Governance and Internal Controls

Question	Partner response	Documentary evidence
Corporate Governance Structure • *Please, provide details and organigram, including details on Senior Management and Directors (or Trustees)*	EPF Senior Management Team (SMT) includes the Chief Executive Officer (CEO), Associate Director, Chief Financial Officer/Development Director; Civil Society Program Director, Human Rights and Justice Program Director, Human Resources and Office Manager. The SMT has regular meetings which provide space for senior management to share observations and communicate on internal and external matters. SMT makes decisions and / or actions for effective governance of the organization in line with its internal and donor policies. All SMT members have higher education and master's degrees. All have relevant qualifications and certifications. The CEO has a PhD. EPF SMT does not have any family or direct relationship with the founding members.	• EPF's Organigram
Organisation structure • *Does the organisation have an appropriate committee structure underpinning the board (or equivalent) - examples are audit, remuneration and nominations committees?* • *How often do these committees meet?*	Yes. The Board, by resolution adopted by a majority of the trustees in office, may designate and appoint three or more Committees, including, without limitation, an Executive Committee, a Finance and Audit Committee, and a Governance Committee, each of which (with the exception of the Executive Committee) shall consist of at least one trustee, and of additional experts invited by the Board, including non-board members if so designated by the Chairman of the Board. The Committees shall serve as advisory bodies to the Board of Trustees. The Committees shall not function in a way that contradicts the requirements of the charter of the Foundation or applicable legislation. EPF has a Board of Trustees which makes decisions of financial and strategic significance. The full board meets twice a year, once in May and again in November. The Board may have also ad hoc on-line meetings. Various committees of the board may meet more often, including the Executive Committee, the Audit and Finance Committee, the Nominations Committee and the Development Committee. Currently, EPF-Armenia's Board of Trustees includes the following people: Mary Sheehan (Chair) (International Organization for Migration (retired)); Horton Beebe-Center (President Emeritus of Eurasia Foundation); Anna Ohanyan (Stonehill College); Daniel Tarschys (Stockholm University); William Hanlon (UNICEF); Deana Arsenian (Carnegie Corporation);	Please find attached • EPF's Policies and Procedures (P&P), where Board of Trustees functions described starting from page 7 (Clause 2.10 Board of Trustees Authorities) • EPF's Bylaws, which describe in detail functions of the Board and its Committees.

Question	Partner response	Documentary evidence
	Laurens Ayvazian (Former Program Director at Eurasia Foundation); Naira Avetisyan (Chief of Child Protection Programme, UNICEF Ukraine (retired)), Gurgen Narimanyan (Vice-president of Development, Revery Food & Beverages).	
Entity-wide and programme specific Risk management • *Is there a risk management policy?* • *Are there risk registers? How are risks escalated and cascaded? How would risks be escalated to FCDO?*	Yes. EPF has a comprehensive risk management process in place that includes monitoring, regular re-evaluation, and mitigation of both internal and external risks. The Foundation's Risk Matrix is not a statutory document, it is an additional internal control and management document to oversee and mitigate internal and external risks. According to EPF's P&P Section 2 Internal Control Policies, EPF's staff bi-annually assesses risks and their mitigation strategies in relation to the EPF's general operations as well as programmes it implements, suggests mitigation strategies and updates its risk compendium twice a year, which is presented and discussed during every Board Meeting and being approved by the Board. The same strategy will be applied on the assessment on the risk escalation and cascade will be done in relation to FCDO-funded projects, especially taking into consideration that the project involves multi-country stakeholders and the volatile geopolitical changes. EPF also has Emergency Preparedness and Incident Management Plan, and has flexible systems to respond to unexpected risks, ensuring operational resilience.	• EPF's Risk Matrix
Assurance systems and arrangements • *Does the organisation have an annual statement of assurance process? And what does this highlight?*	Yes. EPF's Policies and Procedures include Section 3.3, Financial Management Policies (page 14). As a local foundation, EPF is required to undergo audits of its financial statements and publicly disclose the audit reports on the government website. Since its establishment, EPF has undergone annual audits and has been audited for the past three financial years (2022, 2023, and 2024). In addition to that EPF undergoes programmatic audits if the donor requires separate audit reports. The examples include: Expenditure Verification Reports of EU-funded programmes; Audit of US Government Funds, which was the requirement	• EPF's P&P (Section 3.3 Financial Management Polices, page 14)

