and 55 countries which is operationally and logistically very challenging.

For the avoidance of doubt, this email is an acknowledgement and procedural response only. It should not be treated as ECES's full substantive right of reply at all. ECES will provide its response after completing the necessary work on what you ask and after consulting with PME Conseils and Andersen Global.

Without prejudice to that full response, we would already like to clarify an important point discussed during our call. Some of the apparent discrepancies in the public record appear to arise from comparing registries and accounting categories that do not measure the same thing.

ECES operates through a full project-based model, with activities implemented largely outside the European Union, including in fragile, conflict-affected and post-conflict contexts. Given the volatile, non-permanent and field-based nature of this work, ECES relies on collaborators, experts and consultants engaged through consultancy, framework or service contracts, rather than on a traditional large Belgian payroll structure.

This also applies to persons contributing to ECES's Brussels headquarters functions, where relevant, through framework consultancy arrangements linked to project implementation. These

consultants are remunerated on the basis of days actually worked on projects, under documented contractual arrangements and subject to the applicable verification, audit and reporting requirements from the donors. Where such costs are reimbursable project costs, ECES does not apply a financial margin on them.

This is a central feature of ECES's operating model. Belgian payroll figures, ONSS employee-band data, annual-account code 61, EU Transparency Register FTE figures and ECES's operational/project workforce are not equivalent categories and should not be presented as if they measure the same reality. In particular, persons contributing to ECES activities worldwide and in Brussels through consultancy, expert, project, framework or service arrangements are not obviously reflected as Belgian payroll employees, simply because we do not have employees per se but collaborators and consultants as long as we do have projects.

Over the past sixteen years, ECES has engaged a very significant number of experts, consultants and collaborators — close to **3,000 persons** — under project-based contractual arrangements. These arrangements are documented through contracts, project records, procurement files, expert files, reporting, audits and evaluations, as applicable under donor and legal requirements.

ECES's model is also linked to its institutional independence and neutrality. ECES does not seek unrestricted core funding from political or philanthropic donors for its Brussels headquarters. Its work is mainly financed and implemented through project-based activities, with costs linked to the activities and days actually delivered, mostly outside the European Union, particularly in Africa and the Middle East, as well as in Latin America and Eastern Europe.

This also means that ECES should not be compared mechanically with organisations operating under different institutional, statutory or funding models. Some organisations in the democracy-support and international-cooperation field may benefit from structural funding, institutional host arrangements, donor-funded headquarters functions, public core subsidies or unrestricted philanthropic support that allow them to maintain larger permanent salaried payroll structures.

ECES has chosen a different model, based on project implementation, cost traceability, operational flexibility, neutrality and independence. Any comparison of payroll, staff numbers or operating structures should therefore take into account these fundamental differences in funding model, mandate, legal status and institutional set-up.

ECES also wishes to underline that it proactively publishes extensive information on its website, including resource-mobilisation data, audit information and evaluations. ECES therefore rejects any implication that differences between public registry categories demonstrate irregularity, lack of control or improper use of EU funds. ECES considers itself to be among the most transparent organisations in its field precisely because it makes this information publicly available and subjects its systems to repeated external verification.

To ensure that our response addresses your questions precisely, we would be grateful if you could provide the underlying material used for each figure cited in your email, including:

1. the FTS extraction used, including whether the figures refer to commitments, contracted amounts, payments, coordinator amounts, consortium amounts, or amounts retained by ECES;
2. the NBB annual-account lines and calculations used for code 61 and payroll;
3. the ONSS extract or screenshot used;
4. the Transparency Register capture used;
5. the website captures used for the Brussels-based staff figures;
6. any draft passage or specific allegation to which ECES is being asked to respond.

As also discussed, ECES remains available to organise a Zoom meeting, including with our financial-management and legal advisers, or to welcome you at our offices at **Avenue Louise 222 in Brussels**, should that help ensure that the article accurately reflects ECES's structure, operating model, quality-management system, financial-management system and control framework.

Pending our full response, we ask that any publication avoid stating or implying wrongdoing and that ECES's final response be reflected fairly and accurately.

Kind regards,

Fabio Bargiacchi

Founder & Executive Director

European Centre for Electoral Support

222 Avenue Louise, 6th Floor, 1050, Brussels-Belgium

4 Borgo San Jacopo, 50125, Florence, Italy

Tel-WhatsApp: [+32495799704](tel:+32495799704)

Email: fabio.bargiacchi@eces.eu

Web: www.eces.eu - Instagram: [eces.eu](https://www.instagram.com/eces.eu)

From: Anca Păduraru <anca@money-monitor.eu>

Date: Friday, 5 June 2026 at 18:58

To: Monica Frassoni <Monica.Frassoni@eces.eu>; Fabio Bargiacchi <Fabio.Bargiacchi@eces.eu>

Cc: ECES - Info <EcesInfo@eces.eu>

Subject: (!) Formal right-of-reply request | EU Money Monitor investigative publication | ECES | deadline Monday 8 June 2026 at 17.00 CET

Dear Ms. Frassoni, dear Mr. Bargiacchi,

EU Money Monitor is publishing an investigative article on the transparency of EU funding to Belgian non-governmental organizations and the oversight architecture of the European Anti-Fraud Office. The article references figures and documented facts concerning ECES drawn exclusively from official public registries and ECES's own published materials. **This email constitutes a formal right-of-reply request** under standard journalistic ethics and the public interest principles that govern investigative reporting.

ECES's own website states: *"ECES strongly believes in streamlining the overarching principle of transparency throughout its work."* ECES holds TRACE certification for financial management transparency. ECES maintains a voluntary registration in the EU Transparency Register as a condition of meeting with EU institutions.

EU Money Monitor applies that stated standard, to the public registry record of ECES's own EU funding and workforce structure. Article 317 TFEU requires the EU budget to be implemented in accordance with sound financial management, while the EU Financial Regulation requires internal control, recipient-level control, reliable reporting, audit trails and traceability in the implementation of EU expenditure. EU citizens who fund ECES's work are entitled to ask whether the public record allows them to verify how those funds are managed, by whom, and through what workforce structure.

The article will publish the following figures sourced to named official public registries and ECES's own materials. These figures are drawn from ECES's own filings, public registry entries and published materials.

