Administration Agreement between the European Commission on behalf of the European Union and the International Bank for Reconstruction and Development concerning the Part II Europe 2020 Programmatic Single-Donor Trust Fund

Trust Fund (No. TF No. 073083)
EC Contract No SRSS/S2018/038

This Administration Agreement is concluded under Direct Management in the context of the Framework Agreement between the World Bank Group and the European Commission dated April 15, 2016 which sets the general conditions for this Agreement (the “Framework Agreement”). The Framework Agreement shall be applicable and form an integral part of the Administration Agreement for the Trust Fund.

1. The International Bank for Reconstruction and Development (the “Bank”) acknowledges that the European Commission (the “Donor”, and together with the Bank, the “Parties” and each a “Party”) agrees to provide the sum of five hundred thousand Euro (€ 500 000) (the “Contribution”) for the Part II Europe 2020 Programmatic Single-Donor Trust Fund, (TF No. 073083) (the “Trust Fund”) in accordance with the terms of this Administration Agreement.

The estimated total budget of the Trust Fund is five hundred thousand Euro (€ 500 000). The indicative budget set out in Annex 5 shall be used for monitoring purpose only and shall not be binding.

2. The Contribution shall be used to finance the activities set forth in the “Part II Europe 2020 Programmatic Single-Donor Trust Fund Description” attached hereto as Annex 1, and shall be administered by the Bank on behalf of the Donor in accordance with the terms of this Administration Agreement, including the “Standard Provisions” attached hereto as Annex 2 and “Governance” attached hereto as Annex 3.

Expected results of the Trust Fund and corresponding indicators (including baselines, result goals and sources of data) are set out in Annex 4.

The Implementation period will start on the date following that on which the last of the two parties sign.

3. The Donor shall deposit the Contribution in accordance with the following schedule and in the currency specified in Section 1 above (“Contribution Currency”) into such bank account designated by the Bank (each amount deposited hereinafter referred to as an “Installment”) upon submission of a payment request by the Bank:
(A) Promptly following countersignature – € 250 000
(B) € 200 000 subject to the disbursement of 70% of the preceding installment
(C) € 50 000 final payment and subject to the disbursement of 70% of the preceding installment

The period for payment of further installments shall be 60 days.
The period for payment of the balance shall be 60 days.

4. When making any deposit, the Donor shall instruct its bank to include in its deposit details information (remittance advice) field of its SWIFT deposit message, information indicating: the amount deposited, that the deposit is made by the Donor for TF No. the Part II Europe 2020 Programmatic Single-Donor Trust Fund, the Commission internal reference number and the date of the Administration Agreement, the name of the project for which the funds are intended, the name of the Commission department responsible for the Trust Fund and the date of the deposit (the “Deposit Instructions”). In addition, the Donor shall provide a copy of the Deposit Instructions to the Bank’s Accounting Trust Funds Division by e-mail sent to tfremitadvice@worldbank.org or by fax sent to +1 (202) 614-1315.

5. Except with respect to the Deposit Instructions, any notice, request or other communication to be given or made under this Administration Agreement shall be in writing and delivered by mail, fax or e-mail to the respective Party’s address specified below or at such other address as such Party notifies in writing to the other Party from time to time:

For the Bank (the “Bank Contact”):

Arup Banerji  
Regional Director  
Europe and Central Asia  
World Bank Group  
Tel: +32-2 504-0994  
Email: Abanerji@worldbank.org

For the Donor (the “Donor Contact”):

Mary McCarthy  
Director  
Structural Reform Support Service  
CHAR 10/104, 1049 Brussels  
Tel: +32-2 299-3493  
Email: Mary.Mccarthy@ec.europa.eu
6. In the event any amounts are to be returned to the Donor under this Administration Agreement, the Bank shall transfer such amounts to the Donor, unless otherwise agreed with the Bank.

7. All annexes hereto and the Framework Agreement between the World Bank Group and the European Commission constitute an integral part of this Administration Agreement, whose terms taken together shall constitute the entire agreement and understanding between the Donor and the Bank. In the event of any inconsistency, the Framework Agreement prevails over the Administration Agreement and the Administration Agreement prevails over its Annexes. Unless otherwise specified in an annex hereto, this Administration Agreement may be amended only by written amendment between the Bank and the Donor.

8. The measures taken to identify the EU as a source of financing shall be in accordance with Attachment 4 of the Framework Agreement.

9. Each of the Parties represents, by confirming its agreement below, that it is authorized to enter into this Administration Agreement and act in accordance with these terms and conditions. The Parties are requested to sign and date this Administration Agreement, and upon possession by the Bank of this fully signed Administration Agreement, this Administration Agreement shall become effective as of the date of the last signature.

INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT

By: __________________________
Name: Arup Banerji
Title: Regional Director, European Union
Date: JUIL 25, 2018

EUROPEAN UNION represented by the EUROPEAN COMMISSION

By: __________________________
Name: Mary McCarthy
Title: Director
Date: 27 JUIN 2018
PART II EUROPE 2020 PROGRAMMATIC SINGLE-DONOR TRUST FUND
DESCRIPTION

This Annex shall be applicable to and form an integral part of the Administration Agreement for the Trust Fund between the Bank and the Donor.

1. Objectives

The European Commission and the Bank share a common objective of building competitive and sustainable economies and reducing poverty and social exclusion – goals of the Europe 2020 Agenda which is built on three pillars of smart, sustainable and inclusive growth. The European Commission and the Bank concur that direct interaction is beneficial to both institutions and through them to the beneficiary countries. This applies particularly to the provision of analytical, advisory and knowledge services and technical assistance.

The European Commission has expressed an interest in ensuring that the Bank continues to provide technical assistance in the framework of the Trust Fund in furtherance of the common objective set forth above.

The sub-objectives and description of activities are:

Within the framework of the 2020 Europe programmatic trust funds, the Bank has been engaging in a comprehensive reform of the licensing regime in Greece under the ongoing “Greece Investment Licensing Reform Project” (ILRP). The licensing reform work has highlighted the need for complementary reforms of the inspections regime.

The specific objective of the activities is to support the Government of Greece to improve the efficiency and effectiveness of Greece’s inspections regime by making it risk-based and focused on improving compliance to: (i) reduce administrative and regulatory burden, (ii) increase regulatory certainty, (iii) mitigate and manage risks posed by business activities to health, environment, consumer rights and other public goods, and (iv) support a sound economic development to attract more investment and guarantee competitiveness in all sectors of the economy, with a focus on priority domains where inspection problems are particularly relevant.

2. Activities

The activities financed by the Trust Fund and which the Bank carry out will be structured into three components:

Component A. Inspection reform framework and coordination

The Bank will provide support for the development of tools, methods and guidance to implement an inspection system based on risk-based approaches as well as to improve
coordination and consistency of inspection practices and operations. The support of the Bank to the Government will include the following activities:

**A.1. Capacity building for BRDD**

As foreseen in the Law 4512/2018 (hereafter referred as the Law on Inspections), the Bank will support the Better Regulatory Delivery Directorate (BRDD), established in January 2018, which is responsible for coordination and coherence of the inspections reform, as well as continued implementation of the licensing reform.

In particular, the Bank will, throughout the implementation of this Agreement, support BRDD better define its mission in line with best international practice and build its capacity through: (i) analytics and legislative review, (ii) organizing regular meetings/discussions with relevant public administration structures, with business representatives/stakeholders and feedback collecting (workshops, conferences, panels and publication of consultation documents); (iii) "on the job training" including specific training sessions for new staff members as they get hired, (iv) seminars on specific topics (risk management, compliance promotion, etc.) and on other countries' reform experiences and (v) preparation of material summarizing best practices or producing ad hoc recommended practices for BRDD officials (e.g. guidelines, principles etc.).

**A.1. Outputs:** Training on international best practice in regulatory delivery (training material and sessions), and support to capacity building of Better Regulatory Delivery Directorate (day-to-day, "on the job" training).

**A.2. Horizontal inspection reform tools**

The Bank will support BRDD prepare general guidelines recommending how secondary "technical" legislation could be drafted (including examples of best-practice and detailed recommendations on pitfalls and solutions) to support risk-based approaches and enforcement management, through development of:

- **Guidelines for risk-criteria / risk-based planning methodologies:** The Bank will support BRDD define risk-based methodologies, depending on whether inspection planning addresses establishments or products, in accordance with the draft Law on Inspections. For establishments, the following general criteria would be followed: (i) the inherent risk of the economic activities and their procedures, (ii) the scale of the economic activity of a specific establishment, (iii) the history of compliance of the specific economic operator or the establishment, (iv) the existence of a management system (for risks) or lack thereof. For products, the following general criteria would be followed: (i) the inherent risk of the product based on the description, characteristics and intended use, its overall shelf life and warning labels and (ii) the group and number of consumers the product is intended for (with special consideration on whether the product is used by vulnerable groups or not).

