

## METHODOLOGY FOR EVALUATING INTEGRITY INCIDENTS WITHIN SNTGN TRANSGAZ SA

### 1. SCOPE

This evaluation methodology aims at the ex-post evaluation of the integrity incidents within SNTGN TRANSGAZ SA by obtaining and analyzing relevant information and proposing prevention and control measures. The evaluation of integrity incidents is the work carried out by the manager designated for this purpose by the leader of the company, consisting in obtaining and analyzing relevant information on integrity incidents and proposing preventive and/or control measures

### 2. DEFINITIONS

For the purpose of this evaluation methodology, the terms below have the following meanings:

a. Corruption threat – the corruption action or event occurring within a specific activity of SNTGN TRANSGAZ SA or one of its organizational structure;

b. Integrity incident – one of the following events regarding the situation of one of SNTGN TRANSGAZ SA employees:

i. The disciplinary termination of the Labor contract due to an act of corruption that represents a breach of the Internal Regulations or any other legal provisions that stipulate such sanction;

ii. The prosecution or conviction for committing a corruption offence or an act relating to non-compliance with the regime of prohibitions, incompatibilities, conflict of interest or declaration of wealth; the definitive conclusion of a fact-finding report issued by the National Integrity Agency, referring to breaches of legal obligations relating to unjustified wealth, conflict of interest or incompatibilities regime;

c. prevention and/or control measures - All actions ordered by the management of SNTGN TRANSGAZ SA in order to remove or keep under control the vulnerabilities identified following the occurrence of an integrity incident, namely to prevent the occurrence of integrity incidents similar to those produced;

d. Corruption risk assessment process - series of actions that identify, evaluate, prioritize and manage through targeted intervention measures, vulnerabilities and risks to corruption within SNTGN TRANSGAZ SA;

e. Person in charge for implementing the methodology - person, working group within SNTGN TRANSGAZ SA, which carries out the activity of obtaining and analyzing relevant information on integrity incidents and proposes preventive and/or control measures;

f. Risk of corruption -the likelihood of a corruption threat materializing, targeting an employee, a professional collective or a field of activity, determined by the specific tasks and likely to produce an impact on the fulfilment of the objectives or activities of SNTGN TRANSGAZ SA;

g. Vulnerability-weakness in the regulatory or control system of activities, which could be exploited, leading to the emergence of a corruption act.

### **3. REGULATORY FRAMEWORK**

The present methodology was drafted according to the Methodology for evaluating integrity incidents within central public authorities and institutions endorsed by Government Decision no. 599 from 2 August 2018.

### **DESCRIPTION OF THE INTEGRITY INCIDENT EVALUATION ACTIVITY**

#### **4. TASKS OF THE PERSON IN CHARGE FOR IMPLEMENTING THE METHODOLOGY**

The person in charge for implementing the integrity incidents evaluation methodology is appointed by the Director of SNTGN TRANSGAZ SA by an internal decision.

The person in charge for implementing the methodology carries out the following activities:

- a) obtaining information on the integrity incident;
- b) analysis of the integrity incident;
- c) proposes prevention and/or control measures.

#### **5. OBTAINING INFORMATIONS ABOUT THE INTEGRITY INCIDENT**

(1) The management of SNTGN TRANSGAZ SA, the Organization and Human Resources Department, General Inspection Unit, Legal Unit or any other structures within the Company that hold information regarding any measures taken vis-à-vis an integrity incident, inform the person in charge with the implementation of the methodology and provide all information or documents necessary to evaluate the integrity incident, within 30 days from becoming aware of the respective integrity incident.

(2) If considered necessary, the person in charge with implementing the methodology may request information from the National Integrity Agency, the National Anti-Corruption Directorate, the District Attorney's office attached to the High Court of Cassation and Justice and other authorities or public institutions holding information on the integrity incident.

#### **6. CONTENT OF THE INTEGRITY INCIDENT ANALYSIS**

(1) The analysis addresses, mainly, the following aspects:

- a) The type of event representing the evaluated integrity incident;
- b) The department/direction/unit where the integrity incident occurred and the title of the person who committed it;
- c) Status and modus operandi;
- d) Applicable legislative framework and internal procedures within SNTGN TRANSGAZ SA relevant for the incident analyzed;
- e) The causes of the integrity incident, by reporting to threats and vulnerabilities identified in the corruption risk assessment process, as well as those related to the integrity incident evaluated;
- f) Duration of the investigation procedure of the facts constituting disciplinary misconduct;
- g) Disciplinary, administrative or, where applicable, criminal penalties imposed;
- h) Effects of the integrity incident on the employment relationship of the person who committed the integrity incident;

- i) The impact of the incident on the activity of SNTGN TRANSGAZ SA.
- (2) Based of the information obtained, the person in charge with the implementation of the methodology will draw up, for each integrity incident, a report containing the information referred to in para. (1), proposals for measures to prevent the occurrence of a similar incident, as well as the person in charge person and timeframe for the implementation of the proposed preventive and/or control measures.
- (3) The report mentioned in para. (2) will be sent for approval to the management of SNTGN TRANSGAZ SA.

#### **7. VERIFYING THE IMPLEMENTATION OF RECOMMENDATIONS**

The management of SNTGN TRANSGAZ SA will order the quarter verification of the way in which the measures approved as per the provisions of art. 6 para. (2). The information will be included in a report by the person in charge for implementing the methodology.

#### **8. REPORTING TO THE TECHNICAL SECRETARIAT OF THE NATIONAL ANTI-CORRUPTION STRATEGY**

The person in charge with the implementation of the methodology will draw up an annual report on the evaluation of the integrity incidents, which will be approved by the management of SNTGN TRANSGAZ SA, will be published on the company's website and will be forwarded to the Technical Secretariat of National anti-Corruption Strategy by 31 March of the following year. The content of the report is set out in Annex No. 1.

#### **9. CAPITALIZATION OF THE INFORMATION GATHERED IN THE PROCESS OF EVALUATING CORRUPTION RISKS**

- (1) The data included in the report mentioned in art. 8 is capitalized in the corruption risk evaluation procedure carried out in SNTGN TRANSGAZ SA.
- (2) The Integrity Plan of SNTGN TRANSGAZ SA is updated yearly, according to the prevention and control measures mentioned in art. 6 para. (2).

APPROVED

DIRECTOR GENERAL

Annual report on the evaluation of integrity incidents at  
SNTGN TRANSGAZ SA for year.....

### I. Integrity incidents

Total number of integrity incidents		
Type of breach	No of deviations from the rules of ethics or other similar provisions designed to protect the integrity of the public function	
	No. of corruption offences or facts relating to non-compliance with the prohibition, incompatibilities, conflict of interest or declaration of assets	
	No. of violations of legal obligations relating to unjustified wealth, conflict of interest or incompatibilities regime	
Department / Direction/ Unit where integrity incidents occurred		
Titles of persons who committed integrity incidents	No. of acts committed by persons with managerial positions	
	No. of acts committed by persons with execution positions	
Number of sanctions applied	No. of disciplinary sanctions	
	No. of administrative sanctions	
	No. of penal sanctions	
Average duration of the investigation procedures of the facts constituting disciplinary misconduct		

### II. Prevention and/or control measures

Total number of proposed measures :	
Description of measures	Implementation stage
1.	
2.	
3.	

Person in charge with implementation