



## **Final Report of Factual Findings** National Integrity Agency

External audit of ANI management for the year 2016  
April 2017

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## 1. Executive Summary

### Introduction

According to contract no. 17920 from February 27, 2017 (hereinafter "the Contract"), SC Deloitte Audit SRL (hereinafter "Deloitte") was engaged by the National Integrity Agency (hereinafter "ANI", "the Agency") to perform the external audit on ANI's management, as required in art. 32 paragraph (1) of Law no. 144/2007 and the provisions included in Law no. 176/2010 on the integrity in exercising public functions and dignities, for the amendment and supplementation of Law no. 144/2007 on the establishment, organization and functioning of ANI and for the amendment and supplementation of other acts of legislation (hereinafter "Law no. 176/2010").

The agreed work phases in the Initial Report for performing the engagement were:

- Understanding the engagement's scope;
- Planning the work program;
- Performing the work program;
- Forming the conclusions and drafting the factual findings report.

### Engagement's objectives and applicability area

The quality of ANI's management was assessed during the 1<sup>st</sup> and the 31<sup>st</sup> of March 2017, by a team of Deloitte qualified professionals, based on interviews, examination of documentation and detailed tests.

During the engagement, Deloitte's team performed the fieldwork in close cooperation with ANI representatives, in order to achieve the goals stated in the technical tender book.

The project was performed in accordance with:

- The terms of reference included in the technical offer "External audit of ANI's management for the year 2016", Appendix to the Contract;
- International Standards on Related Services (ISRS) – 4400 Engagements to perform agreed – upon procedures;
- Legal framework applicable to ANI.

The reference period for this report is the year 2016 exclusively, unless otherwise mentioned.

### Procedures performed and factual findings

We have planned and performed the verifications in accordance with the objective and scope of this engagement, and with the agreed-upon procedures, as they are detailed in Chapter 3 – "Approach" of this Report. All the procedures detailed in Chapter 3 have been performed in accordance with the terms agreed within the Contract.

Following the agreed upon procedures performed, we obtained sufficient and appropriate evidence to draft a factual findings report in accordance with the International Standards on Related Services (ISRS) – "4400 Engagements to perform agreed – upon procedures". The procedures performed during this engagement are neither a financial audit, nor a review and thus we do not express any assurance regarding ANI's quality of management and financial statements for the year ended December 31, 2016.

## Observations identified in 2016

Total deficiencies with major impact	0
Total deficiencies with medium impact	5
Total deficiencies with minor impact	3
Value-added recommendations	3

We have also assessed the remediation status of the deficiencies identified during the external audit of ANI management for the years 2009, 2010, 2011, 2012, 2013 and 2014 that were not assessed as "implemented" as at 31.12.2015, the implementation status of the recommendations for the 2015 external audit of ANI management, as well as the implementation status for the measures within the Action Plan for the implementation of the Strategy for control and prevention in accumulating unjustified assets, conflict of interest and incompatibilities.

The remediation status of the deficiencies formulated in the factual findings report for the years 2009 – 2015 is presented within the table below:

Total number of deficiencies for which the recommendations have been implemented	17
Total number of deficiencies for which the recommendations have been partially implemented	13
Total number of deficiencies for which the recommendations have not been implemented	4
Total number of recommendations the implementation of which could not be assessed	1
Total number of deficiencies the risks of which are accepted by the ANI management	2

## Findings

The results of the application of the agreed-upon procedures performed according with the International Standards on Related Services (ISRS) – 4400 Engagements to perform agreed – upon procedures, are presented within this report.

Following the assessment of ANI's activity performed during the year 2016, we have identified ANI's functionality parameters, which are based upon ANI's management efforts made because of the changes at the management level, efforts to improve the processes and to increase the efficiency of the activity in order to achieve the objectives planned. The results were as follows:

- Activities arising from the election campaign in 2016
  - In the context of the 2016 local elections, with the assistance of the Interior Ministry, ANI organized a video call with all the prefects from the territory, with the purpose of optimizing the interest and assets statements completion and submission process, and disseminating useful information on improving transmission flow to ANI for the assets and interest statements.
  - However, in order to clarify the difficulties in completing the statements and improve the system of reporting and submission of the assets and interest statements, ANI has provided to all the prefect counties electronic forms of the assets and interest statements, Guide on completing the assets and interest statements, guide regarding the incompatibilities and conflict of interest.
  - Integrity inspectors were nominated to respond to a special telephone line, providing specialized assistance to the candidates with reference to the legal regime of assets and interest statements completion, incompatibilities and conflict of interest.
  - ANI updated the Guide on completing the assets and interest statements as well as the Guide regarding the incompatibilities and conflict of interest, available on the Agency website.