- **Guidelines for check-lists:** The Bank will support BRDD in the preparation of guidance documents on the preparation of check-lists, in accordance with the Law on Inspections, to focus on key technical aspects (safety and compliance...
verification with regulations) and outcomes (safety, health, environment, etc.),

- **Guidelines for enforcement management models (EMMs):** The Bank will assist the Government in defining a strategy on enforcement management and relevant models that supports general inspectors' compliance with the principle of proportionality (risk-based) when taking enforcement decisions in a manner that: (i) promotes a framework of transparency, (ii) ensures accountability, and (iii) promotes good practices.

- **Complaints management guidelines:** The Bank will provide guidance to BRDD to help define the relevant procedures for inspectors to follow up on a given complaint (such as filing if not relevant, responding by email and incorporating as risk-management data point, or conducting a reactive inspection if issue is particularly urgent and information is credible).

- **Methodology for developing and using guidance and information tools for economic operators:** The Bank will support BRDD prepare guidance documents to provide compliance support to economic operators and the public. Among other points, the methodology would promote ways of publishing inspection checklists and guidelines to be used for self-assessment and raising awareness, as well as use of public campaigns to improve understanding of mandatory requirements by economic operators.

**A.2. Outputs:** (1) Guidelines for risk-criteria/ risk-based planning methodologies; (2) Guidelines for check-lists; (3) Guidelines for EMMs; (4) Guidelines for complaints management; (5) Methodology for developing and using guidance and information tools for economic operators.

**A.3. Baseline assessment of inspection activities burden**
The Bank will extend the scope of the report on the business survey which collected information about regulatory burden, including licensing and inspections, prepared under the ILPR, to further elaborate a comprehensive baseline report to assess licensing and inspections across businesses in the various sectors of the economy and present an overview of the private sector activities in the Greek economy (also using Eurostat and ELSTAT data upon availability).

**A.3. Outputs:** (1) Baseline report on regulatory burden of licensing and inspections.

**Component B. Inspection reform in selected domains**
The Bank will support the Government implement a modern and risk-based approach to inspections in one of the domains of supervision ("selected domain") listed in the Law on Inspections, to be selected by the Government upon initiation of project implementation. The Bank will support the Government resolve the overlap and/or gaps between inspection authorities exercising competence within the same domain. The Bank will also continue to support the Government develop tools in up to two domains that were piloted under the ILRP: food safety and/or fire safety ("pilot domains").
B.1. Inspections procedures and tools

The Bank will support the Government develop and prepare tools, procedures, documents and proposed draft secondary legislation for the selected domain and will continue to support the Government develop tools in the pilot domains.

- **Risk-based planning methodology:** The Bank will provide assistance to the Government in guiding relevant inspection authority(ies) in the selected domain on how to prepare inspections planning and post-inspection follow-up. This support will specifically assist said inspection authorities (i) create classification criteria for establishments, (ii) effectively assign risk-based classification to establishments and, on this basis, (iii) develop a system to match the list of risk-ranked establishments with resources and plan.

- **Enforcement Management Model:** The Bank will support the Government design an Enforcement Management Model (EMM) for the selected domain and for one of the pilot domains to promote proper implementation of legislation and uniformity. This support will specifically help the Government identify and address the key elements to be taken into consideration by inspectors during visits and when taking decisions. Furthermore, the World Bank will support the Government select criteria to apply when enforcing administrative sanctions and fines that, together with all inspection results, are to be recorded in an integrated information system as part of the activities described in Component C.

- **Selected check-lists on requirements (for specific economic activities in the selected domain and pilot domains):** The Bank will support the relevant inspection authority(ies) in the preparation of check-lists selected based on review of international practices, but also considering local legislation and experience. The check lists will be piloted in inspections and divided into categories of importance (e.g. “critical”, “average” and “secondary”). The check-lists will be linked to risk-based enforcements (namely EMMS), so that the assignment of the scores and/or thresholds ideally fit and result in good practices.

- **Guidance:** The Bank will support preparing and publishing one guidance document for the selected domain on compliance with requirements for specific economic activities. The guidance will lay out the advantages of the new proposed approaches, as well as technical guidance, advice and information to the operators and the public involved (in the relevant economic activities).

- **Complaints management guidelines:** The Bank will provide guidance to competent institutions within the selected domains and within one of the pilot domains on benefits of adopting a complaints management system, and on (i) the relevant procedures, (ii) the details that the complainant must provide, and (iii) the specific criteria to be taken into consideration.

