



TERMS OF REFERENCES
FOR THE FINANCIAL AUDIT OF THE PROJET
« CHILD VICTIMS OF TRAFFICKING: ACCESS TO PROTECTION AND
INFORMATION BASED ON THEIR SPECIFIC NEEDS DURING CRIMINAL
INVESTIGATION AND PROCEEDINGS – CAPISCE»

The following are the terms of reference ('ToR') on which **ECPAT France** agrees to engage an Auditor or an Audit firm to perform an audit and to report in connection with a grant contract financed by the Directorate-General for Justice and Consumers of the European Commission (**DG JUST**) and named "CAPISCE", with the number 847371 — CAPISCE — JUST-AG-2018/JUST-JACC-AG-2018. DG JUST is not a party to this agreement.

PRESENTATION OF ECPAT FRANCE

Founded in 1997, ECPAT France is a French NGO, member of the ECPAT International network whose mandate is to fight, in France and internationally, against the sexual exploitation of children. The aim of the association is also to promote the rights of the child and to combat all forms of violence and exploitation of children and young people under the age of 25, including trafficking whatever the form of exploitation. In line with the network's vision, ECPAT France wishes to realize the right of all children to live free from all forms of sexual exploitation. The association undertakes advocacy actions with policy makers and economic actors to ensure that children's rights are effective. It implements or supports actions to prevent violence against children and young people, strengthen protection systems and promote the recovery and reintegration of children and young people who are victims of violence.

Website: <https://ecpat-france.fr/>

PRESENTATION OF THE PROJECT

The CAPISCE project's objectives is to strengthen the application of the EU criminal law in the area of the rights of child victims of trafficking (VoT) in Europe on the grounds that VoT should have their rights to understand and to be understood respected and VoT should benefit from an adequate protection during investigation and criminal proceedings including a protection of their privacy and the right to avoid contact with offenders.

Presentation of the coordination and the partners

The project is coordinated by ECPAT France, with Acting for Life for the financial monitoring. A partnership agreement between ECPAT France and Acting for Life is signed to determine the time and meetings in France and abroad spent by the Finance officer.

The project is implemented with four other European organisations from Belgium, the Netherlands, and Italy. The partners are in charge of national activities (creation of training modules for interpreters, meetings with professionals working with victims of THB, elaboration of a national research report, workshops) and international activities in Europe (elaboration of a European research report, meetings at European level). All the partners signed partnership agreements with ECPAT France.

- ECPAT Belgium (Belgium)
- Stichting DCI-ECPAT (the Netherlands)

- ECPAT Italia Onlus (Italy)
- EULITA (Belgium)

The budget distribution between the different partners is described in annex 1.

DESCRIPTION OF THE AUDIT MISSION

1. Subject of the Engagement

The subject of this engagement is the financial audit of the CAPISCE project in connection with the Final Financial Report for the period covering 01/10/2019 to 30/09/2021.

2. Expected results

The Auditor plans the work so that an effective expenditure verification can be performed with the procedures listed in Annex 2A and 2B. At the end of the Audit mission, the Auditor will an **executive summary** that will allow ECPAT France to elaborate a consolidated financial report. The executive summary will be sent to ECPAT France by email.

The evidence to be used for performing the procedures in Annex 2A and 2B is all financial and non-financial information which makes it possible to examine the expenditure claimed by ECPAT France in the Financial Report (contract obligations, budget, control of the expenditures and the accountability, exchange rate used, etc.).

The Auditor or the firm will deliver **an audit report in English, including a ‘Certificate on the financial statement’ (see annex 3)** and on the consolidated financial report made by ECPAT France for DG JUST, in three original copies and one electronic copy. A model of the *Certificate on the financial statement* is annexed to these ToR. the report will provide comments on each control made as well as the amount of the declared ineligible costs.

3. Activities to realize

Annex 1 provides information about the Grant Agreement. Annex 2 provides the expected minimal procedures. Annex 3 is a model of the Certificate on the financial statement.

In order to perform the audit mission, the Auditor must consider the following elements:

- Option A: The audit of the expenditures of the six European partners will be done with the original supporting documents and/or electronic copies, and will take place in the office of ECPAT France in Le Bourget, France.
- Option B: The audit of the expenditures of the six European partners will be done with the original supporting documents and will take place in the office of each organization: in Antwerp for EULITA, in Brussels for ECPAT Belgium, in Leiden for Stichting DCI-ECPAT, in Rome for ECPAT Italia Onlus, in Le Bourget for ECPAT France and Acting for Life.

