



AG

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NATURALE "TRANSGAZ" SA MEDIAȘ**

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Annex to Decision no.

**Integrity Plan of S.N.T.G.N.
Transgaz S.A.**

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1. Introduction

Integrity is a concept that relates to the manifestation of consistent actions, according to values, methods and elements of measurement, as well as reporting to principles and expectations that can be verified by results.

The perception of organizational integrity is influenced by the cumulative effectiveness of the integrity, publicly presented by individuals within the organization, which, although hampered by their apparent level of influence, creates an identifiable value: Integrity that others within or outside the organization perceive as an attribute of the organization. This is not a single-direction oriented process. The integrity identified in an organization has not been obtained as the consequence of a single decision. It was built over time (although it can be destroyed much faster) and is affected by the conduct displayed by all individuals in the organization.

S.N.T.G.N. Transgaz S.A. is the technical operator of the national gas transmission system, being responsible for its operation under conditions of quality, safety, economic efficiency and environmental protection, and aims to achieve the national strategy established for domestic and international gas transmission, natural gas dispatching and research-design in the field of natural gas transmission by carrying out, in compliance with the Romanian legislation, the acts of trade according to the object of activity approved by its Articles of Association.

Thus, preventing and combating fraud and corruption constitutes a priority for S.N.T.G.N. Transgaz S.A., which has a constant concern to improve its management quality by introducing effective measures to mitigate the corruption phenomenon. Of the main initiatives undertaken in recent years, we mention:

- Implementation of mechanisms and tools to reduce bureaucracy, increase transparency and strengthen integrity, requirements also undertaken through the Corporate Governance Regulation, updated on 29.04.2016, in line with the Corporate Governance Code of the Bucharest Stock Exchange;
- Regular monitoring and evaluation of the actions undertaken in this field and the implementation of the situation analysis reports;
- Adoption as a corporate governance motto: "A responsible company is a company of the future".

The general and specific strategic objectives of S.N.T.G.N. TRANSGAZ S.A. are set out in the context of aligning to the requirements of the new European energy policy on energy safety and security, sustainable development and competitiveness. In this context, the implementation and development of corporate governance principles, the development of responsible, transparent business practices, becomes increasingly a necessity in the foundation and application of the business strategies and policies of companies. By subscribing to this wish, S.N.T.G.N. TRANSGAZ S.A. Medias, aims to ensure a rigorous framework for sizing and regulating corporate governance at the company level.

In this context, it is important to continue the steps to prevent and combat corruption, both by promoting, developing and extending preventive measures and good practices previously identified and through a conjugated, multidisciplinary approach focused on promoting integrity.

S.N.T.G.N. TRANSGAZ S.A., by signing the declaration of accession to the fundamental values, the principles, objectives and monitoring mechanism of the national anti-corruption strategy 2016-2020,

- Condemns corruption in all its forms of manifestation;
- Assumes the fulfilment of specific measures under its legal competence.

The integrity plan of S.N.T.G.N. Transgaz S.A. was drafted in accordance with the provisions of G.D. No. 583/2016 on the approval of the national anti-corruption strategy for the period 2016-2020, the sets of performance indicators, the risks associated with the objectives and measures in the strategy and the sources of verification, the inventory of institutional transparency measures and the prevention of corruption, the assessment indicators and the standards for the publication of information of public interest

1.1 Definitions and abbreviations

The concept of integrity implies that in professional and business relationships: a-to be fair, righteous and honest; b-act honestly and according to reality; c- not to use information that:

- contain false or erroneous declarations (which could mislead consumers);
- are provided recklessly;
- d- not to use the information obtained in a reckless manner.

Corruption-is an active or passive abuse, committed by an employee of S.N.T.G.N. TRANSGAZ S.A. for the purpose of obtaining financial or other undue advantage for himself or for third parties.

Corruption covers a set of illicit, unethical activities or actions carried out not only by persons but also by various groups and organizations, public or private, in order to obtain material or moral advantages or a higher social status by using forms of abuse, coercion, extortion, deception, bribe, intimidation, threat, etc.