- From the FTS: € 77,979,531 in EU grants recorded in ECES's name, 2014–2024: between 3 and 13 parallel grants per year.
- From eleven consecutive years of NBB annual accounts filed by ECES: total services and miscellaneous expenditure classified under code 61 across the full period is €102.9 million. Total declared payroll across the same period: €1,572,882, approximately 1.5% of combined payroll and services expenditure.
- Across the last five reported years (2020–2024), declared FTE ranged between 1.0 and 2.8. In FY2020, €16,550,000 across 10 parallel grants, declared FTE was 1.5 and payroll was €12,547.
- In FY2023, with €13,409,436 in contracted EU funding across 5 parallel grants, ECES declared 1 FTE and payroll of €7,328.
- The article further notes the following arithmetic pattern in ECES's own filings: the years of highest contracted EU funding are consistently the years of lowest declared payroll. This observation is present in ECES's own accounts across eleven years.
- From the EU Transparency Register, ECES entry ID 578467420707-73, captured 5 June 2026: ECES declares 8 persons involved in lobbying activities, 4.0 FTE, with the complementary note, published verbatim by ECES, *"Currently, for all its activities, ECES staff is composed of around 200 persons in its HQ in Brussels and for its multiple ongoing projects mainly in Africa, Middle East and Latin America."*
- From the ONSS employer registry: ECES is registered in the 1–4 employee band in Belgium.
- From ECES's own public website: 33 Brussels-based staff were listed in December 2025. As of June 2026 the same page lists 15.
- Monica Frassoni: President of ECES since 2013 (16 years to date). Source: NBB filings and Belgian Official Gazette. Simultaneously: co-founder and President of the European Alliance to Save Energy (EU-ASE) since 2010; board member of the European Movement International; board member of Friends of Europe. Sources: ECES governance page, EU-ASE website, EMI website, Friends of Europe website, public registries.
- Fabio Bargiacchi: Executive Director and Administrator since 2011 (15 years to date). Source: NBB filings and Belgian Official Gazette.

The article observes that a documented gap exists between ECES's declared workforce in Belgium (1–4 registered employees) and its operational scale as presented on its own website (33 and later 15 staff) and in the FTS (€13.4 million in contracted grants in 2023 alone, across 5 parallel grants), when over €102.9 million has flowed through a single services expenditure code across those eleven years.

It further observes that, across ECES's filed annual accounts, approximately 98.5% of combined payroll and services/miscellaneous expenditure is classified under code 61 rather than declared payroll. Code 61 does not allow any citizen, journalist, or public-interest researcher to identify from the public record which part relates to external workforce, consultants, project services, administration, or other operating costs. This is a public-verifiability issue, not an allegation. In a legal environment where EU law is moving toward stronger documentation of pay structures, objective pay criteria and categories of workers under Directive (EU) 2023/970, the article asks a narrower and fully documented question: where is the workforce performing this publicly funded work visible in the public record, and under what contractual structure is it engaged?

These are questions arising from the public record. ECES's response will be published.

If any figure above is factually inaccurate, identify the specific error and provide supporting documentary evidence by Monday 8 June 2026 at 17:00 CET.

Sound financial management is written into the EU Treaty. Transparency, control and auditability are built into the EU budget framework. Public money must leave a public record.

The article's questions are limited to what the public record shows, what it does not show, and what that gap means for citizens seeking to verify how public money is managed.

Kind regards,

Anca Păduraru

Founder, **EU Money Monitor**

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Anca Păduraru

From: Anca Păduraru
Sent: Monday, 8 June 2026 20:46
To: 'Nick Aiossa (TI EU)'
Cc: Jennifer Boizumault (TI EU); Marthe Jansen (TI EU); Pia Engelbrecht-Bogdanov (TI EU); Press (TI EU); Raphaël Kergueno (TI EU); Shari Hinds (TI EU)
Subject: RE: (!) Formal right-of-reply request | EU Money Monitor investigative publication | Transparency International EU | deadline Monday 8 June 2026 at 17:00 CET

Dear Nick,

Thank you. That is clear.

Your responses will be reflected accurately and attributed to you. They identify no factual error in the documented record set out in my right-of-reply request.

The article publishes Wednesday 10 June.

My best,

Anca Păduraru

Founder, **EU Money Monitor**

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Brussels, Belgium

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From: Nick Aiossa (TI EU) <naiossa@transparency.org>
Sent: Monday, 8 June 2026 17:34
To: Anca Păduraru <anca@money-monitor.eu>
Cc: Jennifer Boizumault (TI EU) <jBoizumault@transparency.org>; Marthe Jansen (TI EU) <mjansen@transparency.org>; Pia Engelbrecht-Bogdanov (TI EU) <pengelbrecht@transparency.org>; Press (TI EU) <EUPress@transparency.org>; Raphaël Kergueno (TI EU) <rkerqueno@transparency.org>; Shari Hinds (TI EU) <shinds@transparency.org>
Subject: RE: (!) Formal right-of-reply request | EU Money Monitor investigative publication | Transparency International EU | deadline Monday 8 June 2026 at 17:00 CET

Dear Anca,

Thanks! Our clarification is below, attributed to me. Have a nice evening.

Best regards,

Nick

“TI EU maintains robust cost-allocation and financial control systems to ensure full compliance with all donor requirements. Staff record their working time in a detailed timesheet system on an hourly basis, allocating time to specific projects and funding sources, including both European Commission-funded and privately funded activities. All project-related work is recorded within the same timesheet system, creating an auditable record of how staff time is allocated across activities and funding sources.

These timesheets form part of our project management and reporting framework and are submitted to the European Commission, when required, alongside project financial and narrative reports and supporting

documentation. The totality of this documentation enables the Commission to verify that costs charged to EU-funded projects correspond exclusively to eligible project activities.

During the period of advocacy countering far right misinformation against NGOs and the boycott of the Scrutiny Working Group we were involved in two Commission-funded projects as project partners.

The first is *SECURE: Strengthening EU Collaboration to Uncover and Resist Emerging Corruption*. Transparency International, in a consortium with Transcrime (UCSC) and 10 beneficiaries, including Transparency International EU, and two law enforcement and anti-corruption agencies as associated partners, is seeking to enhance EU-level efforts against corruption by addressing current and emerging threats in Europe. For information can be found [here](#).

The second project, where we are a partner, is *Transparency Now: Strengthening Anti-Corruption Efforts in the EU Southern Neighbourhood*. This project is coordinated by the United Nations Interregional Crime and Justice Research Institute (UNICRI). More information can be found [here](#) and [here](#).

As you can see, neither project would determine activities carried out regarding the advocacy on the Scrutiny Working Group to be eligible. Which is why we proactively sought and secured dedicated funding from private foundations, which are published on our website.

For reasons of staff privacy and data protection, individual employee timesheets are not publicly disclosed.”

From: Anca Păduraru <anca@money-monitor.eu>

Sent: 08 June 2026 15:11

To: Nick Aiossa (TI EU) <naiossa@transparency.org>

Cc: Jennifer Boizumault (TI EU) <jboizumault@transparency.org>; Marthe Jansen (TI EU) <mjansen@transparency.org>; Pia Engelbrecht-Bogdanov (TI EU) <pengelbrecht@transparency.org>; Press (TI EU) <EUPress@transparency.org>; Raphaël Kergueno (TI EU) <rkergueno@transparency.org>; Shari Hinds (TI EU) <shinds@transparency.org>

Subject: RE: (!) Formal right-of-reply request | EU Money Monitor investigative publication | Transparency International EU | deadline Monday 8 June 2026 at 17:00 CET

Dear Nick,

Thank you for your prompt response and for confirming attribution. Indeed, I was not able to attend Dataharvest this year, my head was buried in data since last year's edition.