In his/her methodological and financial proposition, the Auditor can take into account both Option A and Option B or only one of the option. ECPAT France strongly recommends to make two proposals.

4. Profile

The Auditor confirms that he/she meets at least one of the following conditions:

- The Auditor and/or the firm is a member of a national accounting or auditing body or institution which in turn is member of the International Federation of Accountants (IFAC).
- The Auditor and/or the firm is a member of a national accounting or auditing body or institution. Although this organisation is not member of the IFAC, the Auditor commits him/herself to undertake this engagement in accordance with the IFAC standards and ethics set out in these ToR.

- The Auditor and/or the firm is registered as a statutory auditor in the public register of a public oversight body in an EU member state in accordance with the principles of public oversight set out in Directive 2006/43/EC of the European Parliament and of the Council (this applies to auditors and audit firms based in an EU member state¹).
- The Auditor and/or the firm is registered as a statutory auditor in the public register of a public oversight body in a third country and this register is subject to principles of public oversight as set out in the legislation of the country concerned (this applies to auditors and audit firms based in a third country).

The auditor must be fluent in English (written and spoken).

5. Standards and Ethics

The Auditor shall undertake this engagement in accordance with Directive 2006/43/CE of the European Parliament and of the Council.

6. Other Terms

The auditor or the firm will provide a technical and financial proposition, detailing all the costs and the organisation of the audit of the final financial report of the CAPISCE project.

The fee will include miscellaneous expenses and disbursement. The maximum available budget for this engagement is 9 000 Euros (including tax and VAT).

Schedule

▪ Application submission deadline	Before February 25 th , 2020 at 18h (time in Paris)
▪ Selection notification	March 6 th , 2020
▪ Meeting with the selected auditor or firm and ECPAT France	In March/April 2020
▪ Audit period	Starting date November 2 nd , 2021 Ending date : November 16 th , 2021
▪ Delivery of the Audit report and the executive summary including the main conclusions of the audit report and the main recommendations. (All of these documents will be written in English)	By November 23 rd , 2021, at the latest.

7. Terms of the Application submission

The auditors or the firms wishing to apply will use in their application the elements mentioned in these ToR and their annexes, as well as their own expertise.

The auditors or the firms wishing to apply will send their application by email, with the following email subject: « **Audit CAPISCE 2019/2021** » including:

- A presentation of the firm
- A proof document of their IFAC membership
- The methodological and financial proposition, with an implementation schedule
- The financial proposition will be detailed as follow: Person/day X number of days and the expected travels.

¹ Directive 2006/43 of the European Parliament and of the Council of 147 May 2006 on statutory audits of annual accounts and consolidated, amending Council Directives 78/660/EEC and 83/349/EEC and repealing Council Directive 84/253 EEC.

- The resume of the auditor or of the team members
- The references in connection with this mission

Evaluation Grid:

Application	/5
Presentation of the application	/5
Administrative Analysis/Structure	/15
Auditor(s)' profile	/5
Previous audit experience with similar projects – knowledge of the procedures and rules of institutional funders	/6
Previous audit experience with similar projects – knowledge of the funder	/2
Experience with ECPAT France and/or the project's partners	/2
Technical Analysis	/15
Understanding of the ToR	/4
Methodology	/7
Planning	/4
Financial Analysis	/15
Budget presentation & clarity	/5
Relevance et price competitiveness	/10
Total	/50

Submission and deadline:

Applications shall be sent to the project's Finance Officer before:

Tuesday, February 25th 2020 at 18h (Time of Paris)

at the following email :

acoin@acting-for-life.org

ANNEXES

Annex 1	Information about the Grand Agreement
Annex 2	Listing of specific procedures to be performed
Annex 3	Model of the Certificate on the financial statement

Annex 1 Information about the Grant Agreement

Grant Agreement Information	
Reference number and date of the Grant Contract	847371 — CAPISCE — JUST-AG-2018/JUST-JACC-AG-2018 29/05/2019
Grant Agreement Title	Child victims of trafficking : Access to Protection and Information based on their Specific needs during Criminal investigation and proceedings – CAPISCE
Country	France, Belgium, the Netherlands, Italy
Beneficiary	ECPAT France 40 avenue de l'Europe – 93350 Le Bourget Aéroport FRANCE
Starting date of the action	October 1 st , 2019
Ending date of the action	September 30 th , 2021
Total cost of the action	604 591.72 euros
Grant maximum amount from DG JUST for the action	483 673.38 euros (80% of the grant)