- **Identification of overlaps and other conflicts of competences in inspections:** The Bank will support the Government in the identification of overlaps, duplications, “grey areas” and “gaps” in competences in inspections, focusing on key economic
sectors which are particularly relevant for the inspections in the selected domain. This will be accompanied with recommendations for revision of functions to ensure increased efficiency and effectiveness.

**B.1. Outputs:** for the selected regulatory domain, the project will support the development of (1) Risk-based classification of the establishments covered; (2) System matching the list of establishments with resources and plan; (3) Enforcement management model; (4) Comprehensive set of check-lists; (5) Guidance documents for specific economic activities; (6) Complaints management guidelines; (7) Review of overlaps and conflicts of competences, and recommendations. For the selected pilot domain(s) the project will support the development of (3), (4) and (6) above.

**B.2. Inspectors’ training**
The Bank will carry out up to 2 targeted training sessions for inspectors working in the selected domain and/or pilot domain(s) to introduce new ways and tools to carry out inspection work (in groups of 20 to 30 trainees). This will be based on an assessment of needs in terms of technical skills and core skills (risk management, information technology etc.). The Bank will also support the delivery of “training of trainers” (managers and core staff) that can serve as mentors for others in a selected institution.

**B.2. Outputs:** for the selected regulatory domain and/or pilot domain(s), the project will: (1) Produce training materials (e.g. PPT presentations); (2) Provide training sessions for inspectors and/or inspectors trainers (in order to spread training across local authorities).

**B.3. Private sector (outreach & consultation)**
The Bank will support the Government boost participation of the private sector into the inspections reform, through increased consultations, and activities to promote buy-in from businesses that may be affected by said reforms. This will include supporting the Government prepare a communication – outreach strategy, organize seminars and workshops with business associations and conduct focus groups with businesses of different types, sizes and sectors to gather their feedback and input on inspection reforms. It will also consist of activities and events aimed at disseminating information to businesses on new procedures and compliance requirements in the selected domain and in one of the pilot domains.

**B.3. Outputs:** (1) Communication-outreach strategy; (2) Awareness raising events (3 seminars-workshops/ focus groups and 2 events disseminating information to businesses on new procedures of compliance in the piloted areas).

**Component C. Inspections information technology**
The Bank will provide advisory services, including IT expertise and guidance, to support the Government in the development of an ‘IT solution for inspections’ to pilot the new inspection tools and techniques (produced under Component B).

**C.1. “Interim” inspections IT**
The Bank will provide IT expertise and guidance to assist the Government in developing an “interim” IT for inspections to pilot the new inspection tools and techniques (e.g. risk
indicators and assessment, inspection checklists). This will include presentation of best practice examples and provision of technical advice in: a) developing an initial registry of inspection subjects and objects using available data from the existing pilot notification software and administrative data (e.g. GEMI Business Registry, Tax Registry) and, b) integrating inspection checklists, risk indicators and risk models (produced under Component B) to be piloted in the “interim” inspection IT.

C.1. Outputs: (1) Presentation of international best practice examples in IT; (2) Technical specifications for “interim” IT for inspections.

C.2. Information Technology Training

The Bank will support the Government organize training and outreach activities for use of the “interim” inspections IT and develop training manuals and training plans.

C.2. Outputs: (1) Training sessions; (2) Training manuals and plans.
Indicative Timeline of Milestones and Outputs

<table>
<thead>
<tr>
<th>Phase 1</th>
<th>Comp A: Inspections reform framework and coordination</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.1</td>
<td>Training on international best practice in regulatory delivery - support to capacity building of BRDD</td>
</tr>
<tr>
<td>A.2</td>
<td>Horizontal inspection reform tools</td>
</tr>
<tr>
<td></td>
<td>(i) Guidelines for risk-criteria / risk-based planning methodologies</td>
</tr>
<tr>
<td></td>
<td>(ii) Guidelines for check-lists</td>
</tr>
<tr>
<td></td>
<td>(iii) Guidelines for enforcement management models (EMMs)</td>
</tr>
<tr>
<td></td>
<td>(iv) Guidelines for complaints management</td>
</tr>
<tr>
<td></td>
<td>(v) Methodology for developing &amp; using guidance &amp; information tools for economic operators</td>
</tr>
<tr>
<td></td>
<td>Baseline report on regulatory burden of licensing and inspections</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comp B: Inspection reforms in selected domains</th>
</tr>
</thead>
<tbody>
<tr>
<td>B.1</td>
</tr>
<tr>
<td>Inspections procedures and tools</td>
</tr>
<tr>
<td>(i) Risk-based classification system for establishments</td>
</tr>
<tr>
<td>(ii) System matching the list of establishments with resources and plan</td>
</tr>
<tr>
<td>(iii) Enforcement Management Model (applicable also for the pilot domain)</td>
</tr>
<tr>
<td>(iv) Set of check-lists (applicable also for the pilot domain)</td>
</tr>
<tr>
<td>(v) Guidance documents for specific economic activities</td>
</tr>
<tr>
<td>(vi) Complaints management guidelines (applicable also for the pilot domain)</td>
</tr>
<tr>
<td>(vii) Review of overlaps and conflicts of competences</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comp C: Inspections Information Technology</th>
</tr>
</thead>
<tbody>
<tr>
<td>C.1</td>
</tr>
<tr>
<td>Presentation of international best practice examples in IT / Technical specifications for &quot;internet&quot; IT on inspections</td>
</tr>
</tbody>
</table>