- The Assets and interest Statements submitted in the context of 2016 elections (520.000 statements of the local elections candidates and approximately 11.490 statements of the parliamentary elections candidates), were collected, processed and published in a separate section on the Agency website.
- Development of the Strategy regarding the prevention and sanctioning of the conflicts of interest, incompatibilities and unjustified assets for the period 2016-2020;
- Finalizing the PREVENT implementation system project for which there is legislative framework since October 20, 2016, Law 184/2016;
- Achieving a 84% percentage regarding the "Implemented" and "Partially Implemented" status of the recommendation made to improve the activity;
- As far as Information technology Department activities are concerned, the entire procedural framework has been revised and updated to allow a better control over areas within the scope of competence
- Finalizing 92% of the evaluation files started in the previous years (2010, 2011, 2012 and 2013);
- Transfer of good practices and strengthening the international cooperation with institutions from the prevention and combating corruption domain, similar with ANI's competences;
- Training all ANI's staff in accordance with the necessary trainings identified following the professional performance assessment;
- Straightening the communication with the public by introducing the Newsletter section on ANI's Website.

Areas where remediation action is required from management addresses the following aspects, noted as result of the verification performed:

- Agency lacks an entire spectrum of competences required to manage the systems/technologies it is currently using. Consequently, continuity in managing and operating the IT systems depends on the services provided by external suppliers.
- Work and storage space is insufficient;

**April 21, 2017**

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For signature, please refer to  
the Romanian version

## 2.Objectives and Scope of the Project

According to the Contract, engagement's specific object, as defined in the Tender Documentation, is to add value, by taking an objective picture of the real activities performed within ANI, and improve the overall National Integrity Agency management.

## 3.Project approach

Based on the project's specific objectives, we performed the engagement in four phases, as follows:

1. Planning the engagement;
2. Developing the work program;
3. Performing the work program;
4. Reporting results.

### 3.1. Planning

During the planning phase, we performed the following steps:

- Drafted the preliminary request for information;
- Organized the „kick-off meeting“;
- Determining the professional standards applicable to the engagement;
- Obtaining the necessary information for designing the evaluation program and for the preliminary analysis of the risks identified in this phase.

On February 28, 2017, before the beginning of the fieldwork, we organized, at ANI's headquarters, a kick-off meeting with the following results:

- Presenting the team members involved in the project, both from ANI's side and Deloitte's side, and their responsibilities;
- Agreeing the deadlines for performing the procedures and for reporting;
- Agreeing the communication protocol between Deloitte and ANI team throughout the project.

### 3.2. Developing the engagement plan

In this phase, we assessed the internal procedures and controls in order to plan the evaluation. Based on the analysis of the documents made available to us, we developed the verification plan following the structure presented below:

- **Identifying the areas subject to verifications**, including the main activity directions of ANI (verifying the assets, conflict of interest and incompatibilities) as well as the support activities (internal audit, finance, legal, human resources, and public relation).
- **Drafting the interview plan in order to identify the specific risks**, including the format and the content of the interview templates with the relevant personnel. Please refer to Appendix 1 for a complete list of interviewed personnel.
- **Identifying verification techniques to be used** through:
  - The preliminary analysis of the decision making process, of the actions taken during the year 2016, in order to use these in the sampling process; based on this analysis, we drafted the testing strategy so that the processes under evaluation are relevant for the scope of our project;
  - Asserting the format and content of the detail testing.

By the end of these two phases, on March 8, 2017, we delivered the Initial Report to ANI's management for approval, in which we made a presentation of the verification procedures applicable to each ANI structure, sampling methodology and engagement planning phases.

### 3.3. Performing the verification procedures

During this phase, we performed the procedures agreed upon with ANI management that included tests and interviews in order to conclude whether policies, procedures and systems are compliant with national legislation in force, as well as best practices in the area.

The verification procedures have been performed on a sample of management actions and in several stages, as follows:

- a. Sampling;
- b. Verification of the fulfilment of management duties by ANI management, on the basis of the sample selected:
  - Verification of procedural rules application,
  - Analysis of ANI organization effectiveness considering its objectives,
  - Verification of the communication system within ANI,
  - Analysis of management decisions instrumentation.
- c. Analysis of the Agency's personnel workload;
- d. Verification of the information system for assessing the degree it fulfils the necessities deriving from the specific activities the Agency has to achieve;
- e. Phases of management quality assessment procedure – verification of the existence and adequacy of the following elements:
  - reporting chart/matrix,
  - decision making system within ANI,
  - documents workflow,
  - operating procedures,
  - duties and responsibilities, limitations and delegations of competence, relationship chart/matrix, clearly formulated in the Internal Organization Manual and in the mandate contracts of the persons within ANI management during 2016.

