



MILLENNIUM CHALLENGE ACCOUNT MOROCCO  
وكالة حساب قعدى الألفية-المغرب

## **ACTION PLAN FOR PREVENTING, DETECTING AND REMEDIATING FRAUD AND CORRUPTION IN MCA-MOROCCO COMPACT IMPLEMENTATION**

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## **MCA-MOROCCO ACTION PLAN FOR PREVENTION, DETECTION, AND REMEDIATION OF FRAUD AND CORRUPTION**

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### **11. Introduction**

MCA-Morocco is mandated to implement the Millennium Challenge Compact II signed between the Government of Morocco and the Government of United States of America, through the Millennium Challenge Corporation (MCC), in November 30<sup>th</sup>, 2015. The objective of establishing MCA-Morocco is to implement the Compact II in order to reduce poverty through economic growth in Morocco. The Compact is comprised of two projects :

(i) "Education and training for employability Project", which includes:

- Secondary Education Activity;
- Workforce Development Activity;
- TVET Activity.

(ii) "Land Productivity Project", which includes

- Land Governance Activity;
- Industrial Land Activity;
- and Rural Land Activity.

### **12. Purpose**

The purpose of the Anti-Fraud & Corruption Action Plan (AFC AP) is to establish an appropriate framework that defines how the staff and management of MCA-Morocco will join with its Implementing Entities (IEs) towards effective prevention, detection and remediation of fraud and corruption of any description within MCA-Morocco.

### **13. Scope**

The MCA- Morocco's AFC AP is meant to address all stakeholders involved in the implementation of the Compact and includes MCA-Morocco Board and staff, Implementing Entities, as well as MCA-Morocco contractors for works, goods and services.

### **4. MCC Policies targeted at Fraud & Corruption**

In an effort to prevent fraud and corruption during implementation of Compact activities, MCC developed various Policies and Procedures targeted at addressing such instances. Some of these policies are described below:

- Policy on Preventing, Detecting and Remediating Fraud and Corruption in MCC's Operations (MCC AFC Policy).
- Guidelines for Accountable Entities and Implementing Structures.

#### 4.1 Policy on Preventing, Detecting and Remediating Fraud and Corruption in MCC's Operations (MCC AFC Policy)

In March 2009, MCC developed a policy on Preventing, Detecting and Remediating Fraud and Corruption in MCC's operation that requires all MCAs to complete a Compact specific Anti-Fraud and Corruption Risk Assessment and to develop and implement a related Action Plan. Research made by MCC revealed that corruption retards economic growth by:

- Increasing costs;
- Lowering productivity;
- Discouraging investment;
- Reducing confidence in public institutions;
- Limiting the development of small and medium sized enterprises;
- Weakening systems of public financial management; and
- Undermining investments in health and education.

Corruption also increases poverty by:

- Slowing economic growth;
- Skewing government expenditure in favour of the rich and well-connected;
- Concentrating public investment in unproductive projects; and
- Promoting a more regressive tax system.

MCC's AFC Policy recognizes six types of fraud and corruption:

- 4.1.1. Coercion: Impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of any party, to influence improperly the actions of a party in connection with the implementation of any contract supported, in whole or in part, with MCC funding, including such actions taken in connection with a procurement process or the execution of a contract.
- 4.1.2 Collusion: A tacit or explicit agreement between two or more parties to engage in a coercive, corrupt, fraudulent, obstructive or prohibited practice, including any such agreement designed to fix, stabilize, or manipulate prices or to otherwise deprive the Accountable Entity of the benefits of free and open competition.
- 4.1.3 Corruption: The offering, giving, receiving, or soliciting, directly or indirectly, of anything of value to influence improperly the actions of a public official, Accountable Entity staff, MCC staff, consultants, or employees of other entities engaged in work supported, in whole or in part, with MCC funding, including such work involving taking or reviewing selection decisions, otherwise advancing the selection process or contract execution, or the making of any payment to any third party in connection with or in furtherance of a contract.
- 4.1.5 Fraud: Any act or omission, including any misrepresentation, that knowingly or recklessly misleads or attempts to mislead a party in order to obtain a financial or other benefit in connection with the implementation of any contract supported, in whole or in part, with MCC funding, including any act or

omission designed to influence (or attempt to influence) a selection process or the execution of a contract, or to avoid (or attempt to avoid) an obligation.