One specific clarification before publication on Wednesday. Your response states that TI-EU's advocacy for the parliamentary boycott was "exclusively funded by private foundations."

TI-EU's own website currently lists the SECURE programme (€145,562, 2025–2027) and the Transparency Now programme (€100,000, 2025–2027) as European Commission-funded projects. TI-EU's simplified annual accounts filed with the National Bank of Belgium do not allow an external reader to verify how personnel time, overhead, or shared organisational costs were allocated between Commission-funded projects and privately funded civil society advocacy.

On what documented basis does TI-EU establish that no European Commission grant funding, including personnel time or shared costs charged to those grants, contributed to the advocacy activities described in your response?

Specifically: does TI-EU maintain project-level time records and cost-allocation controls demonstrating that the staff time and organisational resources used for the boycott advocacy were charged only to cost centres funded by private foundations or to unrestricted private-foundation funding? If so, could you please identify the relevant control framework and state whether any supporting documentation is publicly accessible?

Your response as provided will be reflected in the article. Any clarification received before publication will also be reflected.

Thank you.

My best,

Anca

Anca Păduraru

Founder, **EU Money Monitor**

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From: Nick Aiossa (TI EU) <naiossa@transparency.org>

Sent: Monday, 8 June 2026 14:29

To: Anca Păduraru <anca@money-monitor.eu>

Cc: Jennifer Boizumault (TI EU) <jBoizumault@transparency.org>; Marthe Jansen (TI EU) <mjansen@transparency.org>; Pia Engelbrecht-Bogdanov (TI EU) <pengelbrecht@transparency.org>; Press (TI EU) <EUPress@transparency.org>; Raphaël Kergueno (TI EU) <rkerqueno@transparency.org>; Shari Hinds (TI EU) <shinds@transparency.org>

Subject: RE: (!) Formal right-of-reply request | EU Money Monitor investigative publication | Transparency International EU | deadline Monday 8 June 2026 at 17:00 CET

Dear Anca,

Thanks for reaching out and sorry I missed you at Dataharvest this year! Please find our response below and it can be attributed to me. Thanks, and have a lovely afternoon.

“Transparency International EU has participated in multiple Commission funded projects throughout the years. Project results and summaries are available on [corresponding project pages](#) of the Commission funding & tenders portal. Additional information on Commission funding can be found on the [EU Financial Transparency System](#) as well as the [EU transparency register](#). The primary aim of these projects is to source [best practices](#), [perform comparative analysis](#) in partnerships with our national chapters and [develop technical risk indicators](#) to assist public authorities, relevant stakeholders and EU officials in the implementation of Union policies in the field of anti-corruption, the protection of the EU’s financial interests and safeguarding the rule of law.

Transparency international EU has been at the forefront of countering the attacks on civil society from illiberal organisations and far right politicians. As part of these efforts, we successfully advocated for some political groups to [boycott](#) the illegitimate Scrutiny Working Group on NGOs in the European Parliament. All these activities have been exclusively funded by private foundations (all of which are disclosed on our website and in the Transparency Register), including but not limited to, the Adessium Foundation.”

Best regards,

Nick

Nick Aiossa

Director

Transparency International EU

M. +32 483 04 81 70

W. <http://www.transparency.eu>



From: Anca Păduraru <anca@money-monitor.eu>
Sent: 05 June 2026 18:25
To: Nick Aiossa (TI EU) <naiossa@transparency.org>
Cc: Jennifer Boizumault (TI EU) <jBoizumault@transparency.org>; Marthe Jansen (TI EU) <mjansen@transparency.org>; Pia Engelbrecht-Bogdanov (TI EU) <pengelbrecht@transparency.org>; Press (TI EU) <EUPress@transparency.org>
Subject: (!) Formal right-of-reply request | EU Money Monitor investigative publication | Transparency International EU | deadline Monday 8 June 2026 at 17:00 CET

Dear Mr. Aiossa,

EU Money Monitor is publishing an investigative article on the transparency of EU funding to Belgian non-governmental organisations and the oversight architecture of the European Anti-Fraud Office. The article references Transparency International EU in five documented categories drawn exclusively from TI-EU's own published materials and named public records. **This email constitutes a formal right-of-reply request.** Your response will be published. The absence of a response by the stated deadline will be noted in the article.

TI-EU's mission is to advocate for strong transparency measures within EU policy and greater transparency in EU decision-making. EU Money Monitor applies that standard, which TI-EU itself advocates, to TI-EU's own documented public record. Article 317 TFEU requires the EU budget to be implemented in accordance with sound financial management, while the EU Financial Regulation requires internal control, recipient-level control, reliable reporting, audit trails and traceability. EU citizens who fund TI-EU's work are entitled to ask whether the public record allows them to verify how those funds are managed, by whom, and through what structures.

Category 1: EU Commission funding to TI-EU

From the FTS, 2014–2023: 9 recorded actions in TI-EU's name. Total commitment contracted across all consortium partners: €11,953,241. TI-EU's beneficiary contracted amount, direct share: €640,208. Programmes: Internal Security Fund, Horizon 2020, Development Cooperation Instrument.

The FTS captures only direct management grants; indirect management contributions may represent additional amounts not visible in this dataset.

Additionally confirmed on TI-EU's own website as of June 2026, covering a separate period (2025–2027): €145,562 for the SECURE programme (European Commission) and €100,000 for the Transparency Now programme (European Commission).

From TI-EU's own published funding disclosures: Adessium Foundation, €304,481 core support (2026–2027) and €40,000 specifically for "Protecting Civil Society" (2025–2026). Source: transparency.eu/who-supports-us.

Category 2: TI-EU's documented role in achieving the parliamentary boycott

The article documents the following sequence from named public records.

- **28 April 2025:** TI-EU co-signed an open letter to the European Parliament's Conference of Presidents opposing the establishment of a Committee of Inquiry on NGO funding. First signatory: Civil Society Europe. Second signatory: TI-EU. The Belgian Official Gazette published on 13 August 2025 records Nicholas Anthony Aiossa among the administrators of Civil Society Europe for the

2025–2027 mandate. Neither this letter nor the subsequent boycott letter disclosed that TI-EU's Director simultaneously held an administrator role at the letter's lead signatory organisation.

