

SNGN ROMGAZ SA Integrity Plan

Annex to Decision No.70/24.02.2017

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/ Minutes/ Information note/ e-mail/ confirmation of knowledge list /	March 10, 2017	Organization's Management Integrity Plan Coordinator/ Project team appointed to implement SNA	NA
1.2 Employees' consulting in the process of identifying vulnerabilities to corruption within the organization ¹	Number of consulted employees as regards company specific risks and vulnerabilities to corruption - 100% of employees	Consultation formal in nature Employees not participating/ not involved	Questionnaire Proposals from employees	April 14, 2017	Organization's Management/Directors of Branches Integrity Plan Coordinator/ Project team appointed to implement SNA	NA
1.3 Updating the Risk Management procedure			Status communication letters	May 1, 2017	Risk Management Office	NA

¹ The results of the annual SCIM self-assessment questionnaires related to 2016 have been taken into account when preparing this Plan, and in the immediately subsequent period (to be completed on April 14, 2017) another round is going to take place to consult all employees. The Integrity Plan shall be updated if required by the outcomes of employee consulting.

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Gradual implementation within organizational units of the new unified methodology of corruption risks assessment as premises for the development of internal integrity plans.	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	
Risk Map preparation and publishing on the internal network			Risk Map	Permanently (based on identified risks)	Risk Management Office	
1.4 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
1.5 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
1.6 Periodical (annual) self-assessment of the implementation degree 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 Intermediate assessment in September 2017	Organization's Management , Integrity Plan Coordinator/ internal management control (questionnaire adjusted with the annual self-assessment)	NA
1.7 Section dedicated to integrity to be included in the company's webpage. The following to be published in such section:	Separate section created on the webpage Number of published materials	Delays in updating information. Delays in creating the separate section/ upload of	Company's webpage	March 30 2017	Organization's Management , Integrity Plan Coordinator	NA

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declaration on accession, Integrity Plan, self-assessment reports, information, examples of best practices in the field, etc.		data due to additional burdens of the involved personnel				
1.8 Enhanced activities to implement the internal/managerial control system	Number of risks mitigated by having procedures/ internal rules in place Number of inventoried sensitive positions (including corruption 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; Risks mitigated by having procedures in place; Inventoried corruption sensitive/ exposed positions; Risk register; Report on the internal/managerial control system as of 31.12.2017	Permanently	Organization's Management, Internal Managerial Control Office	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) ²	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 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	Permanently	Organization's Management , Integrity Plan Coordinator/ Project team appointed to implement SNA	NA

² Annex 3 to the 2016 – 2020 National Anticorruption Strategy

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			of Conduct applicable to the personnel			
1.11 Active implication of the Ethics Advisor in advisory activities for the organization's personnel	<p>Number of advisory meetings</p> <p>Number of information activities of the organization's personnel on ethics rules</p> <p>Number of employees informed by means of information actions on conduit standards</p> <p>Number of employees requesting advice on ethics</p> <p>Number of cases which have been the subject of advice on ethics</p> <p>Number of reports on conduit rules compliance</p> <p>Number of trainings attended by the Ethics Advisor with the aim of improving the activity in the field</p>	<p>Personnel reluctance/ lack of information to address the Ethics Advisor</p> <p>Insufficient financial resources to perform the activity and ensure access to professional training</p>	<p>Procedure on ethics advice of personnel</p> <p>Report on conduit rules compliance</p>	Permanently	Organization's Management Ethics Advisor	NA
1.12 Implementation at organizational level of a warning system of irregularities and potential acts of corruption (i.e. post box, allocated toll-free telephone numbers (green numbers), dedicated e-mail address)	<p>Number of internal rules harmonized with the provisions of Law</p> <p>Number of submitted warnings of acts of corruption:</p> <p>Type of acts which have been subject of corruption warnings</p>	<p>Misunderstanding of the concept "warning in the public interest"</p> <p>Failure to designate the person/structure to receive, analyze the warnings in the public interest</p> <p>Lack of periodical analyses of received warnings and setting up best practice actions based on analysis results</p> <p>Failure to implement the whistleblower protection mechanism</p> <p>Personnel's lack of confidence as regards protection of individuals exposing irregularities</p>	<p>Company's website</p> <p>Post box</p> <p>Allocated toll-free telephone numbers (green numbers)</p> <p>Dedicated e-mail address</p>	Permanently	Organization's management	NA
Objective 2: Enhancement of employees' anti-corruption education						

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2.1 Organizing/ implementing/ ensuring participation of all employees in programs to improve the anti-corruption awareness and education, on hierarchical levels, with external support, and dissemination of gained knowledge to all employees: (i.e. training sessions/ working groups in fields such as public procurement, ethics, ethics consultancy, financial management, human resources, transparency, access to public information, declaration of assets, conflict of interests, incompatibilities, internal-managerial control system, declaration of gifts, warning in the public interest, IT, 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	Permanently	Organization's management Integrity Plan Coordinator	To be estimated depending on the number of participants, content of program, etc.
2.2 Ensuring dissemination of information on risks and consequences of acts of corruption and integrity incidents. Legislative guidance, guides and compendium of cases in the field of conflict of interests/ incompatibilities and committed acts of corruption to be made available to employees	Number of informed employees Number of information sent Number of guides/ brochures/ leaflets prepared	Superficial handling of the information dissemination activity Delays caused by additional burdens of the responsible structures Limited access to compendium of cases, guides, etc.	Information notes Guides Brochures Leaflets Sent e-mails Dissemination lists Files published on intranet	Permanently	Organization's management Appointed personnel	To be estimated depending on the number of employees, dissemination way, (hard/ electronic copy/ e-mail), type of document (guide/ brochure/ leaflet etc) (own resources shall be used)
2.3 Conducting awareness	Number of conducted awareness	Failure to allocate necessary	Company's webpage	Permanently	Organization's	To be

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campaigns, organizing periodical debates on corruption prevention and promoting best anti-corruption practices	campaigns Number of organized debates Number of disseminated best practices	resources (budgetary and human) Poor level of interest and employees' participation	Activity reports Information material Minutes of working sessions		management Integrity Plan Coordinator	estimated depending on 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. ³	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 ⁴ 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 Consolidation of internal control and audit structures and 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	Annual activity reports	Permanently	Organization's management Head of Internal Audit Office Head of SCIM	To be estimated depending on the human resources required
4.2 Internal audit, every two years, of the corruption prevention measures system at organizational level	Number of formulated recommendations Implementation degree of anti-corruption preventive measures	Insufficient human resources	Audit reports Activity reports	Every two years (2018 onwards) ⁵	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	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

³ 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/>

⁴ As the case may be, depending on the type of the institution.

⁵ In accordance with Decision 583 of August 10, 2016, item 6, GENERAL AND SPECIFIC OBJECTIVES, MAIN ACTIONS

Measures	Performance Indicators	Risks	Sources of verification	Implementation deadline	Responsible for implementing	Budget
	repeatedly committed infringements					
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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