| C.2 | Training sessions / training manuals and plans |

<table>
<thead>
<tr>
<th>2018</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q3</td>
<td>Q4</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
3. **Eligible Expenditures**

3.1 For Bank-executed activities, the Trust Fund funds may be used to finance:

(a) Staff and individual consultant services;
(b) Cost of travel;
(c) Cost of training and workshops; and
(d) Other services including translation.

4. **Taxes**

4.1 The foregoing activities and categories of expenditures may include the financing of taxes in accordance with the Bank’s applicable policies and procedures.

5. **Program Criteria**

5.1 Activities are to be financed in accordance with the following program criteria:

The Trust Fund is established to enable the European Commission and the Bank to continue to collaborate and exchange experience and expertise on a number of themes under all three pillars of the Europe 2020 Agenda of smart, sustainable and inclusive growth. The express purpose of this Trust Fund is to allow the European Commission to avail itself of the Bank’s technical assistance and analytical and policy capacity for the purpose of pursuing the goals of Europe 2020. The three pillars of Europe 2020 are broadly in line with the objectives and strategies adopted in the Europe and Central Asia Region of the World Bank Group. All activities that are in pursuance of these three pillars are eligible to be financed and implemented under this Trust Fund.
ANNEX 2

STANDARD PROVISIONS

This Annex shall be applicable to and form an integral part of the Administration Agreement for the Trust Fund between the Bank and the Donor.

1. **Administration of the Contributions**

1.1 The Bank shall be responsible only for performing those functions specifically set forth in this Administration Agreement and shall not be subject to any other duties or responsibilities to the Donor, including, without limitation, any duties or obligations that might otherwise apply to a fiduciary or trustee under general principles of trust or fiduciary law. Nothing in this Administration Agreement shall be considered a waiver of any privileges or immunities of the Bank under its Articles of Agreement or any applicable law, all of which are expressly reserved.

1.2 The Donor's Contribution shall be administered in accordance with the Bank's applicable policies and procedures, as the same may be amended from time to time, including its procurement, financial management, disbursement and safeguard policies, its framework to prevent and combat fraud and corruption and its screening procedures to prevent the use of Bank resources to finance terrorist activity, in line with the Bank's obligations to give effect to the relevant decisions of the Security Council taken under Chapter VII of the Charter of the United Nations. The Donor acknowledges that this provision does not create any obligations of the Bank under the anti-terrorist financing and asset control laws, regulations, rules and executive orders of an individual member country that may apply to the Donor.

2. **Management of the Contributions**

2.1 The funds deposited in the Trust Fund shall be accounted for as a single trust fund and shall be kept separate and apart from the funds of the Bank. The funds deposited in the Trust Fund may be commingled with other trust fund assets maintained by the Bank. The Bank, in its capacity as trustee, has legal title to the funds deposited in the Trust Fund.

2.2 The currency in which the funds in the Trust Fund shall be held is Euro (the "Holding Currency").

2.3 The Donor agrees to deposit its Contributions in the Contribution Currency stated in the Administration Agreements. In the case of deposits received in a Contribution Currency other than the Holding Currency, promptly upon the receipt of such amounts and the accompanying Deposit Instructions, the Bank shall convert such amounts into the Holding Currency at the exchange rate obtained by the Bank on the date of the conversion. Where deposits prove to be insufficient to complete activities as a result of
exchange rate fluctuations, neither the Bank nor the Donor shall bear any responsibility for providing any additional financing.

2.4 The funds deposited in the Trust Fund may be freely exchanged by the Bank into other currencies as may facilitate their disbursement at the exchange rate obtained by the Bank on the date of the conversion.

2.5 The Bank shall invest and reinvest the funds deposited in the Trust Fund pending their disbursement in accordance with the Bank's applicable policies and procedures for the investment of trust funds administered by the Bank. The Bank shall transfer all income from such investment to the Donor's applicable donor balance account with the Bank.