Question	Partner response	Documentary evidence
	of the USAID; Sida Audit and Internal Reports, which was the requirement of Swedish Government, etc. The Audit Reports are being approved by the EPF's Board of Trustees, namely by the Audit and Finance Committee. All of the mentioned reports resulted in unqualified (clean) reports with no material mistakes. Currently EPF undergoes the audit of 2025's Financial Statements. The Audit Report will be available by July 1, 2026 and will include funds received from FCDO from the period of November-December, 2025.	
Fraud, other fiduciary risks and conflicts of interest • *Does the organisation have a strategy and formal policies on fraud and fiduciary risk (capturing fraud, bribery and corruption and terrorist financing)?* • *How does the organisation ensure compliance with relevant laws and regulations? e.g. the Bribery Act? In high-risk jurisdictions, how does the organisation comply with terrorist financing legislation and sanctions regulations? Does the organisation have a legal department or access to legal advice?*	Yes. EPF has established comprehensive policies and procedures to prevent and mitigate fraud, bribery, corruption, conflict of interest, fiduciary risks, and terrorist financing risks. EPF applies strict approach to corruption and unethical conduct through its internal Policies and Procedures (P&P), Anti-Corruption Policies, Conflict of Interest Policy, Whistleblower Policy, procurement procedures, and financial management systems. EPF's staff and Board of Trustees annually sign Conflict of Interest declarations. EPF ensures that consultants, vendors, sub-grantees, and beneficiaries also comply with conflict-of-interest and anti-corruption requirements. An employee who has knowledge of a violation of these policies can report them directly or anonymously. The reports can be made in person, via email, mail or phone messages directed to the Procurement/HR/Office Manager and/or to any member of the Finance and Audit Committee of the Board of Trustees. EPF's Board of Trustees receives complaints from EPF's grantees or beneficiaries through an email address (ethicscaucasus@gmail.com) that is publicly available on EPF's website and promoted among all beneficiaries. EPF applies segregation of duties and multi-level authorization procedures for procurement, payments, accounting, and financial reporting to reduce fiduciary and fraud risks. Financial transactions are subject to layered review and approval processes, while procurement activities follow competitive bidding procedures, procurement thresholds, conflict-of-	• EPF's P&P 2.1 Internal Control Policies (page 3) 2.6. Gifts (page 4) 2.7. Bribery (page 5) 2.9. Fraud Policy (page 5) 2.22. Conflict of Interest (page 12) 10. Screening of Terrorism (page 48) 11.8.12. Whistleblower Policy (page 68) • EPF's Anti-corruption Policy

Question	Partner response	Documentary evidence
	interest safeguards, and documented approval chains. EPF uses computerized financial management systems that allow for detailed tracking of donor funds, budget allocations, expenditures, and reporting obligations, helping prevent double financing, misuse of funds, or unauthorized transactions. EPF has a Whistleblower Policy in place and requires all employees and in-house consultants to maintain the highest standards of integrity and accountability. Staff members are trained in anti-corruption and compliance procedures and are required to report suspected violations or misconduct. Reports may be submitted directly or anonymously through several reporting channels, including senior management and the Finance and Audit Committee of the Board of Trustees. EPF also maintains a publicly available ethics reporting email address for complaints from beneficiaries, partners, and grantees. According to EPF's P&P EPF complies with all donor requirements related to counter-terrorism financing regulations, sanctions restrictions, and prohibited-party requirements. As long as EPF receives funding from US government sources, it complies with the requirements of the USA PATRIOT Act and Executive Order 13224. EPF applies due diligence and compliance procedures for partners, vendors, consultants, and sub-grantees to ensure that no funds or support are provided to individuals or entities associated with terrorism or sanctioned activities. EPF remains committed to ensuring that funds from any source are not used to support terrorist activities. EPF does not maintain an in-house legal department but has access to external legal expertise and legal consultation when required to ensure compliance with applicable laws, donor regulations, contractual obligations, and organizational policies.	
Data protection, information security and cyber security	Yes. EPF has established comprehensive information security, data protection, and cyber-security procedures to ensure the confidentiality,	• EPF's Information Security Policy

Question	Partner response	Documentary evidence
• *Does the partner process personal or sensitive information? If so, what processes do they have in place to ensure the data is protected (digital and paper)?* • *Does the organisation have a data breach reporting process in place?* • *Does the organisation have basic cyber security controls in place?*	integrity, and availability of both digital and physical information assets. These measures are outlined in EPF's Information Security Policy. EPF implements strict access control procedures and staff are prohibited from accessing, modifying, or disclosing information without authorization. Highly sensitive data is protected through password protection, encryption, and two-factor authentication (2FA). All corporate email accounts are secured through Microsoft Outlook with multi-factor authentication systems in place. Password complexity requirements and mandatory password rotation policies are also enforced. EPF maintains secure network storage systems with daily backups and multiple server redundancies to minimize the risk of data loss. The organization's servers are housed in a dedicated secured server room equipped with air conditioning, uninterrupted power supply systems, backup electricity lines, and server shutdown alert systems. EPF also uses firewalls, intrusion prevention systems, antivirus protections, and restricted network access controls to safeguard its IT infrastructure. EPF has formal data breach and incident response procedures in place. All staff members are required to immediately report suspected or confirmed incidents involving unauthorized access, disclosure, loss, theft, or compromise of organizational or personal data. The IT Manager coordinates incident response procedures, including risk assessment, mitigation, investigation, recovery actions, documentation, and notification to relevant stakeholders where required. EPF also conducts mandatory information security and cyber-security awareness trainings for staff, including onboarding training and periodic refresher sessions covering phishing risks, secure communication, password management, remote work security, and incident reporting procedures.	

Question	Partner response	Documentary evidence
	EPF's IT Manager serves as the focal point for information security and data protection implementation and has the capacity to perform Data Protection Officer (DPO)-related responsibilities if required.	