Our verification plan included verification procedures as follows:

- **Knowing and understanding the internal regulations and procedures**

During this phase we analyzed the Internal Organization Manual approved by ANI President through Order no 7962/4.05.2016 regarding the reorganization of ANI by comparing their provisions to Law no 144/2007, as well as with the provisions of Law no 176/2010 regarding the integrity in the exercise of public functions and dignities for modifying and completing Law no 144/2007 on the establishment, organization and functioning of ANI and to amend and supplement other regulations (hereinafter "Law no 176/2010"), we became familiar with the internal operating regulations and procedures, we identified the responsibilities for each department, tasks allocation, compliance with applicable laws, etc.

We mention that the ROF is the document that sets up ANI's organizational structure, the duties, tasks and responsibilities of ANI's employees. The document is approved by an Order issued by the President and is in conformity with the provisions included in Law 144/2007, art 6 para 4.

Please refer to Appendix 2 for a complete list of the operating procedures examined.

- **Evaluation of the primary documents** (procedures, internal regulations, orders, internal notes, minutes, evaluation guidelines, etc.), in order to understand the significant terms and conditions, both individually and globally, for:

- Assessing their area of applicability, and

- Assessing the accuracy and operating effectiveness of the procedures.

- **Investigation, confirmation and specific detail tests**

Investigation consists of obtaining the information from competent persons within ANI through interviews.

Confirmation consists of obtaining the answers as result of an investigation in order to corroborate it with the information from existent procedures.

The verification was performed on a sample of management actions divided in the following phases:

## **I. Sampling**

Based on the understanding of ANI's working procedures and internal processes, we selected a sample of management actions from each department in order to assess compliance with the legislation in force and ANI's internal procedures/manuals/regulations applicable to each organizational unit. In determining and selecting the sample, we considered each department's specific activity and, where considered necessary, we stratified the population in order to ensure the evaluation of a much representative area of management actions for the respective department.

Please refer to Chapter 7 and Chapter 8 for details regarding the sampling methodology used for each department, agreed in the Draft Report.

## **II. Assessing the implementation of the procedural rules**

We assessed ANI's internal procedures and the compliance with legal framework. The main evaluation criteria were:

- Formalization and compliance with the procedures;
- Use of template documents;
- Documentation of the analysis and evaluation indicators.

## **III. Assessing the achievement of duties**

The main evaluation criteria were:

- Decision management and instrumentation process;
- Compliance with the regulation duties;
- Meeting deadlines.

These points integrate all the regulation elements that must be complied with as part of the procedure. The details regarding the elements to be verified were established based on audit trails and applicable internal manuals, according to the specific situation.

### **3.4. Reporting**

Following the evaluations made, Deloitte submits to ANI management this factual findings report containing the deficiencies identified regarding internal processes and/or procedures applicable at the Agency's level, as detailed in Chapter 7 – IT system evaluation and Chapter 8 – Work methodologies specific to each verified area.



## 4. Status of Action Measures Implementation Corresponding to ANI Strategy for the prevention and sanctioning of conflicts of interest, incompatibilities and unjustified assets (2016 – 2020)

National Integrity Council approved, by Resolution no. 4 of June 14, 2016, the "Strategy for the prevention and sanctioning of conflicts of interest, incompatibilities and unjustified assets (2016-2020)".

For the period January 1 – December 31, 2016 we have followed the status of the measures assumed in the Strategy for the prevention and sanctioning of conflicts of interest, incompatibilities and unjustified assets (2016-2020).

Following the tests performed for determining the degree of measures' implementation status corresponding to ANI Strategy for control and prevention regarding accumulation of assets, conflict of interest and incompatibilities, the following statistics resulted:

<b>Total measures*</b>	<b>Implemented</b>	<b>Partially implemented</b>	<b>Not implemented</b>
<b>56</b>	<b>34</b>	<b>11*</b>	<b>11**</b>

\* 2 measures had deadline for completion June 2016 and 6 had permanent character

\*\* 4 measures had permanent character

Please refer to Appendix 3 for a detailed analysis of the progress related to the measures taken by the new strategy.