Budget distribution and place of the audit:

Partner	Place of the audit	Forecast Budget (in Euros)
ECPAT France	Le Bourget - France	203 065.67
Acting for Life	Le Bourget - France	30 270.30
EULITA	Antwerp – Belgium <i>or</i> Le Bourget - France	119 939.30
ECPAT Italia Onlus	Rome - Italy <i>or</i> Le Bourget - France	91 671.18
Stichting DCI-ECPAT	Leiden – the Netherlands <i>or</i> Le Bourget - France	81 856.07
ECPAT Belgium	Brussels - Belgium <i>or</i> Le Bourget - France	88 792.21

Annex 2A Listing of Specific Procedures to be performed

At the end of executing the procedures 2A and 2B, the auditor will inform the list of procedures executed. The auditor will also inform the added procedures executed during the audit.

1. GENERAL PROCEDURES

Terms and Conditions of the Grant Agreement

The Auditor obtains an understanding of the terms and conditions of the Grant Contract by reviewing the Grant Contract and its annexes and other relevant information, and by inquiry of the beneficiaries. The Auditor obtains a copy of the original Grant Agreement with its annexes. The Auditor obtains and reviews the Financial Reports of the beneficiaries

Financial Report for the Grant Agreement

The Auditor verifies that the Financial Report complies with the following conditions of the Grant Agreement and its annexes:

- The Financial Report must conform to the model set by DG JUST;
- The Financial Report should cover the Action as a whole, regardless of which part of it is financed by DG JUST;
- The Financial Report should be drawn up in the language of the Grant Agreement.

Rules for Accounting and Record keeping

The Auditor examines – when performing the procedures listed in this Annex - whether the Beneficiary has complied with the following rules for accounting and record keeping:

- The accounts kept by the Beneficiary for the implementation of the Action must be accurate and up-to-date;
- The accounts and expenditure relating to the Action must be easily identifiable and verifiable;

The Auditor reconciles the information in the Financial Report to the Beneficiary's accounting system and records (e.g. trial balance, general ledger accounts, sub ledgers etc.)

Exchange Rates

The Auditor verifies that amounts of expenditure incurred in a currency other than the Euro have been converted at the exchange rate published in the Official Journal of the European Union for the months covered by the Financial Report.

2. PROCEDURES TO VERIFY CONFORMITY OF EXPENDITURE WITH THE BUDGET AND ANALYTICAL REVIEW

Budget of the Grant Agreement

The Auditor carries out an analytical review of the expenditure headings in the Financial Report.

The Auditor verifies that the budget in the Financial Report corresponds with the budget of the Grant Agreement (authenticity and authorisation of the initial budget) and that the expenditure incurred was indicated in the budget of the Grant Agreement.

Amendments to the Budget of the Grant Agreement

The Auditor verifies whether there have been amendments to the budget of the Grant Contract. Where this is the case the Auditor verifies that the Beneficiary has requested an amendment to budget and obtained an addendum to the Grant Agreement if such an addendum was required.

3. PROCEDURES TO VERIFY SELECTED EXPENDITURE

Eligibility of Costs

The Auditor verifies, for each expenditure item selected, the eligibility criteria set out below.

(1) Costs actually incurred

The Auditor verifies that the expenditure for a selected item was actually incurred by and pertains to the Beneficiary. For this purpose the Auditor examines supporting documents (e.g. invoices, contracts) and proof of payment. The Auditor also examines proof of work done, goods received or services rendered and he/she verifies the existence of assets if applicable.

The costs incurred during the implementation period of the action that have not been paid at the end of the implementation period of the action could be accepted as eligible direct costs, if 1) records exist (order form, invoice) for the goods or services delivered during the implementation period of the action, 2) if the final direct costs are known, and if 3) these direct costs are recorded in the final financial report. The Auditor verifies that all of these categories of costs have been sold at the time of the audit verification.

(2) Cut-off – Implementation period

The Auditor verifies that the expenditure for a selected item was incurred during the implementation period of the Action.