In S.N.T.G.N. TRANSGAZ S.A., by corruption we understand:

- The deed of an employee or a collaborator to promise, offer or give, directly or indirectly, to a decision-maker, a material advantage of any kind, for themselves or for another person who could provide a facility, with the

- purpose that this person fulfils or refrains from fulfilling an act, thereby infringing their employment obligations;
- The deed of an employee/collaborator or assimilated to request or receive, directly or through someone else, an undeserved material advantage of any kind, for themselves or for another person, or to accept the promise of such an advantage, in order for that person fulfils or refrains from fulfilling an act, in breach of their obligations as an employee.

Fraud-generic name given to the crime by which a person seeks to make a material profit from the violation of the law (e.g. by deception, embezzlement, theft, false, etc.) or to disregard the rights of another person (e.g. fraud in contract);

Bribery-Any form of reward given with the intent to influence any party to do something dishonest, illegal, unethical or not to fulfill its duties. Bribery can take many forms, including offering or accepting direct or indirect pay, services, excessive gifts, charitable donations, sponsorships or preferential treatment. Preferential payments are small payments made to ensure or hasten the obtaining of a service to which the payer actually has legal rights to receive.

S.N.T.G.N. TRANSGAZ S.A. Partner/Collaborator - any natural or legal person providing an activity for S.N.T.G.N. TRANSGAZ S.A. or its subsidiaries on the basis of a commercial contract (e.g. supplier of goods or services).

Risk of corruption-threat of corruption, targeting an employee, collective or activity, determined by specific causes/vulnerabilities and likely to produce an impact on the fulfilment of the objectives/activities of a structure

Employee of S.N.T.G.N. TRANSGAZ S.A. - any employee of S.N.T.G.N. TRANSGAZ S.A.- for the duration of the contract concluded with the organization, irrespective of its type (management contract, mandate or administration)- including temporary employees (leasing; part time; collaborators).

S.N.T.G.N. TRANSGAZ S.A. – The National Gas Transmission Company TRANSGAZ S.A.

Structure – the smallest organizational structure of S.N.T.G.N. Transgaz S.A.

Vulnerability-weakness in the regulatory or control system of specific activities, which could be exploited, underlying and being able to trigger a corruption offence. Unlike the threat, which is potential, the vulnerability/cause exists

permanently in the activity of a structure.

2. Aim of drawing up the Integrity Plan

The aim of drawing up the Integrity Plan is to identify critical elements in the field of preventing possible corruption in S.N.T.G.N. Transgaz S.A., threats, risks and vulnerabilities that can affect the proper functioning of the compartments of the company, as well as the solutions (actions) to be implemented in order to ensure a high level of protection of the company

At the same time, the document ensures the possibility of integrated coordination of actions and measures established by the superior management of S.N.T.G.N. Transgaz S.A., by prioritizing them according to the available resources (human, material and financial).

3. Objectives undertaken through the Integrity Plan

S.N.T.G.N. Transgaz S.A. Integrity Plan follows the fulfillment of the following general objectives, included in the National Anti-Corruption Strategy 2016 - 2020:

- Developing a culture of transparency for open government at central and local level;
- Increasing institutional integrity by including measures to prevent fraud and corruption as binding elements of managerial plans and their periodic assessment as an integral part of the administrative performance;
- Strengthening integrity, reducing vulnerabilities and mitigating risks of fraud and corruption in S.N.T.G.N. TRANSGAZ S. A.;
- Increasing awareness and understanding of integrity standards by employees and beneficiaries of public services;
- Enhancing the performance of combating fraud and corruption by administrative means
- Increase the degree of implementation of anti-corruption measures by approving the integrity plan and periodic self-assessment at the company level.

The following specific objectives are also pursued:

- Increasing institutional transparency and decision-making processes;
- Increased transparency of the use and management of public resources;
- Improving risk management capacity by linking instruments that impact early identification of institutional

risks and vulnerabilities;

- Increasing integrity, reducing vulnerabilities and risks of fraud and corruption in priority areas-public procurement, follow-up of investment/maintenance, human resources;
- Increasing integrity, reducing vulnerabilities and corruption risks in the business environment;
- Increasing the degree of anti-corruption education of the staff of the company;
- Increasing the level of information of the staff on the impact of corruption phenomenon;
- Strengthening administrative control mechanisms;
- Strengthening institutional integrity through plans developed based on risk analysis and internal managerial control standards.