- **19 June 2025:** TI-EU published a press release headlined *"Rightwing European Parliament groups take Orbán-style NGO witch-hunt to next level."* Contact person named: Nick Aiossa, Director. Published 19 June 2025 at 15:17 CET.
- **17–18 November 2025:** TI-EU authored and published a joint civil society boycott letter calling on S&D, Renew, Greens/EFA and Left group leaders to boycott the Scrutiny Working Group on NGOs. Co-signed by 30 organisations. The letter stated verbatim: *"We fully support efforts to improve transparency and accountability for all beneficiaries of EU funds."*
- The European Parliament's declared meeting records show that on the same day, 17 November 2025, TI-EU held separate declared meetings with MEP Daniel Freund and MEP Erik Marquardt, both members of the Committee on Budgetary Control, under the declared topic: *"CONT Scrutiny Working Group."* Source: EP Transparency Register, TI-EU register ID 501222919-71.
- The boycott letter and the MEP meetings: same day. Same topic. On the public record.
- **6 May 2026:** The Adessium Foundation, which funds TI-EU including specifically for "Protecting Civil Society", published an interview with Nick Aiossa under the title *"Civil society organisations under pressure in the EU."* In that interview, you stated in your own words, quoted verbatim in Dutch: *"We waarschuwen dat het legitimeren van deze controlegroep gevaarlijk is. Gelukkig is het ons gelukt hen te overtuigen, en besloten progressieve politieke groepen de controlegroep te boycotten."* Translation: *"We warned that legitimising this scrutiny group was dangerous. Fortunately we managed to convince them, and progressive political groups decided to boycott the scrutiny group."* In the same interview, you described the Scrutiny Working Group as *"een politieke, theatrale heksenjacht"* - *"a political, theatrical witch hunt."*
- The EP's declared meeting records show that on the same day, 6 May 2026, TI-EU was among the organisations meeting MEP Daniel Freund, member of the Committee on Budgetary Control and shadow rapporteur for the 2023 Commission discharge procedure, the instrument determining accountability for every EU grant awarded in 2023, under the declared topic: *"Attack against civil society."* Source: EP Transparency Register, TI-EU register ID 501222919-71.
- The article and the MEP meeting: same day. Same committee. On the public record.
- EP declared meeting records show TI-EU in 120 declared meetings with MEPs, as exported from the EP Transparency Register on 5 June 2026. The records document a concentrated shift in declared meeting topics after April 2025: from a broad mandate to a focus on discharge procedure, NGO funding scrutiny, and civil society attacks - corresponding directly to the period of TI-EU's published positions on NGO oversight. Source: EP Transparency Register, TI-EU register ID 501222919-71.

Category 3: TI-EU's selective citation of the ECA

On 13 May 2025, TI-EU published a formal rebuttal of ECA Special Report 11/2025 on NGO funding transparency. TI-EU cited the Commission's formal reply to the ECA that NGOs *"are no different from other applicants."* TI-EU's rebuttal did not cite the sentence that immediately follows in the same Commission formal reply: that the Commission's own risk tool Arachne *"cannot be used to sufficiently identify NGOs."* Both sentences appear in the same Commission document. The article notes that citing the first while omitting the second presents an incomplete account of the Commission's own position. Source: ECA Special Report 11/2025, Commission formal reply.

Category 4: The MEP leak complaint

Source: Euronews, article by journalist Sandor Zsiros, published 12 June 2025.

According to this Euronews report, TI-EU filed a complaint against MEPs for leaking sensitive NGO contracts to the press. Those contracts had been shared with CONT MEPs under confidential disclosure conditions as part of the parliamentary discharge oversight process.

The article notes the documented juxtaposition: TI-EU built and operates Integrity Watch to make MEP financial interests visible to citizens to monitor potential conflicts of interest; TI-EU stated it fully supports transparency for all EU beneficiaries; and according to Euronews, TI-EU filed a complaint when parliamentarians made EU-funded contract information public through their oversight function. The complaint document is not published on TI-EU's website. The Euronews report is the published source

relied on for this characterization. If TI-EU disputes the Euronews characterisation, this right-of-reply is the opportunity to correct it on the record.

Category 5: TI-EU's own financial transparency record

TI-EU files simplified annual accounts with the National Bank of Belgium, four consecutive years. The simplified format does not require disclosure of the split between personnel costs (code 62) and services and miscellaneous expenditure (code 61). It does not show whether EU-funded work was performed by declared employees or contracted service providers. It does not require related-party transaction disclosures.

TI-EU publishes the Corruption Perceptions Index rating 180 countries on institutional transparency. In October 2025, TI-EU demanded a parliamentary committee of inquiry into Hungarian intelligence operations, citing the Pegasus scandal as the appropriate threshold for such a committee. In April 2025, TI-EU had written that committees of inquiry are *"reserved for such sweeping scandals as Dieselgate, the Panama Papers or the use of Pegasus spyware."*

The article asks: does the transparency standard TI-EU applies to others apply equally to TI-EU's own public financial record?

Right-of-reply invitation

If any fact in the five categories above is factually inaccurate, please identify the specific error and provide supporting documentary evidence by Monday 8 June 2026 at 17:00 CET. If TI-EU has additional context or a formal position, this letter is the opportunity to place it on the published record before publication.

Sound financial management is written into the EU Treaty. Transparency, control and auditability are built into the EU budget framework. Public money must leave a public record.

Kind regards,

Anca Păduraru

Founder, **EU Money Monitor**

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Brussels, Belgium

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Anca Păduraru

From: Anca Păduraru
Sent: Monday, 8 June 2026 20:27
To: 'Interpeace Europe'
Cc: Itonde Kakoma; Simon Gimson
Subject: RE: (!) Formal right-of-reply request | EU Money Monitor investigative publication | Interpeace Europe AISBL | deadline Monday 8 June 2026 at 17:00 CET

Dear Mr Gimson, dear Mr Kakoma,

Thank you for your reply.

Two corrections for the record. The National Bank of Belgium's Consult application is not limited to the most recent five years; it provides public access to all annual accounts filed with and accepted by the NBB since 1999. And the two persons, 1.0 FTE, you cite from the Transparency Register concern interest-representation activities only, by the Register's own guidance, not Interpeace Europe's programme-delivery workforce.

Your reply identifies no numerical error in my request, and it does not answer the central question: who performed the work funded through Interpeace Europe AISBL, and under what legal and financial arrangements? I therefore ask the following before publication.

- Did Interpeace Europe file annual accounts for 2014 and 2018? If so, please provide the filing authority, the filing date and the deposit or registry reference.
- Why was Interpeace Europe AISBL, rather than Interpeace's Geneva organisation or another Interpeace entity, named as the beneficiary of the EU grants recorded in the FTS?
- What did Interpeace Europe perform itself under those grants, and what was performed by Interpeace headquarters, country offices, related entities, partners or external personnel?
- Were funds, personnel costs, management charges or other costs transferred or recharged between Interpeace Europe and other entities within the Interpeace structure? If so, under what agreements, and where can that structure be verified publicly?
- On what statutory size basis did Interpeace Europe qualify to file under the micro model for 2023, a year in which five EU-funded actions were active; and how does its 2024 account reconcile €212,107 in payroll with an average workforce of zero under code 9087?