Ability to Deliver

Question	Partner response	Documentary evidence
Experience in delivering similar projects and/or in similar areas/contexts. Feasibility assessments. • *Has the organisation implemented similar projects/programmes before?* *(Evidence of past performance could include annual reviews, third party information, and portfolio reviews.)*	EPF has over 25 years of experience implementing peacebuilding, conflict transformation, confidence-building, and regional cooperation programmes in the South Caucasus, including Armenia-Azerbaijan, Armenia-Türkiye, and Armenia-Georgia contexts. Since 1998, EPF has implemented numerous large-scale donor-funded initiatives focused on community dialogue, cross-border cooperation, civic engagement, policy dialogue, and resilience-building in sensitive and conflict-affected environments. EPF has successfully managed and delivered projects funded by the FCDO/UK FCO, European Union, USAID, EUMA, and other international donors, including multi-country and multi-partner programmes with budgets exceeding EUR 1 million. These projects involved complex stakeholder engagement, cross-border dialogue facilitation, capacity building, policy research, and cooperation with local communities, civil society actors, business representatives, and policymakers. Relevant examples include: • "Building Cultures of Peace via Strengthening Informal Peace Architectures, Democracy and Human Rights" (EU, EUR 1.35 million), which strengthened civil society engagement in peace architecture and conflict transformation across the South Caucasus; • "EU4Peace – Civic Engagement, Capacity Building and Crisis Response" (EU, EUR 915,232), which supported Armenian, Azerbaijani and Nagorno-Karabakh civil society actors through peacebuilding, crisis response and resilience initiatives in a highly sensitive post-war context;	• EPF's Project Repository on Cross-border programmes

Question	Partner response	Documentary evidence
	• the long-term "Support to the Armenia-Turkey Normalisation Process" consortium projects (EU-funded phases exceeding EUR 1 million each), which promoted people-to-people contacts, business cooperation, policy dialogue, and regional confidence-building between Armenia and Türkiye; • "Armenia-Turkey Economic Relations: New Stage?" (UK CSSF/FCDO, GBP 100,000), which examined cross-border economic cooperation opportunities and produced policy recommendations on connectivity, trade, tourism, ICT, and business cooperation. • Most recently, EPF implemented the FCDO-funded "Building Resilience and Inclusive Dialogue with Government Engagement in Armenia (BRIDGE Arm)" project, which facilitated structured community discussions and policy engagement on regional connectivity and peace-related issues in Armenia's border regions. Findings and methodologies from this project directly inform the design of the proposed intervention.	
The list of current/recent projects in Armenia • *Please, review the list of projects, including the UK ISF funded and update if necessary*	List of on-going projects: • **Strengthening Refugee-Led Organizations (RLOs) and Building Sustainable Community Leadership** Donor: United Nations High Commissioner for Refugees (UNHCR) Duration: 11/2025 – 12/2026 Budget: USD 95,145 The project strengthens refugee-led organisations and supports sustainable community leadership and integration mechanisms for displaced populations in Armenia. • **Youth Bank: Real Lives, Real Money, Real Change** Donor: The Stirling Foundation Duration: 01/2025 – 09/2026 Budget: USD 50,000 The project supports youth-led community initiatives and civic participation through participatory grant-making and leadership development.	• EPF's Project Portfolio 2025-2026

Question	Partner response	Documentary evidence
	• **Support to Armenia-Türkiye Normalization: Enhancing Cross-border Linkages** Donor: EU FPI Duration: 04/2026 – 09/2027 Budget: EUR 2,500,000 (EPF share: EUR 1,475,731) The project promotes Armenia-Türkiye normalization through strengthening cross-border cooperation, dialogue, and people-to-people and institutional linkages. • **Combating Disinformation by Boosting Critical Thinking: Engaging Regions of Armenia** Donor: CFI – The French Media Development Agency Duration: 04/2026 – 09/2026 Budget: EUR 50,000 The project enhances critical thinking and resilience to disinformation among regional communities in Armenia. • **Building Resilience and Inclusive Dialogue with Government Engagement in Armenia (BRIDGE Arm)** Donor: UK Foreign, Commonwealth & Development Office (FCDO) Duration: 12/2025 – 03/2026 Budget: GBP 100,000 The project facilitated structured community discussions and policy engagement on regional connectivity, peacebuilding, and public perceptions in Armenia's border regions. More information on current/recent projects in EPF's Project Portfolio 2025-2026.	
Expertise, skills, and capacity of staff dedicated to project • *What are the skills and experience of the key programme staff working on the projects funded by FCDO?*	EPF maintains a multidisciplinary team with extensive experience in conflict transformation, peacebuilding, regional cooperation, policy dialogue, project management, financial oversight, monitoring and evaluation, and donor compliance. The key programme staff involved in FCDO-funded projects have substantial experience implementing complex initiatives in sensitive political and security environments across the South Caucasus, including Armenia-Azerbaijan and Armenia-Türkiye contexts.	• EPF's Personnel Policies and Procedures (Section 1.4 Recruitment and Appointment)