## 5. Remediation Status for Deficiencies Identified During the Verifications for the Years 2009, 2010, 2011, 2012, 2013, 2014 and 2015

Following the tests performed in order to assess the remediation status for the deficiencies identified during the verification engagements for the years 2009, 2010, 2011, 2012, 2013 and 2014, which were not assessed as "implemented" as at December 31<sup>st</sup>, 2015, as well as the deficiencies identified during the verifications performed for the year 2015 we prepared the below statistics on remediation status for deficiencies identified as at December 31<sup>st</sup>, 2016:

Directorate/ Department	Total deficiencies	Stage			Implementation of the deficiency was not assessed
		Implemented	Partially implemented	Not implemented	
Risk management process	1	-	1	-	-
Information Technology Department	16	7	6	2	1 <sup>[2]</sup>
Integrity Inspection	7	1	5	0	1 <sup>[1]</sup>
Internal Public Audit Department	1	-	-	1	-
Human Resources Department	3	3	-	-	-
Economic Directorate	2	-	-	1	1 <sup>[2]</sup>
Communication, Public Relations and Strategy Directorate	3	2	1	-	-
Systemic observations	3	3	-	-	-
Archive	1	1	-	-	-
<b>Total</b>	<b>37</b>	<b>17</b>	<b>13</b>	<b>4</b>	<b>3</b>

For details on the deficiencies corrected / partially corrected, please refer to chapters IT System Evaluation and Work Methodologies Specific to Each Verified Area.

<sup>[1]</sup> The implementation of the recommendation could not be assessed for 2016 since in the sample, no elements subject to evaluation were identified.

<sup>[2]</sup> The risk related to the comment was assumed by the Agency's management.

## 6.IT System Evaluation

The IT system procedures consisted of evaluation of applications and processes that sustain their operation, as follows:

1. We evaluated the integrated Information System for the Management of Declarations of Assets and Interests (**SIMIDAI**), its functionalities and the related infrastructure, as well as the process of data recovery and the related risks, in order to assess the way in which the IT system responds to the necessities derived from the specific tasks ANI has to fulfil.
2. We verified the SAP information system intended for the Agency's support activity area and the network infrastructure serving it.

In order to test and evaluate the IT environment, we covered the following phases:

- Understanding ANI's IT system;
- Establish the evaluation criteria and develop the testing plan;
- Perform and document the tests;
- Defining the deficiencies identified.

In order to understand ANI's IT system we attended interviews organized to present and discuss the system functionality with IT Department representatives and with the team that provides the services for designing, administration, analysis and development of the IT system on behalf of the external partner responsible for these services.

This report includes the factual findings from the verifications carried out on ANI's IT system and is based on:

- Information and documentation made available by the employees of the Information Technology Department;
- Analysis of the daily activities performed by the IT Department;
- Visit and check the locations where the hardware serving ANI's software and infrastructure are installed.

### **IT environment and management of IT systems security evaluation**

We verified the manner in which IT systems architecture and structure answer the needs of their operation from the point of view of sufficient internal control implementation possibility.

The IT system verification comprised the following steps:

- Verification of the adequacy and operational effectiveness of IT system general controls;
- Review of the IT system;
- Perform a diagnosis of IT environment security.

Verifications of the IT general controls comprised the identification of the potential risks that might adversely affect the functioning of the application, as well as the evaluation of the control elements designed to mitigate these risks.

We verified the IT system internal control general framework, as well as the IT security standards and procedures implemented by ANI. The activities performed covered the following areas:

- Operating procedures regarding IT applications in use;
- IT environment security;
- Users management;
- Logistic access management;
- Business continuity plan;
- Backup process management for the IT systems;

- Change management policy regarding IT systems.

**During the activities performed part of the SIMIDAI evaluation engagement we paid close attention to the evaluation of the:**

- Integrated IT system functionalities;
- Data recovery process and corresponding risks assessment;
- Critical areas and data that must be recovered;
- Documentation and recovery procedures;
- Roles of the personnel involved in the data recovery process.

The Information Security Management System used by the Agency went through a successful re-certification process in 2016 according to ISO 27001:2013. Governed by the provisions of Standard ISO 27001:2013, ISMS offers better control to the Management on the information flow within the Agency and can provide a unitary management of the matters related to IT security through the active control of internal resources and processes.

For a detailed list of the procedures analyzed during this process, please refer to Appendix 3 List of documents analyzed during the evaluation of the information system.

## **Findings**

Following the evaluation of the operating procedures and based on the methodology applied, the following deficiencies have been identified, which affect the following areas:

- Business continuity;
- Logical security;
- Change management process

In addition, further to the verifications performed, we found that the Agency lacks an entire array of competences necessary to manage the systems/technologies it is currently using. Consequently, continuity in managing and operating the IT systems depends on the services provided by external suppliers. However, in 2016, we found that support in the management and operation of IT systems was not continuous.

Thus, we found that, except for seven deficiencies found in previous years, which were remediated, for the other nine, The Agency is still in the process of implementing corrective measures that fully mitigate the IT environment and IT security management risks identified by Deloitte team.

