

SNGN Romgaz SA 2022 – 2025 Integrity Plan

Annex to Decision No. _____ / _____

General objective: Preventing corruption and integrity events within SNGN Romgaz SA

Measures	Performance Indicators	Risks	Sources of verification	Implementation deadline	Responsible for implementing	Budget
Objective 1: Enhanced implementation of integrity measures within the company						
1.1 Approving and distributing the integrity plan within the company, as well as publishing it on the company's website	Integrity plan approved and disseminated (e-mail, information note, meeting, etc.) No. of employees informed on the Integrity Plan approval Ways to inform the employees (i.e. meeting, e-mail, information note, etc.) Integrity Plan published on the company's website	Deficient communication	Integrity Plan approved	10.05.2022	Company's Management Integrity Plan Coordinator Project team appointed to implement NAS (National Anti-corruption Strategy)	NA
1.2 Preparing information materials for identifying and managing vulnerabilities, corruption risks respectively	No. of prepared documents No. of updated documents	Measures' formal nature	Prepared documents (procedures, Internal Resolutions, notes, etc.) Dissemination List	15.07.2022	Risks and Objectives Management Office Ethics Adviser Internal Management Control Office	NA
1.3 Identifying and evaluating risks and vulnerability to corruption specific to company's activities	Number of risks and vulnerabilities identified and evaluated	Measures' formal nature Insufficiently trained personnel to apply methodology Employees' resistance against new approaches Lack of a data collection mechanism	Corruption risks registry	Annually as of December 2022	All management positions Risks and Objectives Management Office Project team appointed to implement NAS	NA

<p>1.4 Identification and implementation of remedy measures of identified specific vulnerabilities</p>	<p>Number of implemented measures/ Number of identified remedy measures</p>	<p>Measures' formal nature Insufficiently trained personnel to apply methodology</p>	<p>Report on vulnerability remedy measures</p>	<p>Related to item 1.3</p>	<p>Heads of the departments responsible with remedy measures implementation Risks and Objectives Management Office Project team appointed to implement NAS</p>	<p>According to the identified remedy measures</p>
<p>1.5 Annual assessment of Integrity Plan implementation and adjustment with the newly identified risks and vulnerabilities – to be submitted to the hierarchical superior entity,</p>	<p>Integrity Plan implementing degree Newly introduced/reviewed measures</p>	<p>Assessment's formal nature Employees not participating/not involved</p>	<p>Assessment report Data base at BCM (according to standard self-assessment questionnaire 1 Ethics, integrity)</p>	<p>Annually</p>	<p>Company's Management Employees responsible with implementing the measures provided in the Integrity Plan Project team appointed to implement NAS</p>	<p>NA</p>
<p>1.6 Periodical (annual) self-assessment of the implementation status of institutional transparency and corruption prevention measures (Annex 3 to NAS – prevention measures inventory as well as assessment indicators)</p>	<p>Data and information collected for all indicators included in the measures inventory</p>	<p>Lack of a unified data collecting mechanism</p>	<p>Internal Management Control Department self-assessment questionnaire Self-assessment report</p>	<p>Annually</p>	<p>Company management Project team appointed to implement the NAS Other employees involved in the reporting requirements</p>	<p>NA</p>
<p>1.7 Improving the integrity dedicated section on the company webpage, where the following are to be published: the statement on undertaking the organisational integrity agenda, the Integrity Plan, etc.</p>	<p>Separate section created on the webpage comprising documents required to be published as a minimum.</p>	<p>Delays in updating information. Delays in creating the separate section/ uploading data due to overloading the involved personnel with other tasks</p>	<p>Company webpage</p>	<p>Permanently</p>	<p>Company management, Communication Office Ethics Adviser</p>	<p>NA</p>