Question	Partner response	Documentary evidence
Recruitment of staff • *How are staff recruited? Is the recruitment process open, fair, transparent and non-discriminatory?*	**Dr Gevorg Ter-Gabrielyan (EPF CEO) – Senior Expert** Dr Ter-Gabrielyan will provide senior-level strategic oversight and methodological guidance throughout the project. His responsibilities include development of methodologies, review of strategic documents, facilitation of selected in-country and cross-border meetings, editing analytical digests, and communication with high-level government stakeholders and international partners. **Mr Vazgen Karapetyan (EPF Associate Director) – Programme Director / Quality Assurance Manager** Mr Karapetyan will oversee the overall quality, coherence, and timely delivery of all project components. He will supervise and coordinate external experts and consultants, review analytical briefs and reports, support risk management and lesson-learning processes, and ensure that all activities and outputs comply with EPF's professional, ethical, and donor standards. **Ms Kristina Sahakyan / Ms Nelly Khachatryan – Finance Managers** The Finance Managers will oversee financial management and compliance of the project, ensuring that all expenditures, transfers, and payments are implemented in accordance with EPF internal procedures and donor regulations. They will prepare financial reports, maintain audit-ready documentation, monitor budget implementation, and provide regular financial updates related to project activities, regional travel, expert engagement, and event organization. **Ms Isabella Sargsyan (EPF Programme Director) – Human Rights and Government Liaison Expert** Ms Sargsyan will lead implementation of activities under Objective 1, including coordination with national and local government stakeholders, facilitation of 12 community discussions and 4 strategic discussions, and preparation of analytical digests. She will also deliver capacity-building activities on human rights, conflict transformation, communications, and related thematic areas. She has more than 25 years of experience in peacebuilding, civic engagement, and stakeholder facilitation. **Ms Gayane Mkrtchyan (EPF Programme Director) – Communities Liaison and Capacity Building Expert**	

Question	Partner response	Documentary evidence
	Ms Mkrtchyan will coordinate engagement with community dialogue platform members across the six target regions and lead capacity-building activities for participating CSOs and community actors. She will facilitate trainings on organisational development, project management, and community engagement. **Ms Marina Ayvazyan (EPF Chief Financial Officer / Development Director) – Monitoring, Evaluation and Learning (MEL) Expert** Ms Ayvazyan will oversee monitoring, evaluation, and learning processes across all project components. She will develop and apply monitoring tools and indicators, support data collection and reporting, document lessons learned, and ensure compliance with EPF and donor MEL standards. With almost 30 years of experience in financial management, development programming, and evaluation, she brings extensive expertise in donor-funded project oversight. Yes. EPF has established formal Human Resources Policies and Procedures that govern the recruitment and appointment of staff. Recruitment processes are merit-based, transparent, and non-discriminatory, and are conducted in line with the Labor Code of the Republic of Armenia and EPF's internal policies. All positions are filled based on professional merit, relevant qualifications, appropriate skills, and demonstrated experience required for the position. Recruitment decisions are made by the CEO in consultation with the HR Manager and relevant supervisors. EPF follows a structured recruitment process which includes: • development of clear job descriptions and terms of reference, • internal vacancy announcements, • external advertisement and open searches where appropriate, • competitive selection procedures, • interviews and assessments, • reference and background checks,	

Question	Partner response	Documentary evidence
	• probation and induction periods for new staff. EPF is an equal opportunity employer and does not discriminate on the basis of sex, race, ethnicity, religion, political opinion, disability, age, social origin, sexual orientation, gender identity, or other personal characteristics. Recruitment, promotion, and employment decisions are based solely on qualifications, competencies, and performance. EPF also maintains policies on anti-harassment, conflict of interest, whistleblowing, and prevention of sexual exploitation, abuse, and harassment (PSEAH), which contribute to a safe, inclusive, and accountable working environment. Staff involved in recruitment processes are expected to adhere to these principles and avoid any conflicts of interest.	

Staff performance management systems and staff learning and development
 	
• *What processes are in place to ensure that the organisation has the appropriate capacity and capability of staff? How is completion ensured?*
  ○ *L&D offers?*
  ○ *Induction process?*
  ○ *Mandatory (including refresher) training? How often is refresher training?*
  ○ *Performance management?*
	Yes. EPF has established comprehensive personnel policies and procedures to ensure that the organization maintains appropriate staff capacity, professional capability, and high performance standards. Staff development, performance management, and organizational learning are integrated into EPF's operational systems and organizational culture. EPF recognizes that the skills and knowledge of its staff are critical to the success of the organization. Through its Training and Educational Assistance Program, EPF supports continuous professional development and encourages staff to maintain and improve job-related skills.
	
	The organization provides: job-specific and job-related trainings; internal capacity-building sessions; external trainings relevant to staff responsibilities; merit-based international training opportunities; on-the-job learning and mentoring; professional memberships and participation in professional events.
	
	According to EPF's Policies and Procedures, eligible staff members may receive financial support for professional training and educational development. EPF also regularly organizes trainings related to: anti-corruption and ethics; PSEAH (Prevention of Sexual Exploitation, Abuse
		• EPF's Personnel Policies and Procedures (Section 1.9 Staff Development)

Question	Partner response	Documentary evidence
	and Harassment); gender sensitivity and inclusion, disaster preparedness and first aid; information security and data protection; project management and monitoring; conflict sensitivity and risk management. EPF additionally encourages participation in external trainings when relevant to staff responsibilities and organizational priorities. EPF has a structured onboarding and induction process for newly recruited staff members and in-house consultants. Upon appointment, employees receive: EPF's Policies and Procedures Manual; job descriptions and contracts; organizational policies on ethics, anti-harassment, confidentiality, conflict of interest, and whistleblowing, guidance on reporting lines, responsibilities, and operational procedures. New staff members undergo induction and probation periods in accordance with EPF's recruitment and HR procedures. The induction process is designed to ensure that staff understand organizational expectations, donor compliance requirements, and internal operational systems. EPF requires staff members to familiarize themselves with and adhere to organizational policies and procedures, including anti-corruption, whistleblowing, PSEAH, gender equality, information security, and ethical conduct policies. Mandatory trainings are conducted for staff and, where relevant, for contractors, grantees, and partner organizations. EPF also organizes periodic refresher and sensitization sessions, particularly in areas related to: PSEAH; anti-corruption and compliance; security and emergency preparedness; IT and data protection,gender equality and safeguarding. EPF has established formal performance management systems to monitor staff performance, support professional growth, and ensure accountability.	