4. The strategic framework assumed

4.1. Principles considered in drafting the Integrity Plan

The principles reflect how employees act, how they honor their obligations and what their lives are like, the behavior and choices that an individual makes, distinguishing an important thing from others by calling to its value. The exposure of the principles leads to what we want to do and how we want to do this. The implementation of the Integrity Plan will be based on a set of principles that will guide the behavior, attitudes, rights and way of duty performance of the person in charge with the implementation.

These principles are:

- *The principle of transparency*-implementation of the plan will be continuously geared towards maximizing the ways and possibilities for mutual information of decision-makers and employees to ensure the clarity and understanding of ongoing processes;
- *The principle of responsibility*-involves the assumption by the persons in charge with the implementation of the obligations to carry out the actions to the end with responsibility for the consequences;
- *The principle of competence*- the persons involved in the implementation of the plan will have the necessary knowledge and skills, and will be responsible for their actions;
- *The principle of professionalism*- will be shown by the quality of solving the problems based on competences, qualities and is characterized by the responsibility and approach towards a person's duties.

4.2. Strategic directions

In drafting the Integrity Plan the following strategic direction were taken into consideration:

4.2.1. Increasing the efficiency of mechanisms to prevent and combat fraud and corruption in managing the assets of S. N. T. N. Transgaz S. A.

4.2.2. An efficient use of financial resources by applying the control mechanisms of the public procurement process and securing quality goods, services and works.

4.2.3. Development of the Human Resources management system by applying the principles of meritocracy, impartiality and transparency in employment and promotion processes.

4.2.4. Providing quality services by ensuring integrity, professional and efficient management in the interests of the beneficiary.

4.2.5. Ensuring quality financial management achieved through a diverse, profound and accomplished analysis in a transparent process.

5. Evaluation of fraud and corruption risk

5.1. Fraud and corruption risk evaluation methodology

Fraud and corruption risk management activities aim at achieving the following objectives:

- a) The promotion of integrity, institutional transparency and the smooth deployment of specific activities;
- b) Establishing intervention priorities in the field of fraud and corruption prevention;
- c) Accountability by management staff on the implementation of prevention/control measures for fraud and corruption risks.

Fraud and corruption risk management involves taking the following steps:

- a) Personnel training;
- b) Identification and description of fraud and corruption risks;
- c) Evaluating fraud and corruption risks;
- d) Establishing risk prevention/mitigation and control;
- e) Implementation of risk prevention and mitigation measures;
- f) Periodic risk monitoring/control and revision;
- g) Reassessment of risks.

5.1.1. Estimation of the probability of materialization of risks of fraud and corruption

The estimation of probability is a qualitative element and is carried out by assessing the possibility of occurrence of risks by taking into account the qualitative factors specific to the context in which the objectives are defined and carried out. This can be expressed on a 3-level value scale, as follows:

Unlikely, probably very likely.

Factor	Score	Description	Indicators	
Very likely	3	Very likely to materialize >70% chances of occurrence	<ul style="list-style-type: none"> - It will undoubtedly happen, possibly in a frequent manner - imminent - will probably occur in many professional circumstances - it has happened in the past 	The risk of fraud and corruption is constantly present, due to the shortcomings in organizing, planning, supervision, control, training or formation of staff and the way in which the legal framework is conceived or applied in the business activity
Probably	2	Its occurrence can be kept in mind 35% - 70% chances of occurrence	<ul style="list-style-type: none"> - might occur in some professional circumstances - might occur occasionally - it has occurred elsewhere, in a similar field of activity 	The risk of fraud and corruption can sometimes arise (causes may be represented by deficiencies in the conduct of the activity, errors in understanding or application of specific working procedures)
Unlikely	1	Minimum, but not impossible; It is not known to have occurred <35% chances of occurrence	<ul style="list-style-type: none"> - can occur only in extraordinary professional circumstances - it is not expected to occur - its occurrence has not been notified in the field of activity - it may never occur 	The risk of fraud and corruption occurs only rarely, under exceptional conditions of activity.