3. **Trust Fund Fees and Costs**

3.1 The Bank shall deduct and retain for its own account, as a deduction from each Instalment, an amount equal to five percent (5%) per Instalment as an administrative fee for the Trust Fund.

3.2 The Donor acknowledges and agrees that the percentage deductions for fees in this Trust Fund Fees and Costs section are estimated on the basis of anticipated Contributions. If actual Contributions significantly differ from what was originally anticipated at the time of signature of the first Administration Agreement, or if other circumstances affecting Trust Fund fees or costs change, the Bank reserves the right to request a change to the terms of this Trust Fund Fees and Costs section, which would be effectuated by amendments made to the Administration Agreements of the Donor and which would thereafter be applicable to all new Contributions that are provided either as amendments to supplement existing Administration Agreements or from new Administration Agreements.

4. **Accounting and Financial Reporting**

4.1 The Bank shall maintain separate records and ledger accounts in respect of the funds deposited in the Trust Fund and disbursements made therefrom.

4.2 The Bank shall furnish to the Donor current financial information relating to receipts, disbursements and fund balance in the Holding Currency with respect to the Contributions via the World Bank's Trust Funds Development Partner Center secure website. Within six (6) months after all commitments and liabilities under the Trust Fund have been satisfied and the Trust Fund has been closed, the final financial information relating to receipts, disbursements and fund balance in the Holding Currency with respect to the Contributions shall be made available to the Donor via the World Bank's Trust Funds Development Partner Center secure website.

4.3 The Bank shall provide to the Donor via the World Bank's Trust Fund Development Partner Center secure website, within six (6) months following the end of
each Bank fiscal year, an annual single audit report, comprising (i) a management assertion together with an attestation from the Bank’s external auditors concerning the adequacy of internal control over cash-based financial reporting for all cash-based trust funds as a whole; and (ii) a combined financial statement for all cash-based trust funds together with the Bank’s external auditor’s opinion thereon. The cost of the single audit shall be borne by the Bank.

4.4 If the Donor wishes to request, on an exceptional basis, a financial statement audit by the Bank’s external auditors of the Trust Fund, the Donor and the Bank shall first consult as to whether such an external audit is necessary. The Bank and the Donor shall agree on the appropriate scope and terms of reference of such audit. Following agreement on the scope and terms of reference, the Bank shall arrange for such external audit. The costs of any such audit, including the internal costs of the Bank with respect to such audit, shall be borne by the requesting Donor.

5. **Progress Reporting**

5.1 The Bank shall provide the Donor with quarterly reports on the progress of activities financed by the Contributions. Within six (6) months of the End Disbursement Date (as defined below), the Bank shall furnish to the Donor a final report on the activities financed by the Trust Fund.

5.2 The Donor may review or evaluate activities financed by the Trust Fund at any time up to six (6) months following the End Disbursement Date. The Donor and the Bank shall agree on the scope and conduct of such review or evaluation, and the Bank shall provide all relevant information within the limits of the Bank’s applicable policies and procedures. All associated costs, including any costs incurred by the Bank, shall be borne by the Donor. It is understood that any such review or evaluation will not constitute a financial, compliance or other audit of the Trust Fund.

6. **Disbursement; Cancellation; Refund**

6.1 It is expected that the funds deposited in the Trust Fund will be fully disbursed by the Bank by April 30, 2020 (the “End Disbursement Date”). The Bank shall only disburse funds deposited in the Trust Fund for the purposes of this Administration Agreement (other than returns to Donor) after such date to the extent such date is changed in accordance with amendments made to the Administration Agreement(s) of the Donor. Following the End Disbursement Date, the Bank shall return any remaining balance of the Trust Fund to the Donor in the Holding Currency in the manner specified in its respective Administration Agreement on a pro rata basis with regard to the total funds deposited in the Trust Fund by such Donor relative to the total funds deposited in the Trust Fund by the Donor, all calculated as Holding Currency amounts.

6.2 The Donor may cancel all or part of such Donor’s pro rata share/contribution, and the Bank may cancel all or any Donor’s pro rata share/contribution, upon three (3) months’ prior written notice, of any Contributions (paid and not yet paid) that are not
committed pursuant to any agreements entered into between the Bank and any consultants and/or other third parties for the purposes of this Administration Agreement, including any Grant Agreements, prior to the receipt of such notice. In the event of a cancellation, the Bank shall return to the Donor its pro rata shares in the Holding Currency as specified in the Administration Agreement unless otherwise agreed between the Bank and the Donor.