Question	Partner response	Documentary evidence
	EPF conducts: annual performance evaluations; regular supervisor feedback sessions; appraisal-based salary and promotion reviews. Performance evaluations are linked to organizational planning, budgeting, salary adjustments, promotions, training opportunities, and staff development plans. The HR/Office Manager oversees the performance review process and ensures timely completion and integration of results into organisational planning and management processes.	
Stakeholder engagement processes • *Does the organisation have the ability to access the intended beneficiaries/stakeholders, or negotiate that access where necessary?*	EPF has more than 30 years of experience working with a broad range of stakeholders, including local CSOs, community-based organizations, local and central government institutions, media organizations, educational institutions, businesses, and international partners. Beyond Armenia, EPF has also established long-term cooperation and trust-based relationships with stakeholders in neighbouring countries, including Georgia, Türkiye, and Azerbaijan. Due to its strong institutional reputation and extensive regional networks, EPF has a demonstrated ability to access intended beneficiaries and stakeholders, including in sensitive and conflict-affected contexts, and to mobilize relevant actors throughout the project implementation process. EPF's long-standing partnerships and credibility among civil society, public institutions, donor organizations, and local communities significantly facilitate outreach, stakeholder engagement, coordination, and beneficiary participation. This institutional trust and recognition enable EPF to effectively negotiate access where needed and ensure meaningful participation of diverse target groups in project activities. An important mechanism supporting EPF's stakeholder engagement capacity is the InfoTun Network, which is a network of 10 regional information and civic engagement hubs operating across all regions of Armenia and hosted by strong local CSOs. Established in 2011 under the USAID-supported "Alternative Resources in Media" project, the InfoTun	• EPF's InfoTuns Three-pager

Question	Partner response	Documentary evidence
	Network has evolved into a widely recognized platform promoting civic participation, media literacy, local governance, community development, and public oversight. The Network's strong local presence and established methodologies allow successful initiatives implemented in one community to be replicated and adapted in other regions. To date, the InfoTun Network has organized more than 2,000 events and implemented over 150 projects, engaging more than 20,000 beneficiaries throughout Armenia. The network is widely recognized by civil society, local and central authorities, and international organizations as an effective platform for community engagement, civic education, participatory democracy, and local development initiatives.	

Financial Stability

Question	Partner response	Documentary evidence
Financial stability • *Are there any current identified risks to the financial sustainability of the organisation or the interventions being funded?* • *Does the organisation have adequate reserves to withstand shocks?*	EPF continuously monitors risks related to financial sustainability through its budgeting, financial oversight, audit, and risk management systems. The organization maintains diversified funding sources, with major institutional donors including UK FCDO, the European Union, and Sida, reducing overreliance on a single funding stream. EPF's annual budgeting and business planning processes are aligned with its strategic objectives and are reviewed and approved by the Board of Trustees. Financial monitoring is conducted regularly through budget-versus-actual analyses, internal controls, and external audits. EPF has established comprehensive financial management and risk mitigation systems designed to ensure operational continuity and resilience in changing environments. These include multi-level financial oversight, computerised financial management systems, regular financial reconciliations, risk management procedures, and internal and external audits. EPF also maintains insurance coverage for property, liability, and political risks and has developed emergency preparedness and incident	• EPF's Audit Reports of 2022, 2023 and 2024

Question	Partner response	Documentary evidence
	management systems to support organizational resilience during operational or external shocks. EPF has demonstrated long-term operational sustainability through more than 30 years of experience managing international donor funding and maintaining continuity of operations during periods of political instability, conflict escalation, economic uncertainty, and staff transitions. The organization has developed second-tier leadership capacity and institutional continuity mechanisms to ensure uninterrupted operations and implementation capacity. At present, EPF is not aware of any critical risks that would threaten the financial sustainability of the organisation or the implementation of ongoing interventions. Potential operational and contextual risks are monitored continuously through EPF's Risk Compendium, risk matrix, budgeting systems, and Board oversight mechanisms, with mitigation measures updated regularly. While EPF does not rely on cash-based operations, it maintains secure banking arrangements, designated project accounts, and financial control systems that support liquidity management and organizational resilience. Financial sustainability and reserve management are regularly monitored by senior management and the Finance and Audit Committee of the Board of Trustees.	
Financial sustainability • *How are currency risks managed within the organisation?* • *Are staff responsible for financial management sufficiently qualified and experienced?*	EPF has extensive experience managing donor funds in multiple foreign currencies, including USD, EUR, GBP, and AMD, and has established financial procedures to mitigate currency and foreign exchange risks. The organization maintains multiple bank accounts in different currencies at Inecobank CJSC, allowing donor funds to be managed and expended in the original currency whenever possible. For financial management purposes, EPF uses two types of software: (1) HOPE system: This is customized software for project and financial management that allows for the input of donor project budgets and	