The distinction you draw between statutory accounts and grant-level reporting is real, and it is the subject of the article: the detail available to the Commission and its auditors is not visible in the public, entity-level record and the public record is what citizens can consult.

Your reply will be published. Any documentary clarification received before publication on Wednesday 10 June 2026 will be reflected; anything later will be addressed in subsequent coverage.

Kind regards,

Anca Păduraru

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From: Interpeace Europe <brussels@interpeace.org>

Sent: Monday, 8 June 2026 17:34

To: Anca Păduraru <anca@money-monitor.eu>

Cc: Itonde Kakoma <kakoma@interpeace.org>; Simon Gimson <gimson@interpeace.org>

Subject: RE: (!) Formal right-of-reply request | EU Money Monitor investigative publication | Interpeace Europe AISBL | deadline Monday 8 June 2026 at 17:00 CET

Dear Ms. Păduraru,

Thank you for your message and for the opportunity to respond. Please find Interpeace's responses below:

Interpeace is fully committed to transparency, accountability, and the responsible use of EU funding. Interpeace Europe AISBL files statutory accounts, submits reports reviewed by accredited auditors, and makes the required corporate filings with the Belgian authorities, including through the Belgian Official Gazette / Moniteur belge where applicable, in full compliance with Belgian law. Interpeace also updates the EU Transparency Register in compliance with applicable EU requirements.

It is important to distinguish between public statutory accounts and grant-level reporting. All EU grants are subject to contractual reporting, eligibility checks, supporting documentation, audit requirements, and donor verification processes, which provide further detail beyond what is required under Belgian statutory accounting law.

We would appreciate it if you could kindly refer to the information recorded in the EU Transparency Register and the corresponding LobbyFacts entry, which indicate two staff members declared for 2024, corresponding to 1 FTE: <https://www.lobbyfacts.eu/datacard/interpeace?rid=521918914219-44>.

Regarding the reference to 2014 and 2018 filings, we would request you to clarify the source and search parameters used for this statement, as the NBB public register appears to show only the most recent five years of public records: <https://consult.cbso.nbb.be/consult-enterprise/0875218033>. Absence from a limited public search interface should not be presented as evidence of non-filing without confirmation from the competent authority.

From: Anca Păduraru <anca@money-monitor.eu>

Sent: Friday, 05 June 2026 18:03:45

To: Simon Gimson <gimson@interpeace.org>; Itonde Kakoma <kakoma@interpeace.org>

Cc: info <info@interpeace.org>

Subject: (!) Formal right-of-reply request | EU Money Monitor investigative publication | Interpeace Europe AISBL | deadline Monday 8 June 2026 at 17:00 CET

Dear Mr. Gimson, dear Mr. Kakoma,

EU Money Monitor is publishing an investigative article on the transparency of EU funding to Belgian non-governmental organisations and the oversight architecture of the European Anti-Fraud Office. The article references figures and documented facts concerning Interpeace Europe AISBL drawn exclusively from official public registries and published materials. This email constitutes a formal right-of-reply request under standard journalistic ethics and the public interest principles that govern investigative reporting.

Interpeace's global mission is to strengthen the resilience of societies and their capacity to manage conflict. Accountability and transparency are inherent to that mission. Article 317 TFEU requires the EU budget to be implemented in accordance with sound financial management, while the EU Financial Regulation requires internal control, recipient-level control, reliable reporting, audit trails and traceability in the

implementation of EU expenditure. Citizens who fund these grants through the EU budget are entitled to ask whether the public record allows them to verify how those funds are managed, by whom, and through what workforce structure.

The article will publish the following figures, drawn from Interpeace Europe AISBL's own filings, public registry entries, and published materials.

- From the FTS, 2014–2024: €15,859,808 beneficiary contracted amount recorded in Interpeace Europe AISBL's name. Parallel grants per year: 2 to 8, averaging approximately 4 per year across 2014–2024.
- From the ONSS employer registry: registered in the 1–4 employee band in Belgium.
- From the Interpeace global website, captured 5 June 2026: approximately 80 experts listed on the Our People page. Interpeace's own Brussels office page states: *"Interpeace Europe is a non-profit association based in Brussels. It represents the organization to the European Union and other European-based institutions."* Source: interpeace.org/programme/brussels-office-1/.
- From NBB annual accounts across the years in which both payroll and services are separately disclosed (FY2020–2022): payroll represents approximately 4% and services and miscellaneous expenditure (codes 60/61) represents approximately 96% of combined HR-related expenditure.
- FY2020 simplified annual account (NBB): FTS contracted EU funding €3,480,845 across 8 parallel grants; services and miscellaneous €3,222,699; payroll €37,966; staff FTE 1.0; deferred income €1,980,069.
- FY2021 simplified annual account (NBB): 6 parallel grants active; services and miscellaneous €3,248,799; payroll €104,006; staff FTE 1.3; deferred income €817,169.
- FY2022 simplified annual account (NBB): FTS contracted EU funding €5,591,179 across 8 parallel grants; services and miscellaneous €4,415,997; payroll €290,719; staff FTE 3.2; deferred income €3,243,302.
- FY2023 micro annual account (NBB): 5 parallel grants active; payroll €383,066; services and miscellaneous not separately disclosed in the micro filing format; staff FTE not reported; deferred income nil.
- FY2024 abridged annual account (NBB), deposit 2025-00584976, deposited 15 December 2025, exercise 01-01-2024 to 31-12-2024: one EU grant running (Voix des Femmes); one further action registered in FTS year 2024 (PREVEL, €2,500,000, project period 2025–2026); payroll €212,107; staff FTE declared: 0; deferred income €41,925; services not separately disclosed in the abridged format.
- Filing history: no annual account appears in the publicly accessible NBB deposit record for 2014 or 2018, years in which EU-funded grants were active.
- Simon Gimson: Président of the Interpeace Europe AISBL board (conseil d'administration of Belgian entity 0875.218.033). Source: Belgian Official Gazette (Moniteur belge), ejustice.just.fgov.be, entity 0875.218.033. Note: this refers to his role as chair of the Belgian AISBL's board of directors, not to any role in Interpeace's global governance structure.

The article observes the following pattern from the public record: Interpeace Europe AISBL represents Interpeace to EU institutions, yet declares 1–4 registered employees in Belgium. Across the three years in which services expenditure is separately disclosed in its Belgian accounts, FY2020, FY2021, and FY2022, approximately 96% of combined payroll and services expenditure flows through codes 60/61, a classification that does not allow any citizen to identify from the public record which part relates to external workforce, consultants, project services, or other operating costs. In FY2023, a year in which 5 EU-funded grants were running in parallel, Interpeace Europe AISBL filed in the micro format, the least detailed filing category available under Belgian accounting law, providing no separate disclosure of services expenditure. In FY2024, the annual account shows declared staff FTE of zero against payroll of €212,107 — with services not separately disclosed in the abridged filing format. No annual account appears in the public deposit record for 2014 or 2018, years in which EU-funded grants were active.