- 4.1.4 Obstruction of investigation into allegations of fraudulent or corrupt practice: Any act taken in connection with the implementation of any contract supported, in whole or in part, with MCC funding: (a) that results in the deliberate destroying, falsifying, altering or concealing of evidence or making false statement(s) to investigators or any official in order to impede an investigation into allegations of a coercive, collusive, corrupt, fraudulent, or prohibited practice; or (b) that threatens, harasses, or intimidates any party to prevent him or her from either disclosing his or her knowledge of matters relevant to an investigation or from pursuing the investigation; or (c) that is intended to impede the conduct of an inspection and/or the exercise of audit rights of MCC and/or the Office of the Inspector General (OIG) responsible for MCC provided under a compact, threshold program agreement, or related agreements.
- 4.1.6 Prohibited practice: Any action that violates Section E (Compliance with Anti-Corruption, Anti-Money Laundering, Terrorist Financing, and Trafficking in Persons Statutes and Other Restrictions) of the Annex of General Provisions that will be made a part of MCC-funded contracts and may be found as part of the Standard Bidding Document templates (there referred to as “Annex A: Additional Provisions”) on the MCC website at <http://www.mcc.gov>.

4.2 Conflicts of interest should be openly and duly managed, as they can open the door to fraud and corruption.

## **5. Anti-Fraud & Corruption Action Plan (AFC AP) to combat fraud and corruption**

- 5.1 In compliance with MCC policy directives, MCA-Morocco developed this AFC AP to address the highest priority risks listed in the Anti-Fraud and Corruption Risk Assessment Matrix.
- 5.2 The AFC AP will describe both the process and results of the AFC Risk Assessment and provide a detailed pathway for implementing additional measures to mitigate risks identified in the assessment.
- 5.3 The AFC AP complements an array of internal policies adopted by MCA-Morocco, in conjunction with MCC, to assure the orderly operation of the Management Unit. The policies discussed below aim to promote good governance, strengthen internal controls and to deter fraudulent and corrupt schemes in MCA-Morocco operations.

## **6. MCA-Morocco Policies targeting Fraud and Corruption**

The MCA-Morocco Management Unit was established as a new organisation and apart from the Compact and Implementation Agreement governing the Management Unit; more detailed subject related policies were developed to govern the organisation. Some of these policies are described below:

- Fiscal Accountability Plan;
- Program Procurement Rules and Standard Bidding Documents;
- Bid Challenge System;
- Conflict of Interest Policy;
- Compact, Program Implementation Agreement and MCA Bylaws;
- Employee Handbook & Standard Employment Contract;
- Regular audits; and
- Performance Management System.

### **6.1 Fiscal Accountability Plan**

MCA-Morocco adopted its Fiscal Accountability Plan (FAP) in May 2017 to serve as a set of treasury rules for all financial and procurement actions undertaken by the Management Unit. To remain relevant to the operational requirements of MCA-Morocco, the FAP is being reviewed whenever necessary. MCA-Morocco regards the FAP as an important management tool and has promoted widespread understanding and knowledge of the FAP amongst all staff. Brief presentations on specific sections of the FAP were given occasionally in monthly staff meetings. This familiarization of all staff was well received and increased awareness of strong internal controls. This may have acted as a deterrent for corruption.

### **6.2 MCA-Morocco Compact Procurement Rules**

The MCA-Morocco Program Procurement Rules, served and continues to serve, as a pillar of good governance bringing the following main attributes to MCA-Morocco :

- Detailed Procurement Processes and Guidelines;
- Clear delegation of staff roles involved in procurement;
- Guidance on treatment of actual and potential conflicts of interest;
- Demarcating the joint approval system between MCC and the MCA-Morocco Board in procurement activities; and
- Promotion of transparency through publication of procurements and contract awards on the MCA-Morocco Website and international procurement sites.

### **6.3 MCA-Morocco Bid Challenge System**

The MCA-Morocco Bid Challenge System (BCS) gives bidders an opportunity to be heard when doubtful of procurement outcomes. Its purpose is to provide Bidders who believe that they have been harmed by an MCA-Morocco procurement action or decision the ability to seek a prompt, impartial and cost-effective review of the action or decision in order to promote and maintain the integrity and transparency of the MCA-Morocco procurement process.