Question	Partner response	Documentary evidence
	expenses, and generates various reports, including BvAs (Budget vs. Actual). EPF's CFO conducts weekly comparisons of BvAs to monitor spending for each project and makes adjustments to the budgets if necessary, in coordination with project management staff. In cases of significant deviations from the budget, proposed changes in activities are communicated with donors in advance to obtain authorization for the corresponding budget adjustments. (2) Armenian software (հայկական ծրագրեր (ՀԾ): This software is used to record financial transactions in accordance with the financial accounting standards of the Republic of Armenia. The reports generated by this system form the basis for auditors to verify EPF's annual financial statements. The organization also applies donor-specific financial procedures regarding currency conversions, budget reallocations, and expenditure approvals. EPF has established internal controls for international transfers and foreign currency transactions, including multi-level authorization and approval mechanisms through secure online banking systems. EPF's long-standing experience implementing international donor-funded projects and managing multi-currency operations has enabled the organization to maintain stable and compliant financial operations in fluctuating economic environments. Yes. EPF has a qualified and experienced Finance Department with appropriate staffing and segregation of duties to manage the organization's financial operations and donor compliance requirements. The Finance Department currently consists of: Chief Financial Officer (CFO); Finance/Grants Manager; Finance Manager. According to EPF documentation, the CFO and Finance Managers each have more than 15 years of experience managing international donor grants and overseeing financial operations of projects and organizational budgets of up to approximately USD 3 million annually.	

Question	Partner response	Documentary evidence
	All finance staff possess relevant higher education qualifications and professional experience in financial management within both local and international NGO environments. EPF staff are experienced in managing donor-funded projects financed by organizations such as the UK FCDO, EU, Sida, UN and USAID agencies, including compliance with donor-specific financial reporting, audit, procurement, and budgeting requirements. The organization also maintains strong internal control and oversight mechanisms, including: multi-level financial approval procedures; segregation of duties; regular external audits; internal audit functions; Board Finance and Audit Committee oversight; automated financial reporting systems; and ongoing financial monitoring and reconciliation processes.	
Payment processes • *Are there appropriate payment controls? For example, dual authorisation over certain thresholds?*	Yes. EPF has established robust payment control and authorization procedures to ensure financial accountability, transparency, and compliance with donor and internal financial management requirements. The organization applies multi-level approval and segregation-of-duties mechanisms for all financial transactions. Payments are processed through formal Payment Requests (PRs), which must specify: the relevant project and budget line; the purpose of the expenditure; supporting procurement and financial documentation; and the justification for the payment. EPF operates a dual/multi-signatory authorization system through its online banking platform. Financial transactions require review and approval by multiple authorized staff members before execution. According to EPF procedures: one authorized signatory prepares the transaction; a second authorized signatory reviews and approves it after verifying compliance with project budgets and documentation; and a senior authorized signatory provides final approval for the transfer.	

Question	Partner response	Documentary evidence
	The organization maintains clear segregation of duties between staff responsible for: initiating transactions; approving expenditures; recording financial information; and reconciling accounts. EPF also conducts regular bank reconciliations, budget-versus-actual (BvA) monitoring, internal control reviews, and annual external audits. Financial controls are further overseen by the Finance Department, senior management, internal auditor, and the Board's Finance and Audit Committee. All payments are conducted through bank transactions, and EPF does not use cash operations in its regular activities, which further strengthens financial transparency and accountability.	
Value for money and usage of FCDO Fundings – Key cost drivers, sensitive costs, and output costs • *How does the organisation measure and achieve value for money? Does it have a value for money strategy and what evidence is there that the organisation is pursuing VFM**?***	EPF promotes value for money through established procurement, financial management, and internal control systems designed to ensure the economical, efficient, transparent, and accountable use of donor funds, as outlined in EPF's Accounting Policy and Operations Manual (Procurement Policies section). According to EPF's Operations Manual, all purchases must be made in the best interests of EPF and its donors while seeking "maximum value for all expenditures" through competitive procurement processes, supplier comparison, and documented price analysis. The organization is committed to promoting full and open competition and applies procurement thresholds with different approval and review requirements depending on the value of procurement. EPF's procurement procedures include written bidding requirements, tender processes for higher-value procurements, segregation of duties, proposal evaluation panels, procurement history files, vendor performance tracking, and documented justification for sole-source procurement. The Operations Manual further requires price analysis and, where necessary, cost analysis to assess the reasonableness, allocability, and allowability of expenditures.	• EPF's Operational Manual • EPF's Accounting Policy

Question	Partner response	Documentary evidence
	Financial oversight and accountability mechanisms are further supported by EPF's Accounting Policy, which establishes rules for financial reporting, internal control, asset management, expenditure recognition, inventory procedures, foreign currency accounting, and financial oversight responsibilities of management and accounting personnel. The policy also outlines requirements for documentation, authorization, inventory verification, and financial monitoring. Procurement and financial oversight involve multiple levels of review and authorization, including the Procurement/HR/Office Manager, Accounting Department, CFO, President/CEO, and, for high-value procurements, the Board of Trustees. These systems help ensure transparency, accountability, donor compliance, and effective use of resources throughout project implementation.	