5.1.2 Global risk impact estimation

The estimation of the impact is a quantitative element and is carried out by assessing the effects of the risk if it materialized, by taking into account the quantitative factors specific to the financial nature of the context in which the objectives are achieved. This can be expressed on a value scale, on 3 levels, as follows: *low impact, moderate impact, high impact*.

Factor	Score	Indicators	
High	3	<ul style="list-style-type: none"> - impossibility to achieve the objectives set for the field of activity - Long-term deterioration of activity efficiency, major delays in the planned activities (more than 6 months) - Significant financial losses for the replacement or training of staff, change in procedures for the operation of the business, unplanned procurement of technical means, etc. - Negative publicity at national and international level, the involvement of political factors at central/local or institutional level to manage the situation created. - The medium-term disturbance of the activity, significant delays in the normal operation of the activity (between 3-6 months). 	<p>The risk of fraud and corruption contributes directly to the emergence or proliferation of corruption, facilitating or determining staff to commit such acts.</p>
Moderate	2	<ul style="list-style-type: none"> - Professional objectives partially achieved, significant impairment of its effectiveness - Short-term disruption of activity - Moderate financial loss for the structure - Negative publicity at national level. - Impact on achieving objectives - negligible, insignificant interruption of the activity 	<p>The risk of fraud and corruption can generate favorable parameters for the emergence or proliferation of fraud and corruption acts.</p>
Low	1	<ul style="list-style-type: none"> - Minimal or insignificant impact on the achievement of the objectives - no disruption to the activity calendar - insignificant or minimal financial losses for the structure - susceptible to lead to/cause negative publicity 	<p>The risk of fraud and corruption contributes little or zero to the emergence or proliferation of fraud and corruption acts.</p>

5.1.3. Determination of risk level

The determination of the total risk score and the pursuit of whether it falls within the risk appetite, agreed by the management of the organization, shall be carried out as the product between probability and risk impact obtained on the basis of the formula: $PT = P \times I$, where: PT = Total risk score, P = probability, I = impact

The following matrix shall be used to establish the total risk score:

Very likely (3)	3	6	9
Probably (2)	2	4	6
Unlikely (1)		2	3
Impact probability	Low (1)	Moderate (2)	High (3)
Calculated risk level	Level	Score	
	Low	1-3	
	Moderate	4-6	
	Critic	9	

Depending on the results obtained from the risk measurement process, applied to all risks the organization faces and that affect the achievement of the objectives, they will be divided into: very low risks, low risks, moderate risks, high risks and critical risks:

- > for PT between 1 and 3, the risk is low, tolerable, no control measures required
- > for PT between 4 and 6, the risk is moderate, tolerance is high and long/medium term control measures are required
- > for PT 9 the risk is critic, tolerance is low, urgent control measures are needed.

Following the risk-grading process, proposals for solutions to combat them shall be drawn up.

5.2. Risk analysis

In order to carry out the risk analysis the collection of information was performed in February 2017 and consisted

of two stages: the research stage and the interviewing of management from all departments of the company involved or who come in contact with major risk areas.

The research stage involved the study of recent specialty literature in the field of preventing and combating corruption and fraud, compliance and integrity. The main bibliographical resources were studied together with manuals and tools developed by international bodies. The instruments tested and applied by experts in the field of risk analysis of corruption and fraud were analyzed.

Another phase of the information collection process was carried out through **questionnaires and brainstorming**, by which potential risks of corruption and fraud were structured in activities and specific areas of the company.

A total of 33 questionnaires were filled in to assess *the degree of vulnerability to corruption* of the activities within S.N.T.G.N. Transgaz S.A.

From the analysis of the questionnaires as well as from the discussions with the managers of the main structures of the company 8 main risk areas were identified, as follows:

- Human Resources
- Procurement
- NTS operation
- Following up on works
- design
- Corporate Governance
- Legal
- Audit.