## 7. Work Methodologies Specific to Each Verified Area

**Following the evaluation of the activity performed during 2016, we noticed a continuation of management's efforts for processes improvement and for the efficiency of the activity performed in order to achieve the planned objectives.**

Following the evaluation of the operating procedures and based upon the methodology mentioned above the deficiencies below have been remedied at the Agency level:

- *The process of updating the ANI website is not transposed in an operating procedure. Analyzing the website [www.integritate.eu](http://www.integritate.eu), we found that:*
  - *section "International cooperation" has not been updated since March 2013;*
  - *section "National Cooperation" was last updated in 2010;*
  - *the latest version of the Organization and Operation Regulation is not available.*

In 2016, the updating of the website was transposed in a procedure communicated to all employees and the website sections regarding international and national cooperation have been updated.

- *The Agency does not have a procedure regulating at global level the registration and route of correspondence in the DMS application.*

Every procedure regarding the internal use of the DMS application by each department has been updated with the steps taken for the documents flow in the application.

Following our verifications and based on the methodology, we have identified the following system observations:

- There were not conducted training sessions for the employees regarding the use of SAP modules.

Following our verifications and based on the methodology, we have identified the following observations regarding the ANI Strategy for the 2016 year:

- The Follow-up indicators are not SMART and, for some cases, are not complete;
- The terms of achievement are not correlated with the measure objective;
- Not all risk are identified;

### 7.1. ANI Management

We have analyzed the responsibilities of ANI President and Vice-President as stated in the ANI Internal Organization Manual approved by ANI President through Order no 7962/04.05.2016 regarding the reorganization of ANI's structure.

We noticed an increase in the communication degree at Agency management level through weekly management meetings that facilitate the process of identification of possible cross-functional issues and best solutions agreed upon.

#### President

The President is fulfilling his responsibilities based on the provisions of the Law 144/2007, the Law no 176/2010 regarding the integrity and dignity in the exercise of public functions for modifying and completing Law no 144/2007 on the establishment, organization and functioning of ANI and to amend and supplement other regulations and the ROF.

Further to the verifications performed and based on the methodology applied, the following deficiency regarding the ANI President in 2016 was remedied:

- There was not developed a management plan and a strategy to prevent and sanction conflicts of interest, incompatibilities and unjustified assets

Efforts of the President's and the agency management direction were also focused this year on the prevention of conflicts of interest, incompatibilities and unjustified assets, which is also evident from the measures planned under the Strategy for the Prevention and Punishment of Conflicts of Interest, Incompatibilities and Unjustified assets (2016 - 2020) ". Most of these are implemented or have made significant progress in 2016 - for details, see Appendix 3. The status of implementation for the action measures related to the ANI Strategy for combating and preventing the accumulation of unjustified assets, conflicts of interest and incompatibilities.

There were no discrepancies identified between the practical activity and the ROF provisions with regard to the President function.

## 7.2. Integrity Inspection

During 2016, the Integrity Inspection's activity was performed in accordance with the provisions of Law no 176/2010 regarding the integrity in the exercise of public functions and dignities, for modifying and completing Law no 144/2007 on the establishment, organization and functioning of ANI, as well as to amend and supplement other regulations, published in the Official Gazette no 621/02.09.2010.

In order to assess the managerial actions taken within the Integrity Inspection, we selected a sample based on the following procedure agreed upon with ANI's management:

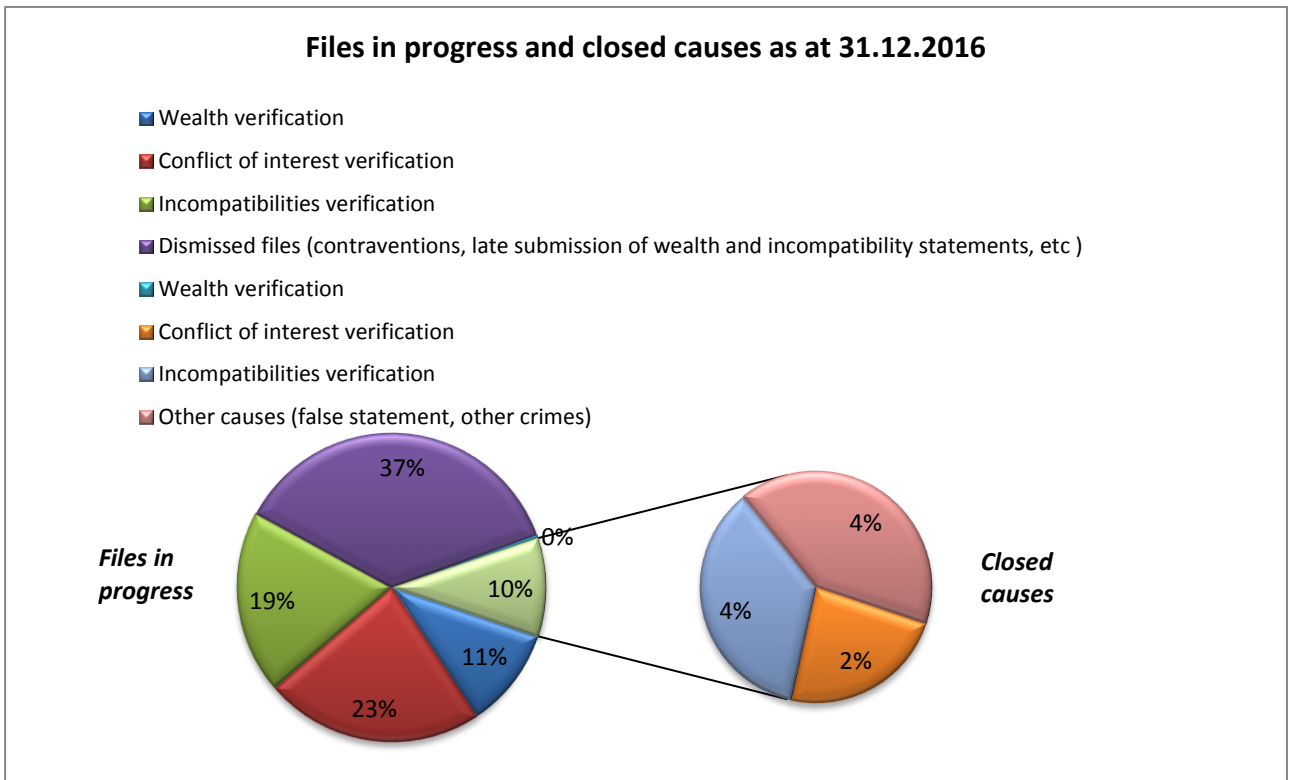
- a) We requested the statistics regarding the number of causes verified during 2016, on the following structure: files settled and files in progress, files dismissed and files re-distributed as at December 31, 2016. In respect of finalized files, we have requested their distribution considering the following sub-categories: causes regarding assets, criminal conflict, administrative conflict, false and other crimes, incompatibility, money laundering, fine. As to the files in progress, we have requested their distribution considering the following sub-categories: unjustified assets, conflict of interest, sanctions, false statements, incompatibility, and possible fines.
- b) Based on the statistics we determined the size of the sample of causes to be analyzed.
- c) We requested the list of causes subject to ANI evaluation procedures during 2016.
- d) Based on the list of causes we randomly selected the sample of files subject to the analysis

Following the procedures above, a sample of 150 cases has been identified (147 unique files), as follows:

<b>Cases closed by ANI during 2016 (January 1 – December 31)<sup>1</sup></b>		<b>Sample size</b>
Verification of assets	21	5
Verification of conflict of interest	168	15
Verification of incompatibilities	258	15
Closed files (potential minor offences, Incompatibility, Conflict of interest, Assets, Fines)	2559	25
<b>Number of cases in progress as at December 31, 2016</b>		
Verification of assets	736	25
Verification of conflict of interest	1606	25
Verification of incompatibilities	1345	25
<b>Other cases</b>		

<sup>1</sup> This data is based on the statistics provided by the Integrity Inspection during the project roll-out.

Fines, other crimes, false statements, corruption, potential minor offences, minor offences	295	15
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The methodology for testing the sample was elaborated based on the understanding and evaluation of operating procedures. We analyzed the content of the operating procedures to identify the activities within the Integrity Inspection and to determine the relevant criteria to stratify the sample for testing, based on department specific activities.

Thus, we verified the documents included in the files according to the steps determined based on the operating procedures regarding the activities of verification the assets, conflict of interest and incompatibilities performed during 2016 by integrity inspectors.

### Aspects regarding the activity of the Integrity Inspection

#### Aspects noted from the analysis of the sample of cases regarding the verification of assets

Based on the sampling method described above we determined 36 cases regarding the verification of assets out of which:

- 16 cases derived from ANI ex officio notification, and
- 19 cases derived from a notification made by individuals or legal entities.

#### Aspects noted from the analysis of the sample of cases regarding the verification of conflicts of interest

Based on the sampling method described above, we determined 46 cases regarding the verification of conflict of interest out of which:

- 18 cases derived from ANI ex officio notification, and
- 27 cases derived from a notification submitted by individuals or legal entities.