The article asks: what is the contractual structure of the persons performing this EU-funded work, and what level of public verifiability does the filing record provide to the citizens who fund it?

These are questions arising from the public record. Interpeace's response will be published.

If any figure above is factually inaccurate, identify the specific error and provide supporting documentary evidence by Monday 8 June 2026 at 17:00 CET.

Sound financial management is written into the EU Treaty. Transparency, control and auditability are built into the EU budget framework. Public money must leave a public record.

The article's questions are limited to what the public record shows, what it does not show, and what that gap means for citizens seeking to verify how public money is managed.

Kind regards,

Anca Păduraru

Founder, **EU Money Monitor**

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Anca Păduraru

From: Karl-Filip Coenegrachts <karl-filip@oascities.org>
Sent: Tuesday, 9 June 2026 18:14
To: Anca Păduraru
Subject: Re: (!) Formal right-of-reply request | EU Money Monitor investigative publication | OASC | deadline Monday 8 June 2026 at 17:00 CET
Attachments: Kopie van 7f48121d-89e5-486a-82ed-cac8d7c69b4b.xlsx

Dear Anca Păduraru,

First of all, I have analyzed the FTS export that you forwarded. As you can see in the annotated version that I am attaching to this email, most funded projects are listed several times. When taking out the duplicates, and taking into account that the official start date of the ACCEND project was 1st of January 2025, I count 16 parallel projects in 2024.

I am not 100% sure why this export is listing the projects on different lines, but it might have something to do with several rounds of pre-financing for the same project.

The cascading funding budget for the two projects for which OASC is the cascading grant manager, CommuniCity and DS4SSCC-DEP (colored in green in the excel file):

1. CommuniCity: 537.500€
2. DS4SSCC-DEP: 15.300.000€.

The total Financial Support to Third Parties for both projects, managed by OASC, is therefore 15.837.500€ (in my previous estimation I had also included some of the working budget for OASC).

These numbers are not shown as such e.g. in the CORDIS database for CommuniCity (<https://cordis.europa.eu/project/id/101070325>), but they can be deducted on the one hand by searching for the call for pilots on the EU Funding Portal (DS4SSCC-DEP first open call: <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/competitive-calls-cs/6861>) or by reading the call texts of the actions (CommuniCity: <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/topic-details/HORIZON-CL4-2021-HUMAN-01-19>). The most accurate publicly available information can of course be found on the project websites.

I do understand your point. It takes extensive searching for a layperson (and even for me while writing these replies) to puzzle together all this information, by only looking at the public records. In the funded projects that we are involved in as OASC we always try to be as transparent as possible about the project implementation, project governance, project organization and financial arrangements on the project websites. But of course, those websites cannot be considered official public records.

Kind regards,

Karl-Filip

Van: Anca Păduraru <anca@money-monitor.eu>
Datum: maandag, 8 juni 2026 om 17:23

Aan: Karl-Filip Coenegrachts <karl-filip@oascities.org>

Onderwerp: RE: (!) Formal right-of-reply request | EU Money Monitor investigative publication | OASC | deadline Monday 8 June 2026 at 17:00 CET

Dear Mr Coenegrachts,

Thank you for your detailed response. I am aware the timeframe was short, and I appreciate that you nonetheless engaged substantively and on the specifics. Your clarifications are material, and they will be reflected accurately in the article.

On the contracted amount: the FTS records €21,868,396 in OASC's name across 37 actions, of which a single action - DS4SSCC-DEP (2023), the European Data Space for Smart Communities - accounts for €16,206,804, roughly three-quarters of the total. Please see attached the FTS export I have extracted just now. Searching the FTS for 'Open & Agile Smart Cities' and opening the project details produces the attached result. This is the "transparency" side of the European Commission.

You state that approximately €16.5 million of the FTS total is cascading funding that OASC administers and passes to third parties as cascading-funding manager, on projects including DS4SSCC-DEP and CommuniCity. The article will present this as OASC's position and will distinguish the cascade component from the funding linked to OASC's own activity, rather than treating the €21.87 million as a single operational figure. So that the distinction is exact, could you confirm the precise cascade amount, and whether those cascade amounts and the third-party recipients are set out in any publicly accessible document?

I ask the last point for a specific reason, and it is the reason the article exists. The article does not challenge OASC's statement that its financial arrangements and reporting comply with the applicable requirements. Its standard is narrower and different: **whether a citizen who funds this work can, from the public record alone, verify and understand how the money was used and by whom.** EU budget law requires transparency, recipient information, sound financial management and audit trails. This investigation asks how far those requirements translate into a public record that citizens can actually follow without privileged access.

On that test, OASC's two filed annual accounts show the following. The 2023 accounts, filed in the abbreviated format, present the entire year as a single gross-margin line of €474,126, with no turnover, no grant income and no services figure disclosed - so neither that year's EU funding nor the DS4SSCC-DEP action is visible in them.

The 2024 accounts, in the full format, record zero declared salaries, with the large incoming funds appearing only as €11.7 million of cash held against €11.36 million of other payables - consistent with funds received for onward distribution, but nowhere identified as cascading funding, by amount or by recipient. This is precisely why your explanation matters and why the article will carry it: the cascade structure you describe cannot be established by a citizen from the public accounts. The article documents that gap, it does not allege wrongdoing.

On the workforce, the article will reflect your account in full: that the Governing Body decided in 2022 to move from employment contracts to services agreements with in-house consultants; that these costs are recorded in the annual accounts under purchases and services; that the consultants' names and roles are published on the OASC website and kept updated; and that in Horizon Europe budgets these costs are declared under category A.2, natural persons under direct contract. The article's observation is confined to the public financial record: the NBB accounts show zero declared payroll and no staff figure, so the contractual structure of the people performing the work is established by your explanation and your website, not by the financial filings a citizen would consult.

On parallel grants: the figure of 30 in my request counts FTS actions whose project period, from start date to end date, spans the 2024 calendar year. Your records show 16 actively delivered in 2024. The article will reflect your figure of 16 alongside the active-during-year basis for 30, and the list of the 30 actions is available from the FTS export attached.

The article is scheduled for publication on Wednesday 10 June 2026. Your response is reflected, and any further clarification you send before then, in particular on the cascade figure, will be reflected as well. Anything received afterwards will be addressed in subsequent coverage.

Thank you again for the openness of your reply.