The risks identified in the above-mentioned areas are:

In Human Resources area:

- > The possibility of non-compliance with the criteria of competency upon employment
- > possibility of pressure to promote certain employees on incorrect criteria
- > Fail to declare a conflict of interest.
- > > Lack of knowledge related to integrity, integrity incidents, whistle-blower, corruption, fraud, etc.
- > Lack of training on vulnerabilities in corruption, professional ethics and prevention and combating corruption;
- > The salary system not adapted to the tasks, responsibilities and risks of the management function;
- > The lack of a system to reward outstanding results, the unitary remuneration of employees without taking into account the professional responsibilities and results of each person;

In design area:

- > possibility to favor a particular manufacturer when drawing up technical specifications
- > non-compliance with the Code of Ethics and the transmission of confidential information to third parties

In procurement area:

- > The possibility of exercising external influences on the process of drafting the award documentations.
- > The possibility of exercising external influences on the work of the evaluation committees.
- > Sub dimensioning of tenders evaluation committees.

In operation area:

- > Possibility of validation, by Minutes, of unverified quantities of natural gas

In works area:

- > Possibility of faulty follow up of works by the site masters.

In legal area:

- > Lack of appropriate process procedure at the level of the Legal Department

In Audit area:

- > The possibility of influencing the final conclusions of an audit report.
- > Possibility of influencing the final conclusions of an audit report.

In Corporate Governance area:

- > Limited transparency as regards information of public interest
- > Failure of the management to take responsibility for the prevention of corruption, bribery and anti-bribery
- > formal application of corruption prevention measures
- > The lack of effective managerial internal control to ensure the proper application of all internal/legal regulations and a high level of staff integrity;

Following the consultation of the expert groups within the company, the analysis of the questionnaires completed by each company structure, as well as the follow-up of the methodology presented the following risk levels have been established:

No.	Risk area	Risk	Exposure to risk		
			Probability	Impact	Risk level
1.	Human Resources	The possibility of non-compliance with the criteria of competency upon employment	1	2	2
		Possibility of pressure to promote certain employees on incorrect criteria	• 1	2	2
		Lack of training on vulnerabilities in corruption, professional ethics and prevention and combating corruption	2	2	4
		The salary system not adapted to the tasks, responsibilities and risks of the management function;	2	2	4
		The lack of a system to reward outstanding results, the unitary remuneration of employees without taking into account the professional responsibilities and results of each person	1	2	2
		Failure to declare a conflict of interest	1	0	3
		Lack of knowledge related to integrity, integrity incidents, whistle-blower, corruption, fraud, etc.	3	2	6
2.	Design	possibility to favor a particular manufacturer when drawing up technical specifications	2	2	4
		non-compliance with the Code of Ethics and the transmission of confidential information to third parties	2	3	6

3.	Procurement	The possibility of exercising external influences on the process of drafting the award documentations.	1	3	3
		The possibility of exercising external influences on the work of the evaluation committees.	2	3	6
		Sub dimensioning of tenders evaluation committees.	1	2	2
4.	Operation	Possibility of validation, by Minutes, of unverified quantities of natural gas	1	3	3
5.	Works follow up	Possibility of faulty follow up of works by the site masters	2	3	6
6.	Legal	Lack of appropriate process procedure at the level of the Legal Department		3	3
7.	Audit	The possibility of influencing the final conclusions of an audit report.	1	2	2
		Possibility of influencing the final conclusions of an	1	2	2
8.	Corporate Governance	Limited transparency as regards information of public interest	1	1	1
		Failure of the management to take responsibility for the prevention of corruption, bribery and anti-bribery	2	2	4
		formal application of corruption prevention measures	1	3	3
		The lack of effective managerial internal control to ensure the proper application of all internal/legal regulations and a high level of staff integrity;	1	3	3

6. Measures proposed following risk analysis

To reduce the identified risks, the following measures have been proposed:

In Human Resources area:

1. Organizing training courses on integrity, corruption and fraud issues.

In Procurement area:

1. Implementation of Open Contracting Data Standard in Procurement (JSON).
2. Task Hierarchical Control.
3. Application of the '4 eyes' principle in verifying documents entering and leaving a department.