### **6.4 MCA-Morocco Conflict of Interest Policy**

In July 2018, MCA-Morocco adopted a policy to provide for the treatment of conflicts of interest involving staff and board members. Since then staff makes annual declarations on possible conflicting situations. The policy has provided valuable guidance in treatment of *ad hoc* situations of conflicting interests emerging during implementation of the Compact. Once a staff member declares a conflicting interest, the Legal Advisor makes a ruling in terms of the policy whether the conflict can be duly mitigated or is too grave to be mitigated and the situation must be avoided. Declarations and rulings are fully documented in a record kept under the control of the Legal Advisor and Secretary to the Board.

### **6.5 MCA-Morocco Employee Handbook and Standard Employment Contract**

MCA-Morocco adopted and developed an Employee Handbook (HR-Manual) and Standard Employment Contract to ensure consistency and equity in human resource specific issues, maintaining a conducive and enabling working environment.

Typical ways in which these management tools target or aim to combat fraud and corruption is by providing clear rules regarding:

- Basic Conditions of Employment to prevent favouritism and nepotism;
- Clear rules on Leave and Compensation Administration;
- Housekeeping rules regarding Telephone costs and Accountability for MCA-MOROCCO Assets;
- Ethical conduct including guidance on dealing with hawkers, vendors and family members; and
- Acceptance of gifts and favours in the employment situation.

## 6.6 MCA-Morocco Performance Management System

In October 2017, MCA-Morocco adopted a detailed Performance Management System to manage and incentivize staff performance. Though the main goal of this management tool is to manage performance and incentivize staff, it is fair to say that the system also delivered some important “fall-outs” from a fraud and corruption perspective, *inter alia*:

- Preventing fraudulent and arbitrary practices when rewarding staff performances ;
- Incentivizing and rewarding staff in a transparent and predictable manner; and
- Increased productive use of MCA-Morocco time and resources.

## 7 MCA-Morocco Methodology for AFC AP

The methodology used in developing the AFC Action Plan towards effective prevention, detection and remediation of fraud and corruption of any description within MCA-Morocco involved the following:

- AFC training provided in September 2018, to MCA-Morocco staff and stakeholder representatives
- Establishment of MCA-Morocco /MCC Joint Working Group on Fraud and Corruption
- Kick Off meeting (telephonic) to discuss the draft AFC Risk Assessment Matrix
- MCC field study to MCA-Morocco, meeting with staff, key contractors, Board members, and other stakeholders
- Development of MCA-Morocco AFC AP

The process is described in more detail in Annex A.

## 8. MCA-MOROCCO AFC ACTION PLAN

After careful deliberation of the AFC risk assessment matrix, the MCC/MCA-Morocco Joint Working Group was in agreement that the fraud and corruption risk in most areas of the MCA- Morocco Compact Implementation is duly mitigated. They agreed that the MCA-Morocco AFC Action Plan would focus on the risks rated with a high likelihood and/or high impact risk. Such risks are concentrated in Procurement and Infrastructure Works Construction and are detailed in the Table below.

### 8.1 Risk of fraud in carrying out literacy training or other training activities

Sector Risk	Risk of fraud in carrying out literacy training or other training activities
Description of Risk	Falsified deliverables/receipts, or falsified milestones reached (i.e. # of students trained).
Factors in Mitigation	* Unannounced checks * Partners, especially procurement and financial staff, should be invited to AFC seminar

Timing	With every contract negotiation and during contract implementation
Additional Cost (if any)	Negligible
Office Responsible	Rural Land Director

### 8.2 Risk that Project-Affected Person (PAP) recipient claims non-payment

Sector Risk	Potential Resettlement Action Plan (RAP) issues that could lead to fraud in implementation of RAP
Description of Risk	Under or over payment of the settlement amount (e.g. RAP Implementer and/or local officials take cut from proper amount owed to PAP), or PAP recipient claims non-payment after receiving funds
Factors in Mitigation	<ul style="list-style-type: none"> <li>* Legal proceedings</li> <li>* Engagement with stakeholders [public outreach and education on rights, basis of estimates, etc.] through Stakeholder Committee</li> <li>* Photos of PAPs receiving payments</li> <li>* All payments done via bank accounts.</li> </ul>
Timing	With every transaction
Additional Cost (if any)	Negligible
Office Responsible	ESP Director

### 8.3 Risk that The Public-Private Partnership (PPP) under the Pilot Sites Activity of the Land Productivity Project is not fairly competed due to collusion between Parties

