

SNGN ROMGAZ SA Integrity Plan

Annex to Decision No.28/17.01.2019

| Measures | Performance Indicators | Risks | Sources of verification | Implementation deadline | Responsible for implementing | Budget |
|---|--|---|---|-------------------------|--|--------|
| <i>Objective 1: Enhanced implementation of anti-corruption measures within the organization</i> | | | | | | |
| 1.1 Integrity plan to be circulated within the organization and published on the organization's website | Integrity plan approved and disseminated (e-mail, information note, meeting, etc.) Number of employees informed as regards approval of the Integrity Plan. Ways to inform employees (i.e. meeting, e-mail, information note, etc) Integrity Plan published on the organization's website. | Deficient communication | Integrity plan approved | March 2019 | Organization's Management Integrity Plan Coordinator/ Project team appointed to implement SNA | NA |
| 1.2 Analysis and identification of vulnerabilities to corruption as well as identification of employees engaged in such activities Gradual implementation within the organizational units of the corruption vulnerabilities analysis and identification methodology as premises for the development of internal integrity plans. | | | Status communication letters | June 2019 | Internal Managerial Control Office | NA |
| | Number of inventoried risks and vulnerabilities | Consultation formal in nature. Insufficiently trained personnel to apply the methodology Employees' resistance against new approaches | Summary document of corruptions risks and vulnerabilities | Permanently | All management positions Integrity Plan Coordinator/ Project team appointed to implement SNA | |
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| 1.3 Implementation of remedy measures of identified specific vulnerabilities | Number of implemented measures/ Number of remedy measures | Process formal in nature Insufficiently trained personnel to apply the methodology | Report on vulnerability remedy measures | Permanently | Heads of organizational units responsible with remedy measures implementation Corruption risk management working group for monitoring | Based on identified remedy measures |
| 1.4 Annual assessment of Integrity Plan implementation and adjustment with the newly identified risks and vulnerabilities; to be submitted to the higher hierarchical entity, SGG and the Ministry of Justice | Degree of implementing the Integrity Plan Newly introduced/ reviewed measures | Assessment formal in nature. Employees not participating / not involved | Assessment report Database at BCM (in accordance with the self-assessment questionnaire) | Annually | Organization's Management Integrity Plan Coordinator/ Project team appointed to implement SNA | NA |
| 1.5 Periodical (annual) self-assessment of the implementation status of institutional transparency and corruption prevention measures (Annex 3 to SNA – measures inventory) | Data and information collected for all indicators included in the inventory | Lack of a unified data collecting mechanism | SCIM self-assessment questionnaire Self-assessment report | Annually Half-yearly assessments | Organization's Management , Integrity Plan Coordinator/ internal management control (questionnaire adjusted with the annual self-assessment) | NA |
| 1.6 Improving the integrity dedicated section in the company's webpage, where the following are to be published: declaration on accession, Integrity Plan, self-assessment reports, information, examples of best practices in the field, etc. | Separate section created on the webpage Number of published materials | Delays in updating information. Delays in creating the separate section/ upload of data due to additional burdens of the involved personnel | Company's webpage | Permanently | Organization's Management , Integrity Plan Coordinator | NA |
| 1.7 Enhanced activities to implement the internal/managerial control system | Number of inventoried sensitive positions Status of compliance of the internal/managerial control system | Process formal in nature. Insufficiently trained personnel in this field Employees' resistance against new approaches/ requirements | Development Schedule of the internal/managerial control system; Sensitive positions; Risk register; Report on the internal/managerial control system as of December 31 | Permanently | Organization's Management, Internal Managerial Control Office | NA |

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| 1.8 Updating / harmonization of the Code of Conduct, Internal Rules and specific fraud/corruption Rules newly prepared at organizational level. | Code of Conduct updated, disseminated and implemented | Process formal in nature. Poor participation / involvement of employees in the process of document updating/ harmonization | Prepared reports List of confirmation of knowledge of the provisions of the Code of Conduct Company webpage Questionnaires to assess the level of knowledge of the provisions of the Code of Conduct applicable to the personnel | Permanently | Organization's Management Integrity Plan Coordinator/ Project team appointed to implement SNA | NA |
| 1.9 Preparation and implementation at organizational level of Rules to define anticorruption indicators (methodology on decisional transparency, access to information, open data, gift declaration, avoidance of situations of conflict of interest and incompatibility cases, and management of such events when identified, warning in the public interest, etc) ¹ | Number of defined indicators by internal Rules Number of implemented internal Rules on defining specific anticorruption indicators | Process formal in nature. Delays in preparing internal Rules due to additional burdens of involved personnel | Internal Rules in place Minutes of meetings Training report Dissemination list Reports | Permanently | Organization's Management , Integrity Plan Coordinator/ Project team appointed to implement SNA | NA |
| 1.10 Active implication of the Ethics Advisor in advisory activities for the organization's personnel | Number of advisory meetings of the organization's personnel on ethics rules Number of employees informed by means of information actions on conduit standards Number of employees requesting advice on ethics Number of cases which have been the subject of advice on ethics Number of reports on conduit rules compliance | Personnel reluctance/ lack of information to address the Ethics Advisor Insufficient financial resources to perform the activity and ensure access to professional training | Report on conduit rules compliance | Permanently | Organization's Management Ethics Advisor | NA |