My best,

Anca Păduraru

Founder, **EU Money Monitor**

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From: Karl-Filip Coenegrachts <karl-filip@oascities.org>

Sent: Monday, 8 June 2026 17:19

To: Anca Păduraru <anca@money-monitor.eu>

Subject: Re: (!) Formal right-of-reply request | EU Money Monitor investigative publication | OASC | deadline Monday 8 June 2026 at 17:00 CET

Dear Anca Păduraru,

Many thanks for reaching out with this right-of-reply request to the article that you are planning to publish on your website.

First of all, Open & Agile Smart Cities & Communities (OASC) maintains strict norms when it comes to transparency, openness and accountability. As a global network of local and regional authorities, supporting them in advancing their digital maturity, we believe strongly that this can only be achieved in a meaningful, cost efficient and ethical manner by making use of open source, open standards, open data and transparent decision-making support systems. However, we regret the very short notice - one working day! - to provide our comments and reactions. Compared to the approach of the European Commission: its internal code of good administrative behaviour states 15 business days to address queries.

On the figures in your email we can provide the following comments and additions:

- OASC has indeed been involved in many EU funded projects since the official incorporation of the network in December 2017. As a Belgian-based not-for-profit association (vzw/asbl), we have been quite successful in winning projects in several actions of Horizon Europe, Digital Europe Programme and several other funding programmes in the past years. In the period 2021-2024 it is correct that we have been involved as beneficiary or coördinator in 37 actions. However, our internal records show that in 2024 we were not involved in 30 parallel actions funded by the EU, but only in 16. I could not find the basis for your assumption either in the FTS. Worth mentioning about the €21,868,396 beneficiary contracted amount is that it also includes cascading funding budget for pilots in several projects (eg CommuniCity and the European Data Space for Smart Communities (DS4SSCC-DEP) for which OASC is/was the cascading funding manager. This part of the 21.8 million euros corresponds to around 16.5 million euros.

- Compliant with the Articles of Association (AoA), OASC is governed by a two-chamber system: a Governing Body (Bestuursorgaan - Board of Directors) composed of directors that are appointed by the 4 core members of OASC, and a Council of Cities representing the 198 local and regional authorities, appointed by their legal representatives. Both chambers have dedicated and specific roles in the decision making processes related to the overall strategy, its implementation and the financial and operational procedures, as described in the AoA. The OASC management executes the decisions of both chambers and is accountable for its work to both chambers and the General Assembly.
- In 2022 the OASC Board of Directors/Governing Body of OASC decided to switch from employment contracts to services agreements with in-house consultants to execute and follow-up funded projects, because of the specific expertise that we require, based on the needs of the projects and the type of work that is required. Oversight of the work and the financial organisation is done by the Governing Body and the Council of Cities, and projects are finances are directly supervised by the members of the Governing Body, supported by experts from the network. This is made transparant in the annual accounts under purchases and services.
- For transparency, all the names of the persons working as in-house consultants for OASC on the funded projects and their roles are listed on the website and that list is constantly updated. All the in-house consultants work with services agreements that describe the projects that are working on, their roles in those projects on behalf of OASC and the conditions that they are working under. All of them are working independently, according to the agreed conditions, and report transparently to the Governing Body and the Council of Cities of OASC.
- OASC is 100% open and transparant about working with in-house consultants in proposals and projects. In the budgets for Horizon Europe proposals, OASC is adding all personnel costs to the A.2 category (natural persons under direct contract), and financial reporting in all projects is done in those same costs categories. We keep very detailed records of everything that is related to the implementation of the internal procedures and the EU project procedures, fully compliant with European norms.

Kind regards,



OPEN & AGILE SMART CITIES & COMMUNITIES

Karl-Filip Coenegrachts

Open & Agile Smart Cities and Communities
 Chair of the Governing Body & Executive Director
 Luxemburgstraat 19 - 1000 Brussel - www.oascities.org

Van: Anca Păduraru <anca@money-monitor.eu>

Datum: vrijdag, 5 juni 2026 om 18:00

Aan: karl-filip@oascities.org <karl-filip@oascities.org>

CC: contact@oascities.org <contact@oascities.org>

Onderwerp: (!) Formal right-of-reply request | EU Money Monitor investigative publication | OASC | deadline Monday 8 June 2026 at 17:00 CET

Dear Mr. Coenegrachts,

EU Money Monitor is publishing an investigative article on the transparency of EU funding to Belgian non-governmental organisations and the oversight architecture of the European Anti-Fraud Office. The article references figures and documented facts concerning OASC drawn exclusively from official public registries. This email constitutes a formal right-of-reply request.

Article 317 TFEU requires the EU budget to be implemented in accordance with sound financial management, while the EU Financial Regulation requires internal control, recipient-level control, reliable reporting, audit trails and traceability in the implementation of EU expenditure. EU grant agreements require beneficiaries to demonstrate the human and operational capacity to carry out the work for which public funding is awarded. EU citizens who fund these grants are entitled to ask whether the public record allows them to verify that those obligations are met.

The article will publish the following figures. These figures are drawn from OASC's own filings and public registry entries.

- From the FTS, 2019–2024: €21,868,396 beneficiary contracted amount recorded in OASC's name across 37 actions. Parallel grants: up to 30 in 2024.
- From the ONSS employer registry: OASC is NOT registered as an employer. The ONSS employer record was removed on 15 November 2021. Source: ONSS employer registry.
- From OASC's own website: 21 staff listed in December 2025, 20 staff today.
- From NBB annual accounts: payroll represents 1% and purchases and services (codes 60 and 61) represent 99% of combined expenditure across all reported years.
- FY2024 full annual account (NBB): FTS contracted EU funding €735,999; 30 parallel grants; purchases and services €1,724,323; payroll €0; staff FTE 0; deferred income €3,247,263.
- FY2023 simplified annual account (NBB): FTS contracted EU funding €17,992,435; 14 parallel grants (an *active-during-year* count); services and miscellaneous €0; payroll €9,756; staff FTE 0; deferred income €4,067,024.
- HR transparency classification in the EU Money Monitor dataset: the public record is insufficient to assess workforce structure.

The article observes the following pattern arising from the public record: OASC has not been registered as an employer in Belgium since November 2021, yet lists 21 staff on its website and managed 30 simultaneous EU-funded actions in 2024 alone. In FY2023, with €17,992,435 in contracted EU funding across 14 parallel grants, declared payroll was €9,756 and declared staff FTE was zero.

The public record does not allow any citizen, journalist, or public-interest researcher to identify the contractual structure of the persons performing this publicly funded work. The article asks: how is this work performed, by whom, and under what contractual arrangements; and why is this not visible in the public record of an organisation managing over €21 million in EU grants?

These are questions arising from the public record. OASC's response will be published.

If any figure above is factually inaccurate, identify the specific error and provide supporting documentary evidence by Monday 8 June 2026 at 17:00 CET.

Sound financial management is written into the EU Treaty. Transparency, control and auditability are built into the EU budget framework. Public money must leave a public record.