Sector Risk	The PPP is not fairly competed due to collusion between the Ministry, MCA, the Transaction Advisor and potential PPP bidders or a sub-set of these actors
Description of Risk	Relationships with potential PPP bidders may form during market outreach and this could lead to selection of private partner that is not best qualified, but that has the strongest relationships.
Factors in Mitigation	Ensure MCC or MCC consultants observe this process and review all relevant documentation to identify any irregularities.
Timing	During the whole process.
Additional Cost (if any)	Negligible
Office Responsible	Pilot Sites Director

### 8.4 Risk that FONZID Grantee may not spend funds on the intended purpose

Sector Risk	Grantees do not have the capacity to properly manage funds or engage in fraud with MCC funds.
Description of Risk	<p>Grantee may not spend funds on the intended purpose, leading MCA to have to terminate the grant and recover the funds.</p> <p>Falsified deliverables, timesheets or documents.</p> <p>Fraud on procurements under \$200k.</p> <p>Grantee contributions falsified.</p>
Factors in Mitigation	<ul style="list-style-type: none"> <li>* Do spot checks of grant manager due diligence and replace relevant personnel in case of poor performance.</li> <li>* Unannounced visits to grantees.</li> </ul>



	* Possible use of collective procurements for items needed by multiple grantees..
Timing	During the entire period of projects implementation
Additional Cost (if any)	Negligible
Office Responsible	FONZID Director

### 8.5 Risk of fraud in carrying out activities entrusted to grantees under the Education and Training for Employability Project

Sector Risk	Risk of fraud in carrying out activities entrusted to grantees:
Description of Risk	Falsified deliverables/receipts, or falsified milestones reached (i.e. # of students trained).
Factors in Mitigation	* Unannounced checks. * Partners, especially procurement and financial staff, should be invited to AFC seminar.
Timing	For each payment.
Additional Cost (if any)	Negligible
Office Responsible	Finance Director

### 8.6 Bribes during contract's amendment negotiation process

Sector Risk	Corrupt negotiations for contract amendments / additional work
Description of Risk	Informal negotiations and price negotiations, particularly when contract amendment is needed
Factors in Mitigation	MCC's informal review and / or MCC's Non-Objection are required for such amendments to contracts.
Timing	With each amendment with additional cost.
Additional Cost (if any)	Negligible
Office Responsible	Procurement Director

### 8.7 Collusion: Undisclosed conflict of interest between TEP member and a bidder

Sector Risk	Undisclosed conflict of interest between a Technical Evaluation Panel member and a bidder
Description of Risk	The Panel Member and the Bidder agree to improperly influence the contracting process, which may result in the selection of an unskilled bidder.
Factors in Mitigation	* Procurement Agent reports favouritism of panellist to bidder. * Procurement Agent should review CVs of non-MCA staff for connections to bidders.
Timing	For each amendment with additional cost.
Additional Cost (if any)	Negligible
Office Responsible	Procurement Director

### 8.8 Risk of reputation of bidders and/or litigation

Sector Risk	Questionable reputation of bidders and/or litigation
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Description of Risk	Rumours and red flags should be a cause for close scrutiny.
Factors in Mitigation	MCA or Procurement Agent report any suspect case to MCC. Strong oversight and management of contracts if any are signed with bidders with questionable reputation
Timing	For each procurement.
Additional Cost (if any)	Negligible
Office Responsible	Procurement Director

### 8.9 Short periods between announcement of opportunity and deadline

Sector Risk	Short periods between announcement of opportunity and deadline
Description of Risk	Not to leave sufficient time for bidders in order to favour certain contractor that had advance knowledge of opportunity.
Factors in Mitigation	MCA's Procurement Agent can raise concerns directly with MCC, MCC reviews the procurement period durations regularly through MCA's Procurement Performance Report.
Timing	For each procurement.
Additional Cost (if any)	Negligible
Office Responsible	Procurement Director

### 8.10 Premature liquidation of performance guarantees

Sector Risk	Legal Risks
Description of Risk	Premature liquidation of performance guarantees, or MCA does not issue claim against a performance guarantee.
Factors in Mitigation	All performance guarantees are transferred to the successor entity to MCA-Morocco with a copy to MCC.
Timing	During the MCA-Morocco's closing up.
Additional Cost (if any)	Negligible
Office Responsible	Legal Director

## 9. Role of MCA-Morocco Board and MCC

- The AFC AP shall be submitted to the MCA-Morocco Board for information and to MCC for approval.
- The Risks recorded in the AFC Action Plan shall be reported on a semi-annual basis to the Board in information session to provide feedback on implementation of mitigation measures.