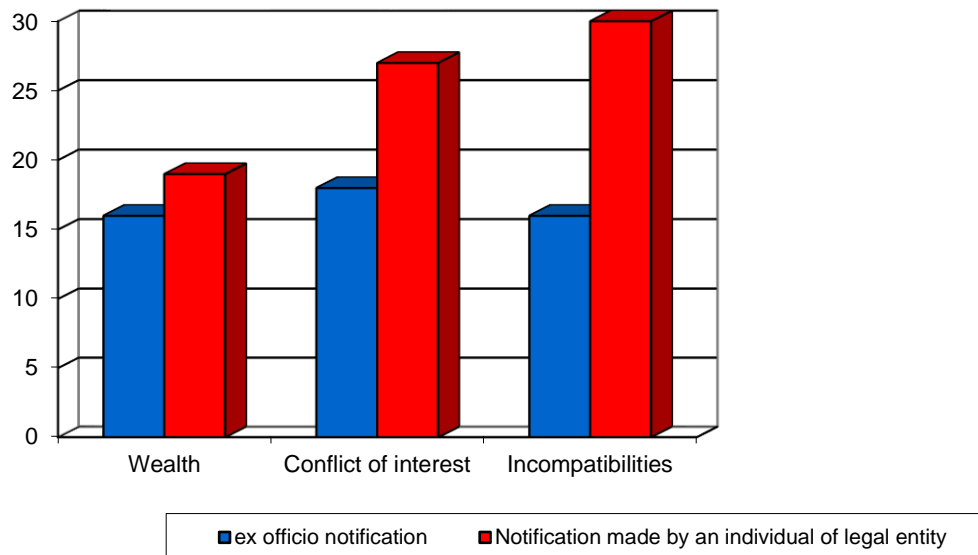
#### Aspects noted from the analysis of the sample of cases regarding the verification of incompatibilities

Based on the sampling method described above we determined 48 cases regarding the verification of incompatibilities out of which:

- 16 cases derived from ANI's ex officio notification, and
- 30 cases derived from a notification made by individuals or legal entities.

## Aspects noted from the analysis of the sample of cases regarding late submission of declarations of assets and interests

Based on the sampling method described above, we determined 24 cases regarding the verification of late submission of declarations of assets and interests.



The activity of the Integrity Inspection is standardized and conducted based on the specific operating procedures elaborated in conformity with the Order no. 400/12 June 2015 for approval of the Code of internal control / management of public entities.

As at the audit date, 92% of the works initiated in 2009 - 2013 had been finalized.

Following the evaluation of the operating procedures and based upon the methodology mentioned above **new deficiencies** have been identified at the level of Integrity Inspection in **2016**:

- The Note regarding the result of consulting the database from the ANI's information system for possible contraventions;
- There were not made minutes of call after communicating with the person assessed or petitioner;
- The proposal to sanction report was not prepared which results in prescribing the offense.

Regarding the deficiencies found during the engagements performed in previous years (2009, 2010, 2011, 2012 and 2014) and not remedied at the time of the verifications conducted for 31.12.2015, and the deficiencies identified further to the verifications conducted for 2015, we followed up on their remediation.

Thus, we found that in 2015, the following deficiencies **were fully remedied**:

- *The 48-hour term between the random distribution report and the Statement of independence and impartiality was failed to meet.*

At the same time, we found that the following deficiencies **have been partially remedied**:

- *Files for which the procedural documents have not been issued for more than 30 days, in terms of preparing the evaluation report (where the information existed) or submitting other information requests.*
- *The address to the petitioner was not sent on starting the assessment procedure within 30 days after receiving the notification and in one case was missed sending;*
- *Failure to submit on time a letter to the ANAF regarding the unpaid minutes ascertaining the minor offense, to register the debt. In two cases, we have identified that the enforcement letter to ANAF was sent 90 days after the Minutes Ascertaining the Minor Offense was drawn up. In one instance, the competent institution registered the debt recorded in the letter.*



- *The reminders were not drawn up and sent to the institutions that failed to respond to ANI's initial letters in the procedure term of 30 days (5 cases).*

Since September 2016, monthly activity reports were generated for each service. In these reports can be seen the files status, the date of the allocation file and generally valid observations.

- *The result of the evaluation was not communicated to all the interested parties according to the procedure.*

The result of the evaluation report was not sent to the petitioner within procedural five days. We did not find cases where the Evaluation report was not sent to the Disciplinary commission and to the assessed person according to the procedure.

Moreover, we found that for the following deficiency we could not assess **the implementation of the recommendation**:

- *Failure to prepare and submit claims to courts for fining the institutions, in accordance to the provisions of art. 27, para. 1 rep. to art. 15 para. 2, Law 176 / 2010, corresponding to the cases in which institutions did not reply to second requests from ANI within 30 days.*

In the sample files selected for testing, we have not identified any cases in which the institutions failed to respond to the reminders (when the reminders were sent) within the legal term.

### **7.3. Internal Public Audit Department**

We analyzed the responsibilities within ANI for the Internal Public Audit Department (hereinafter "CAPI") in accordance with the ROF provisions and the "Methodological Norms regarding the Exertion of the Internal Public Audit Activity within ANI" and the operating procedures that documents the CAPI activity.