Downstream Delivery

Question	Partner response	Documentary evidence
Downstream due diligence • *Does the organisation have robust and transparent systems for selecting and assessing implementing partners? How are these systems documented?* • *Does the organisation expect a standard due diligence exercise which must be followed?*	EPF has robust and transparent systems for selecting, assessing, managing, and monitoring implementing partners and sub-grantees. These systems are formally documented through EPF's Policies and Procedures Manual, Accounting and Financial Management Procedures, Sub-granting Procedures, Procurement and Compliance Policies, Anti-Fraud and Anti-Corruption Policies, Conflict of Interest Policy, MEL framework, Risk Management Matrix, and standardized Grant Agreement templates. EPF applies structured pre-award and post-award due diligence procedures that include both programmatic and financial/legal assessments. These procedures include organisational capacity assessments, governance and compliance checks, financial and operational reviews, conflict of interest screening, verification of legal registration and financial documentation, assessment of accounting and internal control systems, and review of previous grant management experience. Depending on donor requirements	• Excerpt from EPF Policies and Procedures Manual: Guidelines for Assessing and Following up on Third Parties *Is there graphic to Delivery Chain you can provide? If not clear at this moment, could you please develop it within the first two quarters of delivery once the downstream partners are identified and subcontracted.*

Question	Partner response	Documentary evidence
	and assessed risk levels, additional measures may include site visits, audits, procurement reviews, and monitoring of sub-grantee performance. The organization maintains documented procedures for proposal and partner review; grants management due diligence; risk assessment and mitigation; procurement and subcontracting; grant monitoring and reporting; financial oversight and compliance; audits and site visits; sub-grantee oversight; and grant closeout procedures. In addition, EPF organizes Grants Management Seminars for sub-grantees and implementing partners prior to and during project implementation. These seminars include modules on project and financial management, procurement and compliance procedures, communication and visibility requirements, donor regulations, financial and programmatic reporting, MEL requirements, risk mitigation, and grant administration processes. Yes, EPF follows standardized due diligence procedures that must be applied for grants and sub-grants implemented through external partners. These procedures are integrated into EPF's operational and financial management systems and are adapted in accordance with donor requirements, project size, funding level, and identified risk factors.	
Downstream risk management and reporting • *What processes does the organisation have in place to monitor and manage the activities of implementing partners? For example, are there site visits or audits? Are there regular meetings and reports provided?*	EPF has established comprehensive processes to monitor and manage the activities of implementing partners and sub-grantees throughout the project cycle. These processes are formally embedded within EPF's Policies and Procedures Manual, MEL framework, grant management procedures. EPF applies a combination of programmatic, financial, and compliance monitoring mechanisms, including regular narrative and financial reporting by implementing partners and sub-grantees; periodic review of supporting financial documentation and expenditure reports; regular coordination meetings and follow-up consultations with partners; site visits conducted by programmatic and grants management staff; risk-based monitoring and oversight measures; procurement and compliance checks; monitoring of outputs, outcomes, and performance indicators; beneficiary and stakeholder feedback collection; and, where required, independent audits and external evaluations.	• EPF: Monitoring, Evaluation and Learning • Excerpt from EPF Policies and Procedures Manual: Guidelines for Assessing and Following up on Third Parties • EPF's P&P (Section 6.7 Subgrant Awards, page 28)

Question	Partner response	Documentary evidence
	EPF conducts both pre-award and post-award monitoring of implementing partners. Depending on the size of the grant, donor requirements, and assessed risk level, partners may be subject to enhanced monitoring measures, including mandatory site visits, additional reporting requirements, procurement verification, and audit procedures. EPF also provides ongoing technical support and MEL guidance to implementing partners and sub-grantees, including orientation on reporting, compliance, financial management, and donor requirements. The organization utilizes its proprietary grants management system (HOPE) to systematically document, track, and oversee partner activities, grant performance, reporting schedules, payments, and compliance actions. Regular communication with implementing partners is maintained through formal meetings, progress reviews, ad hoc consultations, and consolidated quarterly and annual reporting mechanisms. Where appropriate, donors are also informed through regular narrative and financial reports, monitoring updates, and participation in project activities and site visits.	

Safeguarding

Question	Partner response	Documentary evidence
Risk Management • *Does the organisation have a risk management matrix/register and clear processes to identify, assess and mitigate SEAH risks?* • *Are SEAH risks regularly reviewed and are there processes to escalate risks (e.g.,*	EPF applies safeguarding and SEAH risk mitigation measures through its Policies on Prevention of Sexual Exploitation and Abuse, Anti-Harassment Policy, Gender Policy, Code of Conduct, Whistleblowing mechanisms, and related operational procedures. While EPF does not maintain a standalone SEAH-specific risk register, safeguarding and protection risks are considered within the organization's broader project management, compliance, partnership oversight, and monitoring processes. EPF identifies and addresses safeguarding-related risks through staff and partner trainings, contractual safeguarding obligations, gender-sensitive programming and monitoring approaches, partner oversight procedures, designated PSEAH focal points, confidential reporting	• EPF Policies on Prevention of Sexual Exploitation and Abuse • EPF's Gender Policy • EPF's Anti-Harassment Policy One of the Due Diligence report recommendation was - The key staff that will be working on the