## 10. Revision and Monitoring

- MCA-Morocco Management shall at semi-annual intervals (or upon significant changes to the AFC context) update the AFC AP.
- An AFC Action Plan progress report shall be posted semi-annually on MCA-Morocco's website after approval by MCC.

Effective risk management requires flexible, responsive, continuous learning of best practices and skills. Lessons learned will contribute to refined oversight strategy in relation to the AFC Action Plan. With this commitment in mind, MCA-Morocco AFC risk assessment matrix and this Action Plan will be revised and improved regularly during their implementation.

The revisions will include different actions, depending the scope and purpose :

- eliminating some risks and mitigants and amending/adding new ones;
- adopting new actions, which will facilitate detection of fraud and corruptions;
- improving the system for responding to fraud and corruption;
- improving the system for prompt and proportional remediation;
- other actions.

Revisions to the AFC Action Plan may also be initiated by MCA management, MCA Project Directors, MCA Board, MCC technical staff, and/or MCC Resident Country Director as needed. MCA-Morocco will prepare the final draft for the Board's information and MCC's final approval. The final versions of revised AFC Action Plan will be made available on the MCA-Morocco website.

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## **Annex A: MCA-MOROCCO Methodology for Developing the AFC Action Plan**

### **Organization-wide Anti-Fraud and Corruption Training**

A three-day training intervention on fraud and corruption took place in September 2018 with objective to create awareness amongst all staff members regardless of status and designation in MCA-Morocco. The training covered fraud and corruption risks related to Compact Start-up (Project design/Beneficiary selection), Compact Implementation (Procurement, Contract Management, Financial/Administrative Management) and Compact Closeout. The participants were presented with case studies to expose them to real life occurrences of fraud and corruption related to their specific daily tasks. They also discussed measures which might be taken to reduce the risk and occurrence of fraud and corruption, and the standard mitigants that have been developed by MCC.

### **Joint MCC/ MCA-Morocco Working Group on Anti-Fraud and Corruption**

In October 2018, a joint MCC and MCA-MOROCCO working group was formed to develop and review the Anti-Fraud and Corruption risk assessment matrix. The working group consisted of a core team that worked with MCC and MCA technical directors and staff as necessary.

#### **The Core Team**

- MCA-Morocco Staff:
  - Essaid Azzouzi (Deputy Director General)
  - Mohamed Hammoumi (General Counsel)
  - Youssef Medouar (Procurement Director),
  - Bouchra Belhacen (CFO),
  - Oussama Hilali (General Affairs Director)
  - Fatima Elbaz (Officer in charge of coordination)
- MCC Staff:
  - Chris Williams (Senior Director on AFC, MCC)
  - Richard Messick (Senior AFC Advisor, MCC)

### **Kick-Off Activities and Development of AFC Risk Assessment Matrix**

In April 2019, as the initial stage in the AFC risk assessment process, the Joint Working Group conducted several “kick-off” sessions on fraud and corruption via teleconference. It was agreed that MCA-Morocco would draft sector-based AFC risk matrices with close involvement of the MCA-Morocco technical staff.

### **Development of Fraud and Corruption Risk Assessment Matrix**

The sector matrices were developed by MCA-Morocco Directors after an internal discussion on methodology and development of a template for the AFC risk assessment matrix. The draft matrix identified possible activities of fraud and corruption that may occur in the MCA-Morocco Compact per sector, showing the impact and likelihood of the risks on the Compact. It also proposed the appropriate mitigation measures to prevent or limit the impact and likelihood of these risks. MCC Directors and staff independently developed their own version of the AFC risk assessment matrix to encourage creative and wide-ranging consideration of the context relevant to the specific Compact program as well as their professional experience. The consolidated draft matrices were shared between MCA-Morocco and MCC, and then reviewed by the Joint Working Group with the relevant MCA and MCC staff in seven subsequent sessions via teleconference. The matrix was then updated to reflect the discussions and input from representatives of MCC’s AFC Team. Directors focused to identify risks which they

saw unfolding during the three years of Compact Implementation, using their experience in the field to suggest mitigation measures.