In operation area:

1. Implementation of an appropriate Process procedure.
2. Periodic process assessment activities.

In design area:

1. Conduct, on a random basis, verifications/checks, by the management staff and the heads of departments, of the activity of the subordinated employees.

In Legal area:

1. Implementation of an appropriate process procedure.

In Corporate Governance area:

1. Updating the company's website in accordance with the memorandum "increasing transparency and standardizing the display of information of public interest".
2. The participation of employees who have powers to provide information of public interest in order to increase their capability, to training and improvement programs (relevance of information).
3. Initiating an information campaign for employees on the corruption phenomenon.

7. Integrity Plan

Integrity Plan of SNTGN TRANSGAZ SA							
NO	Action	Performance Indicators	Risks	Verification Sources	In charge	Resources	Deadline
General Objective 1 - Development of a culture of transparency for open government at central and local level							
Specific Objective 1.1. • Increasing institutional and decision-making processes transparency							
1.1.1.	Updating the company's website in accordance with the memorandum "increasing transparency and standardizing the display of information of public interest"	Website operational	Limited transparency with regard to information of public interest	www.transgaz.ro	DSMC	Within the limit * of the approved budget	Procurement procedure started Deadline Quart. IV 2017
1.1.2.	The participation of employees who have powers to provide information of public interest in order to increase their capability, to training and improvement programs (relevance of information).	no. of training courses organized no. of attendants	Posting irrelevant information on the company's website;	Training course evaluation report	DSMC+ DORU	Within the limit of the approved budget	Quart. IV 2017
Specific objective 1.2. - Increasing transparency of public resource management processes							
1.2.1.	Implementing Open Contracting Data Standard in Procurements (JSON)	Data provided in the requested format	ADDR refusal to publish the procurement	ADDR website	DASC		When implemented by ADDR
1.2.2.	Publication of technical indicators alongside financial ones for projects financed from non-refundable external funds	Published data	Limited transparency with regard to information of public interest	www.transgaz.ro	DAFERI		Quart. III 2017

General Objective 2 - Increasing institutional integrity by including measures to prevent corruption as binding elements of managerial plans and their periodic assessment as an integral part of the administrative performance							
Specific Objective 2.1. - Improving capacity of dealing with management failure by linking instruments that have an impact on the early identification of institutional risks and vulnerabilities							
2.1.1.	Drafting of corruption prevention policy	Policy drafted	Failure of management to assume responsibility for the prevention of corruption	www.transgaz.ro	DG, DSMC		Quart. III 2017
2.1.2.	Drafting of a corruption prevention procedure	Procedure drafted	Formal application of corruption prevention measures	Procedure drafted and implemented	SIG		Quart. 12018
2.1.3.	Elaboration of a methodology for evaluating the risk of corruption	Methodology drafted	Possibility of ignoring the risks of fraud and corruption and/or timely failure to take the necessary measures	Methodology drafted and implementing	Committee appointed by Decision of DG		Quart. 112018
2.1.4.	Publication of the results of the SCIM assessment and the indicators of each standard	Information published	Limited transparency with regard to information of public interest	intranet	DSMC		Quart. 12018 Quart. 12019 Quart. 12020
General Objective 3 ■ Consolidation of integrity, reduction of fraud and corruption risks within TRANSGAZ S.A.							
Specific Objective 3.6. ■ Increasing integrity, reducing vulnerabilities and risks of fraud and corruption in priority areas • Procurement							
3.6.1.	Creation of a database of companies that did not properly execute TRANSGAZ contracts following public procurement procedures	Database created	Possibility of accepting and in the future of relationships with partners who did not properly execute the contracts concluded	www.transgaz.ro	DASC, DTIC	Within the limit of the approved budget	Quart. 112018