The article's questions are limited to what the public record shows, what it does not show, and what that gap means for citizens seeking to verify how public money is managed.

Kind regards,

Anca Păduraru

Founder, **EU Money Monitor**

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Anca Păduraru

From: Marie-Christine BONNAMOUR <mc.bonnamour@psc-europe.eu>
Sent: Wednesday, 10 June 2026 18:29
To: Anca Păduraru
Cc: Mario DROBICS
Subject: RE: (!) Formal right-of-reply request | EU Money Monitor investigative publication | PSCE | deadline Monday 8 June 2026 at 17:00 CET

Dear Ms Paduraru,

On the basis of the information received, we would like to provide the following remarks:

The main objective of PSCE is to enhance public safety in Europe. Since its establishment, PSCE has participated in EU-funded projects to achieve this objective. According to the specific characteristics of these projects, PSCE collaborates with many public and private organisations. Their participation may be either direct as project partner or as affiliated entities under PSCE. The budget received by PSCE as coordinator is distributed among these entities. Moreover, in some projects, a very large portion of the grant (up to 70%) is allocated to public procurement. Under European rules, these costs are recorded under the lead procurer, who acts in the name of and on behalf of the entire group of procurers. In other words, the amounts reported are not exclusively allocated to PSCE but reflects the overall efforts, PSCE is coordinating.

PSCE experts carry out the work allocated to the organization according to EU financial rules. PSCE is fully aware of its high responsibility in managing this public funding and subject to oversight by external auditors and regularly controlled by the EC.

Best regards,

Marie-Christine BONNAMOUR

Secretary General



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From: Anca Păduraru <anca@money-monitor.eu>

Sent: Monday, 8 June 2026 11:37

To: Marie-Christine BONNAMOUR <mc.bonnamour@psc-europe.eu>

Cc: Mario DROBICS <mario.drobics@psc-europe.eu>; PSCE Administration <adm@psc-europe.eu>

Subject: RE: (!) Formal right-of-reply request | EU Money Monitor investigative publication | PSCE | deadline Monday 8 June 2026 at 17:00 CET

Dear Ms. BONNAMOUR,

Thank you for your reply. I can extend the deadline until Wednesday 10 June at 10.00 CEST and if you find this time sufficient, your response will be reflected in the article at publication. Otherwise, your response will anyway be addressed in subsequent coverage.

Please also note that for this article, five organisations were selected for detailed profiling from the 758 verified NGOs on multiple criteria applied uniformly, such as high EU grant volume contracted in the beneficiary's name, parallel grant portfolios, a low declared payroll or employer footprint relative to the operational scale, lack of public filings or public filings that do not answer transparency and traceability questions.

The article documents a structural pattern across 758 verified Belgian NGO and non-profit EU grant beneficiaries, cross-referenced across four public registries, FTS, CBE, ONSS, and NBB, covering a €7.89 billion funding universe in EU grants over a decade, of which 92.41% was verified at entity level against public registries; and also addresses broader structural questions about Brussels NGO leadership and institutional proximity. It does so for the sector as a whole, not for PSCE alone.

Let me know if you need any clarifications or have any questions.

Kind regards,

Anca Păduraru

Founder, **EU Money Monitor**

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From: Marie-Christine BONNAMOUR <mc.bonnamour@psc-europe.eu>

Sent: Monday, 8 June 2026 11:08

To: Anca Păduraru <anca@money-monitor.eu>

Cc: Mario DROBICS <mario.drobics@psc-europe.eu>; PSCE Administration <adm@psc-europe.eu>

Subject: RE: (!) Formal right-of-reply request | EU Money Monitor investigative publication | PSCE | deadline Monday 8 June 2026 at 17:00 CET

Dear Ms Paduraru,

We have just become aware of your message this morning, which has our full attention. Your request, covering a decade of projects, has been forwarded to our accountant, who will review the financial data associated with these projects.

We will revert to you in due course; however, meeting today's deadline is not feasible. We will make every effort to provide you with comprehensive responses to your questions as soon as possible.

Best regards,

Marie-Christine BONNAMOUR

Secretary General



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From: Anca Păduraru <anca@money-monitor.eu>

Sent: Friday, 5 June 2026 18:01

To: Mario DROBICS <mario.drobics@psc-europe.eu>

Cc: PSCE Secretariat <secretariat@psc-europe.eu>

Subject: (!) Formal right-of-reply request | EU Money Monitor investigative publication | PSCE | deadline Monday 8 June 2026 at 17:00 CET

Dear President Drobics, dear PSCE Board,

EU Money Monitor is publishing an investigative article on the transparency of EU funding to Belgian non-governmental organisations and the oversight architecture of the European Anti-Fraud Office. The article references figures and documented facts concerning PSCE drawn exclusively from official public registries. This email constitutes a formal right-of-reply request.

Article 317 TFEU requires the EU budget to be implemented in accordance with sound financial management, while the EU Financial Regulation requires internal control, recipient-level control, reliable reporting, audit trails and traceability in the implementation of EU expenditure. The citizens who provide public funding through the EU budget are entitled to verify through public records how those funds are managed, by whom, and at what cost.

The article will publish the following figures. These figures are drawn from PSCE's own filings and public registry entries.

- From the FTS, 2014–2023: €17,310,358 beneficiary contracted amount recorded in PSCE's name across 15 actions. Parallel grants per year: up to 8 (peak in 2023).
- From the ONSS employer registry: PSCE is NOT registered as an employer. Source: ONSS employer registry.
- From PSCE's own website: no staff disclosed.
- From NBB annual accounts (abridged format): cost headings 60/61 and 62 are present in the filing structure but left blank across all reported years. The average staff field (code 9087) is not filled.
- Deferred income (code 492/3): rose from €782,305 in 2019 to €4,254,865 in 2023.
- Annual results: negative in 2020, 2021, 2022, and 2023.

The article observes the following pattern from the public record: PSCE is not registered as an employer in Belgium, discloses no staff on its website, leaves all workforce cost fields blank in its annual accounts, and has recorded four consecutive years of negative financial results — while managing over €17.3 million in EU grants across 15 actions and a decade. The public record provides no basis for any citizen, journalist, or public-interest researcher to identify who performs this publicly funded work, under what contractual structure, or at what cost. The article asks those questions directly.

These are questions arising from the public record. PSCE's response will be published. If any figure above is factually inaccurate, identify the specific error and provide supporting documentary evidence by Monday 8 June 2026 at 17:00 CET.

Sound financial management is written into the EU Treaty. Transparency, control and auditability are built into the EU budget framework. Public money must leave a public record.

The article's questions are limited to what the public record shows, what it does not show, and what that gap means for citizens seeking to verify how public money is managed.

Kind regards,

Anca Păduraru

Founder, **EU Money Monitor**

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Sound financial management. Transparency. Traceability. Written into the EU Treaty & Financial Regulation. Owed to every citizen who funds it.