### **Field Visit to MCA-Morocco**

Mr. Chris Williams, MCC Senior Director for Anti-Fraud and Corruption, and Richard Messick, MCC Senior AFC Advisor, conducted a week-long field visit in October 14th – 18th, 2019.

### **Individual Interviews with MCA-Morocco Staff**

The MCC delegates, joined by MCA-Morocco AFC core team members, met with MCA-Morocco staff members. Each section of the AFC risk assessment matrix as compiled by individual members and refined in team telecom discussions, was reviewed and discussed in these sessions. The team members agreed on the final description of risks, the mitigation measures most practical at this stage of the MCA-Morocco Compact implementation, and the likelihood and impact of the risks identified. The MCC delegates also advised the MCA-Morocco team members regarding the risks to be addressed in the AFC AP for MCA-Morocco.

### **Interviews with Institutional Partners (Implementation Entities) and other stakeholders**

The MCC delegates, joined by MCA-Morocco AFC core team members, met with MCA-Morocco's Public Partners concerned by the Compact Projects Implementation (Implementation Entities). The purpose of these discussions was to give explanation about the Risk Assessment process and goals, explain that MCC is working with all MCAs on this exercise to help MCAs better minimize risks of F&C and discuss several related questions such as : how can the Implementation Entity contribute to this effort? What risks of F&C do they see? How does the Implementation Entity execute supervise/oversee responsibilities? What measures should be taken to limit those risks?, etc.

The following Implementation Entities were interviewed:

- Central Coordinator of Secondary Education PMU (Ministry of National Education and vocational training);
- Land Industrial PMU Team (Ministry of Industry)
- Deputy Director for Rural Affairs (Ministry of Interior);

The MCC delegates, joined by MCA-Morocco AFC core team members, met also with Anti-Corruption National Instance representatives (Director for Strategy, General Affairs Director and Chief Of Staff). The purpose of these discussions was to give explanation about the Risk Assessment process and goals and to get an idea of the general assessment of the National Instance regarding the risk of corruption in the sectors concerned by the Compact projects.

### **Interviews with MCA-Morocco Contractors**

The MCC team, joined by MCA-Morocco team members, also met with MCA-Morocco contractors, selected to be representative of all MCA-Morocco projects, and secondly depending on the availability of the contractors during the MCC field visit. The purpose of these discussions was to sensitize contractors about the MCA-Morocco stance on corruption and the pro-active measures in place to create an anti-corruption culture in the organization, through training, the development and on-going management of an AFC risk assessment matrix, and the AFC AP. The contractors were also given an opportunity to share their experience and ideas about possible windows of opportunity for fraud and corruption.

The contractors were interviewed in small delegations of two or three persons. They generally welcomed the initiative and actively contributed to the discussions pointing to fraud and corruption risks, proposing prevention measures. The following contractors were interviewed:

	<b>Contractor</b>	<b>Interaction with Joint Team</b>	<b>Contract Name and Number</b>
1	Auditors (BDO LLP)	Interview via Conf Call	<b>PP-13-R</b> – Audit Services
2	Consortium NOVEC-Saftop-Cabinet Taouhid	Interview / MCA-Morocco Office	<b>LR-01-</b> Melkization Implementation Project (Rural Land Activity)
3	Consortium NIRAS Finland Oy-Adalia Oy, Snyopter Sarl	Interview / MCA-Morocco Office	<b>LI-04</b> – Fonzid Grant Manager (Land Industrial Activity)
4	Consortium GOPA mbH/AFCI Consultants Maroc	Interview / MCA-Morocco Office	<b>EW-11-</b> “Charaka” Fund Manager (Vocational Training Sub Activity)
5	Instiglio Inc.	Interview via Conf Call	<b>EW-01-</b> Development of employment programs through results-based funding (Employability Sub Activity)

### **Field Visit to Project Site**

The MCC delegates, accompanied by the Project Manager, visited the Schools construction sites of the MCA-Morocco in Tanger-Tetouan-Houceima Region (Secondary Education Activity). Site managers met with the delegation and provided a guided tour of the sites.

### **Conclusions and Outcomes of Field Study**

- MCC delegates gained valuable insights into progress of the MCA-Morocco Compact Implementation and the realities on the ground.
- The mission embedded the importance of actively driving an anti-fraud and corruption culture with MCA-Morocco leadership, providing tangible measures to develop and implement such culture.
- The MCC/MCA-Morocco Joint Working Group reached final agreement on the high impact risks to be addressed in the AFC AP.