Specific Objective 3.7, ■ Increasing integrity, reducing vulnerabilities and risks of fraud and corruption in the business environment							
3.7.1.	Developing an anti-bribery policy at the company level	Policy drafted	Failure to take responsibility by management on bribery and anti-bribery	www.transgaz.ro	DG, DSMC		Quart. 112018
3.7.2.	Identifying and assimilating best practices in the OECD Best Practice Guide	Best Practice identified	Lack of good anti-bribery practices	Integrity Plan approved	SIG		Quart. 112018
General Objective 4 - Increasing awareness and understanding of public integrity standards by employees and beneficiaries of services							
Specific Objective 4.1. * Increasing the degree of anti-fraud and anti-corruption education of Company staff							
4.1.1.	Organizing training courses on integrity, corruption and fraud issues	no. training programs/ no. of attendants	1. Lack of knowledge of integrity, integrity incidents, whistle-blower, corruption, fraud, etc. 2. The relatively low level of interest of employees on consultations and debates for the dissemination of good practices on integrity and the fight against corruption.	Course evaluation report	SIG + DORIJ	Within the limit of the approved budget	Sem.112017 - management; 2018 execution staff
4.1.2.	Initiating an information campaign on the phenomenon of fraud and corruption	No. and type of activities/ types of messages	Low level of knowledge of the phenomenon of fraud and corruption	Surveys /post attendance evaluations /Annual Reports	SIG+DSMC	Within the limit of the approved budget	Sem. II 2017 - management 2018 execution staff

General Objective 5 - Strengthening the anti-corruption performance by criminal and administrative means							
Specific Objective 5.3. - Strengthening administrative control mechanisms							
5.3.1.	Identification of areas with high risk of fraud and corruption within the company (methodology developed by an external consultant)	No. of identified areas; calculation of residual risk	Vulnerability to fraud and corruption	Methodology on corruption risk management	DSMC+ DASC	Within the limit of the approved budget	sem 12018
5.3.2	Prioritizing audit and control actions by increasing their share in areas exposed to fraud and corruption	No. performed controls/total no. No. Audit reports/Total planned missions	Possibility of new acts of fraud and corruption in high-risk areas (e.g. works follow up, design, human resources, procurement)	Control reports/Annual activity, audit and control reports	SIG/SAI		Quart. 12018
General Objective 6 • Increasing the degree of self-assessment of anti-fraud and anti-corruption measures at the Company level by approving plan C							
Specific Objective 6.1. ■ Strengthening institutional integrity through plans developed on the basis of risk analysis and internal/managerial control standards							
6.1.1.	Adoption and distribution within the company of the declaration of accession to the SNA	Declaration published and distributed	Lack of participation of employees in the process	www.transgaz.ro	SIG		Quart. IV 2016
6.1.2.	Consultation of employees in the process of drafting the Integrity Plan	No. of consulted employees, see how the consultation takes place	Lack of participation of employees in the process	survey	SIG		Quart. 12017
6.1.3.	Approval and distribution within the company of the Integrity Plan	Integrity Plan approved and distributed	Lack of involvement of employees in the development of the Integrity Plan	intranet	SIG		Quart. 112017

6.1.4.	Annual assessment of the implementation of the integrity plan and its adaptation to newly emerging risks and vulnerabilities	No. of newly identified risks and vulnerabilities	formal character of the Integrity Plan	Annual report	SIG		Quart. I 2018, Quart. I 2019, Quart. I 2020,
6.1.5.	Annual publication of the performance indicators monitored under the company's Integrity Plan	Data published	formal character of the Integrity Plan	www.transgaz.ro	SIG		Quart. 12018 Quart. 12019 Quart. 12020
6.1.6.	Semester evaluation of the SCIM implementation stage	No. of standards implemented at the company level /total no. of standards	formal character of SCIM	Semester report	DSMC	-	Quart. III 2017 Quart. III 2018 Quart. III 2019 Quart. III 2020 Quart. III 2020

LEGEND:

DG - Director General

DSMC – Strategy and Corporate Management Unit

DORU – Organization and Human Resources Unit

DTIC – IT and Communication Unit

DASC – Sectoral Procurement and Contracting Unit

DAFERI – EU Funds Accessing and International Relations Unit

SIG – General Inspection Service

SAI – Internal Audit Service

SCIM – Internal Managerial Control Service