Question	Partner response	Documentary evidence
from project level) to appropriate senior and independent people?	channels, and regular communication with staff, grantees, beneficiaries, and implementing partners. EPF has procedures for reviewing, reporting, and escalating safeguarding and SEAH-related concerns through management, Human Resources, supervisors, safeguarding focal points, whistleblowing mechanisms, and, where appropriate, direct reporting channels to the EPF Board. In accordance with EPF's Whistleblowing Policies, beneficiaries and partners may confidentially report incidents to a designated Board member. Reported concerns may be escalated internally for inquiry or investigation and, where appropriate, referred to relevant external authorities in accordance with Armenian legislation. EPF's procedures emphasize confidentiality, protection of complainants and whistleblowers, protection against retaliation, and management oversight of reported incidents. Supervisors, managers, and responsible personnel are expected to monitor compliance with safeguarding policies and report on implementation and incidents on a regular basis.	project provides the most recent records on completion of SEAH trainings. Could you please provide update on the completion/progress on this? On December 26, EPF's Human Rights and Justice Program Director conducted an internal training session for staff members on Human Rights and Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH). The training focused on safeguarding principles, zero-tolerance policies, reporting and escalation mechanisms, staff responsibilities, and organizational procedures related to prevention and response to SEAH-related incidents.
• *Does the organisation have clear investigation and disciplinary procedures including with clear sanctions for misconduct to use when allegations and complaints of SEAH are made?*	Yes. EPF has clear procedures for reporting, investigating, and addressing allegations and complaints related to Sexual Exploitation, Abuse and Harassment (SEAH), as outlined in its Policies on Prevention of Sexual Exploitation and Abuse, Anti-Harassment Policy, and related internal procedures. Staff members, beneficiaries, grantees, and partners may report incidents through designated management channels, Human Resources, supervisors, safeguarding focal points, and whistleblowing mechanisms. Upon receiving a complaint, the Human Resources Manager or relevant supervisor initiates an inquiry or investigative process, while ensuring confidentiality and protection of victims, complainants, and whistleblowers. Where appropriate, cases may also be referred to competent external authorities in accordance with Armenian legislation.	• EPF Policies on Prevention of Sexual Exploitation and Abuse

Question	Partner response	Documentary evidence
	EPF's policies provide for disciplinary and corrective measures proportionate to the severity of the misconduct. Sanctions may include verbal or written warnings, suspension, dismissal or termination of employment or contractual relations, exclusion from partnership arrangements, and referral for criminal prosecution where required by law. During internal investigations, EPF may also suspend financial and/or contractual relations with the accused individual or entity, where appropriate.	
Code of Conduct • *Does the organisation have a code of conduct that adheres to the IASC 6 principles on preventing sexual exploitation and abuse, or as a minimum, states that staff must not sexually abuse, exploit or harass other people, and prohibits sexual relationships with those under the age of 18 years?*	Yes. EPF has a Code of Conduct and related safeguarding policies, including its Policies on Prevention of Sexual Exploitation and Abuse, Anti-Harassment Policy, and Gender Policy, which establish a zero-tolerance approach toward sexual exploitation, abuse, harassment, discrimination, and other forms of gender-based violence. These policies apply to EPF staff, consultants, grantees, implementing partners, contractors, and beneficiaries. EPF's policies explicitly prohibit sexual harassment, sexual abuse, sexual exploitation, and other forms of misconduct, and require all affiliated individuals and entities to adhere to safeguarding and protection standards. EPF's safeguarding framework is grounded in principles of human dignity, protection, non-discrimination, accountability, confidentiality, and protection from retaliation. EPF also recognizes and applies relevant national legal provisions related to crimes against sexual freedom and inviolability, including legal protections applicable to children and vulnerable persons. EPF staff members are required to comply with and formally acknowledge key institutional policies and standards, including the Anti-Harassment Policy, Code of Conduct, Conflict of Interest Policy, Anti-Corruption and Anti-Fraud policies, and safeguarding-related procedures. These obligations are also reflected in contractual arrangements with consultants, implementing partners, sub-grantees, and service providers. EPF further supports compliance through regular awareness-raising, internal discussions, and staff training on safeguarding, gender sensitivity, and protection standards.	• EPF Policies on Prevention of Sexual Exploitation and Abuse
Recruitment and Training	Yes. EPF provides mandatory safeguarding- and SEAH-related orientation and awareness-raising for newly recruited staff members and relevant project personnel as part of its onboarding and institutional compliance practices. This	• EPF's Gender Mainstreaming Presentation

Question	Partner response	Documentary evidence
• *Does the organisation provide mandatory training on SEAH to new trustees/staff/volunteers within a suitable and appropriate timeframe of them joining the organisation?*	includes familiarization with EPF's Policies on Prevention of Sexual Exploitation and Abuse, Anti-Harassment Policy, Gender Policy, Code of Conduct, Whistleblowing Procedures, and related safeguarding and protection standards. EPF also conducts periodic internal trainings and awareness sessions for staff and project teams on human rights, safeguarding, gender sensitivity, protection standards, reporting mechanisms, prevention of sexual exploitation, abuse and harassment, internal complaint procedures, and disciplinary measures. For example, EPF's Human Rights and Justice Program Director conducted an internal Human Rights, Gender Mainstreaming, and PSEAH training session for EPF staff on 26 December 2025, covering topics related to gender equality, sexual harassment, reporting and investigation procedures, safeguarding obligations, and disciplinary sanctions.	