(3) Budget

The Auditor verifies that the expenditure for a selected item was indicated in the Action budget.

(4) Necessary

The Auditor verifies whether it is plausible that the expenditure for a selected item was necessary for the implementation of the Action and that it had to be incurred for the contracted activities of the Action by examining the nature of the expenditure with supporting documents.

(5) Records

The Auditor verifies that expenditure for a selected item is recorded in the Beneficiary's accounting system and was recorded in accordance with the applicable accounting standards of the country where the Beneficiary is established and the Beneficiary's usual cost accounting practices.

(6) Justified

The Auditor verifies that expenditure for a selected item is substantiated by evidence (see section 1 of Annex 2B, Guidelines for Specific Procedures to be performed).

(7) Applicable Law

The Auditor verifies that the expenditure comply with the applicable fiscal law and, when applicable, the law regarding social security (i.e. social security contribution, employer's contribution, etc.)

(8) Valuation

The Auditor verifies that the monetary value of a selected expenditure item agrees with underlying documents (e.g. invoices, salary statements) and that correct exchange rates are used where applicable.

(9) Classification

The Auditor examines the nature of the expenditure for a selected item and verifies that the expenditure item has been classified under the correct (sub)heading of the Financial Report.

(10) Compliance with Procurement

Where applicable the Auditor examines which procurement rules apply for a certain expenditure (sub)heading, a class of expenditure items or an expenditure item. These rules must comply with the Articles 6 and 9 of the Grant Agreement.

3.2. Eligibility of Direct Costs

If the expenditure for a selected item is recorded under one of the direct costs headings of the Financial Report, the Auditor verifies that this type of expenditure is covered by the direct costs by examining the nature of the expenditure items concerned

3.3. Administrative Costs

The Auditor verifies that the indirect costs to cover the administrative overheads do not exceed 7% of the total amount of eligible direct costs of the Action set out in the Grant Agreement with DG JUST.

Ineligible Costs

The Auditor verifies that the expenditure for a selected item does not concern an ineligible cost as described in Article 6.4 of the Grant Agreement. The following costs shall not be regarded as eligible and therefore are not included by the European Commission in the calculation of the final amount of the grant : costs related to return on capital or dividends paid by a beneficiary, debt and debt service charges, provisions for losses or debts, interest owed, doubtful debts, exchange losses, bank costs charged by the beneficiary's bank for transfers from the Commission, excessive or reckless expenditure, deductible VAT, the insurance premium against risk of exchange rate losses, costs of providing financial support to third parties, costs declared under another EU or Euratom grant, any costs and fees for any staff or elected representative of any EU institutions, costs linked to activities that do not take place in one of the eligible countries, contribution in kind from third parties, etc.

The Auditor examines whether revenues which should be attributed to the Action (including inter alia grants and funding received from other donors and other revenue generated by the Beneficiary in the context of the Action such as for example interest earned) have been allocated to the Action and disclosed in the Financial Report. For this purpose the Auditor inquires with the Beneficiary and examines documentation obtained from the Beneficiary. The Auditor is not expected to examine the completeness of the revenues reported.

Annex 2B Guidelines for Specific Procedures to be performed

1. VERIFICATION EVIDENCE

When performing the specific procedures listed in Annex 2A the Auditor may apply techniques such as inquiry and analysis, (re)computation, comparison, other clerical accuracy checks, observation, inspection of records and documents, inspection of assets and obtaining confirmations.

The Auditor obtains verification evidence from these procedures to draw up his report of factual findings. Verification evidence is all information used by the Auditor in arriving at the factual findings and it includes the information contained in the accounting records underlying the Financial Report and other information (financial and non-financial).

The contractual requirements that relate to verification evidence are:

- Expenditure should be identifiable, verifiable and recorded in the accounting records of the Beneficiaries;
- Expenditure must be easily identifiable and verifiable and traced to and within the Beneficiaries' accounting and bookkeeping systems;
- The Beneficiaries will allow any external auditor to carry out verifications on the basis of supporting documents for the accounts, accounting documents and any other document relevant to the financing of the Action. The Beneficiaries give access to all documents and databases concerning the technical and financial management of the Action.