1.8 Enhancing the implementation and development of the internal/management control system	Degree of compliance of the internal/management control system Total number of identified sensitive positions relative to the total number of positions within the company	Formal nature of the process Insufficiently trained personnel Employees' resistance to the new approach / new requirements	Development Schedule of the internal/management control system; List of sensitive positions; Risk Register; Report on the internal/management control system as of December 31	Permanently	Company management Internal Management Control Office	NA
1.9 Updating/correlating the Code of Conduct, Internal Rules and specific anti-fraud/anti-corruption rules prepared by the company.	Code of Conduct updated, disseminated and implemented	Formal nature of the process Poor participation/involvement of employees in the process of updating/correlating the document	Prepared activity 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	May 31 pursuant to GO 109/2011 Art. 29/13	Company management Ethics Adviser Members of the Committee appointed to implement the NAS	NA
1.10 Improving the identification, sanctioning and avoidance of incompatibility cases or conflict of interest	Setting up internal mechanisms/rules concerning prevention, communication and resolution of conflicts of interest and incompatibility cases	Formal nature of the process Delays in implementing such internal rules due to overloading the involved personnel with other tasks	Internal rules Minutes of Meetings Training Reports Dissemination List Reports	December 2022	Company management Ethics Adviser Members of the Committee appointed to implement the NAS	NA
1.11 Increasing the degree of knowledge and understanding of employees concerning the integrity standards	No. of counselling meetings No. of personnel information activities regarding ethics rules No. of employees informed through information actions concerning rules of conduct. No. of employees who	Personnel lack of information / reluctance to address to the ethics adviser Insufficient financial resources to carry out this activity and to provide access to professional	Report on compliance with the rules of conduct	Annual	Company management Ethics Adviser	NA

	requested ethics counselling No. of matters that were the subject of ethics counselling No. of reports on compliance with rules of conduct No. of trainings attended by the ethics adviser in order to improve this activity	training				
1.12 Ensuring implementation of institutional transparency and corruption prevention measures, concerning protection of the whistle-blower in the public interest	No. of submitted warnings concerning acts of corruption; Types of acts about which warnings were made concerning corruption;	Misunderstanding of the concept of “warning in the public interest” Failure to appoint the person/ structure to receive, review warnings in the public interest Lack of periodic reviews of received warnings and defining good practice actions based on results of reviews Failure to implement the mechanism concerning integrity whistle-blower protection Lack of confidence of personnel regarding identity protection	Company webpage Mail box Allocated free toll phone number Dedicated e-mail address	December 2022	Company management Ethics Adviser	NA
Objective 2: Enhancement of employees’ anti-corruption education						
2.1 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	Insufficient financial resources Poor participation Resilience	Activity reports Attendance lists Participation/ graduation certificates Minutes of work sessions	annually	Company's management Integrity Plan Coordinator Ethics Advisor	To be estimated depending on the number of participants, content of program, etc.

	superior level and/or competent structures					
2.2 Ensuring dissemination of information on risks and consequences of corruption acts and integrity incidents. Making available to employees of legislative Guidance on conflict of interest/ incompatibilities and corruption acts committed by the company's employees or similar activities.	Number of conducted awareness campaigns Number of organized debates Number of disseminated best practices	Failure to allocate necessary resources (budgetary and human) Poor level of interest and employees' participation	Intranet internal web (infoweb) Activity reports Information material Minutes of working sessions	annually	Company's management Ethics Advisor	To be estimated depending on the campaign type, size, target group etc.
Objective 3: Development of a transparency culture						
3.1 Publication in open format of the indicators of economic performance (including financing received from the hierarchical superior entity).	Number of published information items Data base available in open format on: - Financial data, - Performance indicators, - Letter of expectation, - Contract of mandate - Received financing	Lack of human resources Overburdening of the involved personnel by other duties	Company's webpage	annually	Company's management Appointed responsible persons	NA
Objective 4: Increasing the implementation rate of anti-corruption measures by approving the integrity plan and periodical self-assessment within SNGN Romgaz SA						
4.1 Institutional integrity consolidation by plans developed on the basis of the risk analysis and internal control standards	Approval and dissemination of the integrity plan within the company Annual assessment of integrity plan implementation and adaptation to the new risks and vulnerabilities.	Formality of the process	Approved integrity plan Implementation of measures included in the integrity plan, in accordance with set deadlines	Upon occurrence of new assumptions	Company's management Head of Internal Audit Office Head of Internal Management Control	To be estimated depending on the human resources required
4.2 Every two years, internal audit of the corruption prevention	Number of formulated recommendations	Insufficient human resources	Audit reports Activity reports	Every two years	Company's management	NA

system/measures within the company	Implementation status of anti-corruption preventive measures			(since 2018) ¹	Internal audit structure within the organization	
4.3 Imposing disciplinary dissuasive sanctions 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	Formality of the activity of the disciplinary commission Insufficient training/informing of personnel The practice of adopting the easiest sanctions/ no sanctions	Decisions of the prior Investigation Commission	Permanently	Company's management Prior Investigation Commission	NA

Chief Executive Officer

Prepared,
Cristina Gîdea

¹ In accordance with Decision No. 1269 of December 17, 2021 on approving the 2021-2025 NAS and its related documents