¹ Annex 3 to the 2016 – 2020 National Anticorruption Strategy

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| | Number of trainings attended by the Ethics Advisor with the aim of improving the activity in the field | | | | | |
| 1.11 Optimizing the warning system of irregularities and potential acts of corruption (i.e. post box, allocated toll-free telephone numbers (green numbers), dedicated e-mail address) | Number of submitted warnings of acts of corruption: Type of acts which have been subject of corruption warnings | Misunderstanding of the concept “warning in the public interest” Failure to designate the person/structure to receive, analyze the warnings in the public interest Lack of periodical analyses of received warnings and setting up best practice actions based on analysis results Failure to implement the whistleblower protection mechanism Personnel’s lack of confidence as regards protection of individuals exposing irregularities | Company’s website Post box Allocated toll-free telephone numbers (green numbers) Dedicated e-mail address | Permanently | Organization’s management Ethics Advisor | NA |
| Objective 2: Enhancement of employees’ anti-corruption education | | | | | | |
| 2.1 Organizing/ implementing/ ensuring participation in professional training programs on anti-corruption, both external courses and in-house activities of the personnel engaged in corruption-prone activities, especially in procurement activities: (contracting, contract monitoring, etc.) | Number of implemented programs/ training activities Number of participants Number of implemented course modules Number of participation certificates Number of trained employees by dissemination of knowledge gained in course performed by the hierarchical superior level and/or competent structures | Insufficient financial resources Poor participation Resilience | Activity reports Attendance lists Participation/ graduation certificates Minutes of work sessions | December 2019 | Organization’s management Integrity Plan Coordinator Ethics Advisor | To be estimated depending on the number of participants, content of program, etc. |
| 2.2 Conducting awareness campaigns, organizing periodical debates on corruption prevention | Number of conducted awareness campaigns Number of organized debates | Failure to allocate necessary resources (budgetary and human) | Company’s webpage Activity reports Information material | Permanently | Organization’s management Integrity Plan Coordinator | To be estimated depending on |

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| and promoting best anti-corruption practices | Number of disseminated best practices | Poor level of interest and employees' participation | Minutes of working sessions | | | the campaign type, size, target group etc. |
| Objective 3: Development of a transparency culture for an open governance at local level | | | | | | |
| 3.1 Publication of open format public interest information | Number of data sets published in open format. ² | Lack of interest for open format information publishing | Company's webpage | Permanently | Organization's management Appointed personnel | NA |
| 3.2 Publication of public interest information in accordance with the general standard in Annex 4 and Annex5 ³ to SNA | Number of published information | Lack of financial and human resources | Company's webpage | Permanently | Organization's management Appointed personnel | NA |
| Objective 4: Consolidation of administrative control mechanisms | | | | | | |
| 4.1 Further consolidation of internal control and audit structures, and raising awareness of employees as regards the role of internal/managerial control systems | Number of employees vs amount of activity Allocated material resources; Number of internal control measures and formulated/implemented recommendations | Insufficient human and financial resources | Audit Committee Notes Monitoring Committee Minutes | Permanently | Organization's management Head of Internal Audit Office Head of CIM | To be estimated depending on the human resources required |
| 4.2 Every two years, internal audit of the corruption prevention measures system at organizational level | Number of formulated recommendations Implementation status of anti-corruption preventive measures | Insufficient human resources | Audit reports Activity reports | Every two years (since 2018) ⁴ | Organization's management Internal audit structure within the organization | NA |
| 4.3 Imposing disciplinary sanctions as deterrent for infringement of ethic and anti-corruption conduit standards for all employees | Number of received referrals Number of referrals settled/pending for settlement Number and type of imposed sanctions Number of decisions of the disciplinary commission annulled or modified by the court. Number of individuals that have repeatedly committed infringements | Activity of the disciplinary commission formal in nature Insufficient training/information to personnel The practice of adopting the easiest sanctions/ no sanctions | Decisions of the Prior Investigation Commission | Permanently | Organization's management Prior Investigation Commission | NA |

² Open data are data in an editable format (i.e. .doc, .xls etc), that may be used, reused and redistributed freely by anyone. More information on open data on <http://ogp.gov.ro/>

³ As the case may be, depending on the type of the institution.

⁴ In accordance with Decision 583 of August 10, 2016, item 6, GENERAL AND SPECIFIC OBJECTIVES, MAIN ACTIONS

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| 4.4. Periodical publishing/ dissemination of a report on disciplinary sanctions | Number of published/ disseminated reports | Delays in publishing/ dissemination; Reservation concerning the accuracy of the data; | Report published on intranet Dissemination list | Permanently | Organization's management | NA |

For signature, please refer to the original Romanian version

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