Moreover, for the purpose of the procedures listed in Annex 2A, evidence:

- Must be available in documentary form, whether paper, electronic or other medium (e.g. a written record of a meeting is more reliable than an oral presentation of the matters discussed);
- Must be available in the form of original documents rather than photocopies or facsimiles;
- Should preferably be obtained from independent sources outside the entity (an original suppliers invoice or contract is more reliable than an internally approved receipt note);
- Which is generated internally is more reliable if it has been subject to control and approval;
- Obtained directly by the Auditor (e.g. inspection of assets) is more reliable than evidence obtained indirectly (e.g. inquiry about the asset).

If the Auditor finds that the above criteria for evidence are not sufficiently met, he/she should detail this in the factual findings.

The Auditor verifies, where applicable, and according to the nature of expenditure, the following supporting documents:

- The Grant Agreement and its amendments;
- The mid-term and final Reports;
- For direct personnel costs (payslip, timesheet, work contract, other documents such as social security contribution, invoices, proof of payments);
- For travel and subsistence costs (beneficiary's usual practices on travel, invoices and tickets where applicable, beneficiary statement, other documents such as proof of attendance to a meeting, minutes, proof of payment);
- For equipment costs (invoice, delivery slip, proof of payment);
- For subcontracting costs (terms of reference, procurement where applicable, justification of selection, subcontracting contract, invoices, proof of payment, other documents such as applicable national law regarding procurement, UE directives where applicable);
- For other direct costs for goods and services (invoice, proof of payment, accounting records).

2. OBTAINING AN UNDERSTANDING OF THE TERMS AND CONDITIONS OF THE GRANT AGREEMENT

The Auditor obtains an understanding of the terms and conditions of the Grant Agreement and any other documents in connection with the project with DG JUST, including the Partnership Agreements.

If the Auditor finds that the terms and conditions to be verified are not sufficiently clear he/she should request clarification from ECPAT France.

SELECTING EXPENDITURE FOR VERIFICATION

The expenditure claimed by the Beneficiary in the Financial Report is presented under expenditure headings.

Expenditure subheadings can be broken down into individual expenditure items or classes of expenditure items with the same or similar characteristics. The form and nature of the supporting evidence (e.g. a payment, a contract, an invoice etc) and the way expenditure is recorded (i.e. journal entries) vary with the type and nature of the expenditure and the underlying actions or transactions. However, in all cases expenditure items should reflect the accounting (or financial) value of underlying actions or transactions no matter the type and nature of the action or transaction concerned.

Value should be the principal factor used by the Auditor to select expenditure items or classes of expenditure items for verification. The Auditor selects high value expenditure items to ensure an appropriate coverage of expenditure.

VERIFICATION COVERAGE OF EXPENDITURE

Verification by the Auditor and verification coverage of expenditure items does not necessarily mean a complete and exhaustive verification of all the expenditure items that are included in a specific expenditure heading or subheading. The Auditor should ensure a systematic and representative verification. Depending on certain conditions (see further below) the Auditor may obtain sufficient verification results for an expenditure heading or subheading by looking at a limited number of selected expenditure items.

The Auditor may apply statistical sampling techniques for the verification of one or more expenditure headings or subheadings of the Financial Report. The Auditor examines whether ‘populations’ (i.e. expenditure subheadings or classes of expenditure items within expenditure subheadings) are suitable and sufficiently large (i.e. are made up of large numbers of items) for effective statistical sampling.

If applicable the Auditor should explain in the report of factual findings for which headings or subheadings of the Financial Report sampling has been applied, the method used, the results obtained and whether the sample is representative.

The Expenditure Coverage Ratio (‘ECR’) represents the total amount of expenditure verified by the Auditor expressed as a percentage of the total amount of expenditure reported by the Beneficiary in the Financial Report.

The Auditor ensures that the overall ECR is at least **75%**. If he finds an exception rate of less than 2% of the total amount of expenditure verified (i.e. 1.5 %) the Auditor finalises the verification procedures and continues with reporting

If the exception rate found is higher than 10% the Auditor extends verification procedures until the ECR is at least **90%**. The Auditor then finalises verification procedures and continues with reporting regardless of the total exception rate found. The Auditor ensures that the **ECR for each expenditure heading and subheading** in the Financial Report is at least **10%**

PROCEDURES TO VERIFY SELECTED EXPENDITURE

The Auditor verifies the selected expenditure items by carrying out procedures 3.1 - 3.7 listed in Annex 2A and reports all the factual findings and exceptions resulting from these procedures. Verification exceptions are all verification deviations found when performing the procedures set out in Annex 2A.