7. **Disclosure; Dispute Resolution**

7.1 The Bank shall disclose the Administration Agreements and related information on this Trust Fund in accordance with the Bank's Policy on Access to Information. By entering into Administration Agreements, the Donor consents to such disclosure of their respective Administration Agreements and such related information.

7.2 The Donor and the Bank shall use their best efforts to amicably settle any dispute, controversy, or claim arising out of or relating to the Administration Agreements.
ANNEX 3

GOVERNANCE OF THE ACTIVITIES SET FORTH IN SECTION 2 OF ANNEX 1 TO THIS ADMINISTRATION AGREEMENT

This Annex shall be applicable to and form an integral part of the Administration Agreement for the Trust Fund between the Bank and the Donor.

Working Modalities

The Bank shall be in charge of the implementation of the activities and shall consult with the Structural Reform Support Service (SRSS) regularly.

SRSS shall take all appropriate measures to facilitate the Bank work in the performance of the activities, including, as needed, facilitating contacts with the Greek authorities.

The activities shall be undertaken in close collaboration with the SRSS, and the Government of Greece.

In order to facilitate the implementation of the project, the SRSS shall be responsible for involving other EU Commission services, where appropriate. The SRSS shall also provide support to ensuring the appropriate involvement of the Greek authorities for the smooth execution of the activities by the Bank. The SRSS, when legally possible, shall provide the Bank with relevant documents, reports and findings, resulting from other technical assistance work streams the SRSS is or has been involved in.

The Bank and SRSS shall have regular exchanges, at least on a quarterly basis, on the progress of the project, on the work plan or schedule of project activities for the following month(s) including missions. A Representative of the SRSS shall be invited to attend all missions and all pertinent events or activities. To facilitate the organization and efficiency of such missions, events and activities, the Bank shall share with the SRSS in a timely manner the relevant documents.

Priorities and choices to be made in the planning of the activities will be discussed and consulted between the Bank and SRSS.

It is expected that the Greek authorities shall be the national contact point for the activities, and shall coordinate the necessary coordination mechanisms within the Greek authorities, the capital markets sector, and other relevant national stakeholders. To this end, the Government of Greece shall establish a Project Management Team, composed of relevant Government staff.

It is expected that the Bank shall consult and cooperate with the Project Management Team at all major stages of the activities to be implemented. It is expected that the Greek authorities shall provide input for the analysis of the Bank’s comment on the work plan of the Project, review draft outputs and provide detailed comments.
It is expected that the outputs resulting from the activities shall be delivered by the Bank to the Greek authorities and the SRSS directly. The Bank shall share with the SRSS draft outputs. The SRSS may provide comments that the Bank may take into account. The Bank shall inform the SRSS of those cases where the SRSS feedback was not taken into consideration.

The Government of Greece shall be solely responsible for the implementation of the recommendations in the report(s). It is expected that the Government of Greece, SRSS and Bank shall consult each other prior to the publication of the final report endorsed by the Greek authorities.

The Bank shall notify the SRSS without delay on any circumstances likely to adversely affect the implementation and management of the Action or to significantly delay or jeopardize the performance of the activities or the expected outputs and outcomes.

The Bank shall carry out the visibility activities agreed between the Bank and the SRSS in the Visibility Note, which may be updated from time to time by the parties, in line with Article 9 and Attachment 4 of the Framework Agreement.

Bank team composition:

The Bank shall, in its sole discretion, determine the composition of the staff (including staff holding consultant appointments) assigned to perform the activities under this Agreement. The Bank team shall be managed by a Bank Task Team Leader with relevant experience, drawing on the expertise of the World Bank Group staff with extensive experience in: public sector administration, international public law, development operations and program management/assistance. The Bank team will include the following competencies:

(a) In-depth knowledge of Europe's procedures and the EU regulatory framework, especially for Trust fund-financed activity;
(b) Ability to assess the treasury and budget management, accounting and IT systems architecture as part of the overall Public Financial Management System and propose recommendations for further development in the EU context;
(c) Ability to produce high-quality written outputs; and
(d) Project management, economic, and other skills that will be considered necessary for the execution of the activities.