The Auditor quantifies the amount of the verification exception found and the potential impact on the DG JUST contribution, should the European Commission declare the expenditure item(s) concerned ineligible (where applicable taking into account the percentage of funding of DG JUST and the impact on indirect expenditure (e.g. administrative costs)). The Auditor reports all exceptions found including the ones of which he cannot quantify the amount of the verification exception found and the potential impact on the DG JUST contribution.

Annex 3 Model of the Certificate on the financial statement

Certificate on the financial statement (CFS)

To

[Beneficiary/affiliated entity's full name
address]

We, [full name of the audit firm/organisation], established in [full address/city/country],
represented for signature of this audit certificate by [name and function of an authorised
representative],

hereby certify

that:

1. We have **conducted an audit** relating to the costs declared in the financial statement of [name of beneficiary/affiliated entity] (the [beneficiary's/affiliated entity's]), to which this audit certificate is attached and which is to be presented to the European Commission under Grant Agreement No [insert number] — [insert acronym], covering costs for the following reporting period(s): [insert reporting period(s)].
2. We confirm that our audit was **carried out in accordance with generally accepted auditing standards** in compliance with ethical rules and on the basis of the provisions of the **Grant Agreement** and its Annexes (and in particular the audit methodology described in Annex 5).
3. The financial statement was examined and all necessary tests of [all/[X]%/] of the supporting documentation and accounting records were carried out in order to obtain **reasonable assurance that**, in our opinion and on the basis of our audit
 - total **costs** of **EUR [insert number]** ([insert amount in words]) are eligible, i.e.:
 - actual;
 - determined in accordance with the [beneficiary's/affiliated entity's] accounting principles;
 - incurred during the period referred to in Article 3 of the Grant Agreement;
 - recorded in the [beneficiary's/affiliated entity's] accounts (at the date of this audit certificate);
 - comply with the specific eligibility rules in Article 6.2 of the Grant Agreement;
 - do not contain costs that are ineligible under Article 6.4 of the Grant Agreement, in particular:
 - costs relating to return on capital;
 - debt and debt service charges;
 - provisions for future losses or debts;
 - interest owed;
 - doubtful debts;
 - currency exchange losses;
 - bank costs charged by the [beneficiary's/affiliated entity's] bank for transfers from the Commission

- excessive or reckless expenditure;
 - deductible VAT;
 - VAT incurred by a public body acting as a public authority;
 - costs incurred during suspension of the implementation of the action;
 - in-kind contributions provided by third parties;
 - costs declared under other EU or Euratom grants (including those awarded by a Member State and financed by the EU or Euratom budget or awarded by bodies other than the Commission for the purpose of implementing the EU or Euratom budget); in particular, indirect costs if the [beneficiary]/[affiliated entity] is already receiving an operating grant financed by the EU or Euratom budget in the same period;
 - costs incurred for permanent staff of a national administration, for activities that are part of its normal activities (i.e. not undertaken only because of the grant);
 - costs incurred for staff or representatives of EU institutions, bodies or agencies;
- [are claimed according to the euro conversion rate referred to in Article 15.6 of the Grant Agreement;]
- total **receipts** of EUR [insert number] ([insert amount in words]) have been declared under Article 5.3.3 of the Grant Agreement and
- the [beneficiary's]/[affiliated entity's] **accounting procedures** are in compliance with the accounting rules of the state in which it is established and permit direct reconciliation of the costs incurred for the implementation of the action covered by the EU grant with the overall statement of accounts relating to its overall activity.

[However, our audit opinion is **qualified** for:

- costs of EUR [insert number]
- receipts of EUR [insert number]

which in our opinion do not comply with the applicable rules.]

4. We are qualified/authorised to deliver this audit certificate [(for additional information, see appendix to this certificate)].
5. The [beneficiary]/[affiliated entity] paid a **price** of EUR [insert number] (including VAT of EUR [insert number]) for this audit certificate. **[OPTION 1:** These costs are eligible (i.e. incurred within 60 days of the end of the action referred to in Article 3 of the Grant Agreement) and included in the financial statement.**][OPTION 2:** These costs were not included in the financial statement.]

Date, signature and stamp