Payment Requests

Requests for payments related to the activities set forth in Section 2.1 of Annex I to this Administration Agreement will be sent by the World Bank to the Commission with the reference EC Contract No SRSS/S2018/038 and shall be addressed to:

Mr Giuseppe Menchi
Structural Reform Support Service
European Commission
Office CHAR 10/040
B-1049 Brussels
## Indicative Results Indicators for the Annex 1 Activities

<table>
<thead>
<tr>
<th>Expected Results (logic of intervention)</th>
<th>Indicators</th>
<th>Baselines</th>
<th>Result goals</th>
<th>Sources of data</th>
<th>Assumptions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Impact</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reduced burden and uncertainty for existing as well as new businesses</td>
<td>Aggregate administrative burden from inspections</td>
<td>TBD (survey data available, analysis ongoing)</td>
<td>10% reduction</td>
<td>Representative business survey</td>
<td>Reform is effectively implemented by GOG</td>
</tr>
<tr>
<td>Improved or maintained mitigation of risks posed by business activities</td>
<td>Investors’ confidence level regarding regulations</td>
<td></td>
<td></td>
<td>Business survey, focus groups</td>
<td>Investor confidence level not negatively influenced by other events</td>
</tr>
<tr>
<td></td>
<td>Key performance indicators for selected inspection domains (e.g. food-borne diseases, fatalities from fires etc.)</td>
<td>TBD based on available official data</td>
<td>Targets TBD</td>
<td>Based on publicly available data</td>
<td>No major external event leading to worsening of indicators independently of regulatory effectiveness</td>
</tr>
<tr>
<td><strong>Outcomes</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Improved coordination and consistency of inspections</td>
<td>“Horizontal” guidelines adopted, coordination unit in place</td>
<td>N/A</td>
<td>TBD</td>
<td>Direct verification</td>
<td>Coordination unit effectively set-up and empowered</td>
</tr>
<tr>
<td></td>
<td>Risk-based, risk-focused, risk-proportional inspections in selected domains</td>
<td>Risk-based planning, check-lists etc. adopted in selected areas</td>
<td></td>
<td>Improve d practice s in 1-3 domains (one newly selected domain and 1-2 pilot domains)</td>
<td>Compliance of administrations with framework law</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Effective implementation in selected priority areas</td>
</tr>
<tr>
<td><strong>Outputs</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A.1</td>
<td>Training on international best practice in regulatory delivery (training material and sessions) and support to capacity building of BRDD</td>
<td>0</td>
<td>3</td>
<td>Direct verification</td>
<td>Effective coordination and reform implementation mechanism</td>
</tr>
<tr>
<td></td>
<td>Guidelines for risk criteria/risk-based</td>
<td>0</td>
<td>1</td>
<td>Direct verification</td>
<td>Adequate engagement of all GoG structures relevant to the</td>
</tr>
<tr>
<td>Planning methodologies</td>
<td>Guidelines for checklists</td>
<td>Guidelines for EMMs</td>
<td>Guidelines for complaints management</td>
<td>Methodology for developing and using guidance and information tools for economic operators</td>
<td></td>
</tr>
<tr>
<td>-------------------------</td>
<td>---------------------------</td>
<td>--------------------</td>
<td>-------------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>A.3 Baseline report on regulatory burden of licensing and inspections</td>
<td>0</td>
<td>1</td>
<td></td>
<td>Survey</td>
<td></td>
</tr>
<tr>
<td>B.1 Risk-based classification system for establishments</td>
<td>0</td>
<td></td>
<td></td>
<td>Done for 1-3 domains (1 newly selected domain and 1-2 pilot domains)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>System matching the list of establishments with resources and plan</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Enforcement management model</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Set of check-lists</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Guidance documents for specific economic activities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Complaints management guidelines</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Review of overlaps and conflicts of competences</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>For the pilot domain: Enforcement management model</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Set of check-lists</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Complaints management guidelines</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B.2 Training material</td>
<td>N/A</td>
<td>At least 80 inspectors trained</td>
<td></td>
<td>Direct verification (feedback forms etc.)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Training sessions for inspectors and/or inspectors trainers</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B.3 Communication-outreach strategy</td>
<td>N/A</td>
<td>TBD</td>
<td></td>
<td>Direct verification</td>
<td></td>
</tr>
<tr>
<td>Event Type</td>
<td>C.1</td>
<td>C.2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------------------</td>
<td>---------------------------</td>
<td>---------------------------</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Awareness raising events (3 seminars-workshops/ focus groups and 2 events disseminating information to businesses on new procedures of compliance in the piloted areas)</td>
<td>Presentation of international best practice examples in IT Technical specifications for &quot;interim&quot; IT for inspections</td>
<td>Training sessions Training manuals and plans</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>TBD</td>
<td>TBD</td>
<td>0 1</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>TBD</td>
<td>Direct verification</td>
<td>1 1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>