The structure activity is standardized and based on specific operating procedures developed in accordance with the OMPF No. 400/June 12, 2015 regarding the Internal/Managerial Control Code for public entities.

The analysis was focused on the compliance of the ROF, internal norms and operating procedures with the applicable laws.

We organized a number of interviews with this department's representative in order to assess the compliance of the practical activity with the procedures' provisions and we performed a number of detailed tests on the following processes within CAPI:

- Preparation of the internal public audit annual plan;
- Preparation of the strategic internal public audit plan;
- Preparation of the quality assurance and improvement program;
- Elaborating the annual report over the internal public audit activity;
- Performing the internal audit engagements;
- Assessment of the individual professional performances;
- The continuous vocational training of internal auditors.

In order to assess the management's actions within the Internal Public Audit Department, we selected from the "Annual public audit plan for 2016" two audit engagements: Follow up on the implementation of the recommendations filed further to the internal audit engagement entitled "Activity of assets control and verification of conflicts of interest / II - The existence of the functionality and efficiency of internal control in business II" and "Public investment activity / CIAP - DE - Performance of the procurement activity". To this effect, we obtained and assessed the documentation applicable for each process in respect to the following criteria: frequency, compliance with the legal provisions, authorization and compliance with the legal terms.

Based on the methodology applied and following the evaluation of the operating procedures, there were no deficiencies identified regarding the activity performed at the level of Internal Public Audit Department.

In respect of the deficiencies identified during engagements conducted in previous years (2009, 2010, 2011, 2012, 2013 and 2014) and not solved at the time of the verifications for 2015, as well as the deficiencies identified during the verifications for 2015, we performed follow-up procedures in order to assess the degree in which these have been addressed / corrected.

The following deficiency **has not been remedied**:

- *Attesting internal auditors*

Because of the assessment performed on the department's activity within the institution, we identified the following **value-added recommendations** at CAPI level for the year 2016:

- Employing at least one auditor in the context of a growing institution. The current number of two auditors proves to be insufficient to cover both current requirements and the need for audit and system performance.

#### **7.4. Legal, Public Relations and Communication General Directorate**

The activity of the Legal, Public Relations and Communication General Directorate is standardized and runs based on the specific operating procedures, drafted in accordance with the provisions of Order no. 400/June 12, 2015 regarding the Internal/Managerial Control Code for public entities

To analyze the compliance of the practical activity of such directorate with the provisions of the ROF, we interviewed the Manager of the Legal, Public Relations and Communication General Directorate, who identified the risks and areas of activity that could be improved in order to increase the activity's efficiency.

#### **Validation and Legal Provisions Department – Disputed Claims Compartment**

We have analyzed the responsibilities of the Legal, Public Relations and Communication General Directorate (hereinafter "DGJRPC") stated in the ROF approved by Order of ANI President no 86/2013, amended by Order of the ANI President no. 7962/04.05.2016, published in the Official Journal no. 429/08.06.2016 regarding the ROF approval. The operational procedures were updated/ modified in 2017.

#### **Contentious activity - representation in cases pending before the courts and investigation of assets Commissions from the Courts of Appeal**

According to the discussion with the manager of DGJRPC, we understood that in 2016, 90% of the court cases were successful.

The directorate consists of nine employees: seven senior legal advisers (including the DGJRPC Director), three senior legal adviser and one assistant legal advisor, as well as two senior civil servants. As practice at the Directorate level, without being yet transposed in operational procedures, ANI is always represented by legal advisors in cases pending before the High Court of Cassation and Justice, Court of Appeal and in cases that may set a precedent the judicial practice. For all other cases, ANI is applying for judgment by default, submitting written observations. This practice is not formalized in a procedure.

The situation of the hearings and uploading to legal counsel during January 2016 - March 2017 is as follows:

- 317 cases at the High Court of Cassation and Justice and the Court of Appeal from Bucharest and from the country were present legal advisers
- 18 cases on monthly average / lawyer representation in court.

According to the operational procedure PO 01/DGJRPC Drafting of documents and National Integrity Agency representation before the courts, defense / greeting shall be made in writing and approved by the Chief DGJRPC. Following our discussions with the DGJRPC Director, we understood that each file is assigned to a responsible, but the hearings may be attended by another legal counsel chosen by the Director in accordance with criteria such as experience in specific case, the complexity of the case, oratorical qualities and so on. This practice is formalized in a procedure.

In 2016 Legal advisers have participated to trainings on "Risk management", Risks and vulnerabilities to corruption in the public sector", "Electronic and classical archiving documents in the context of the last legislative amendments in the archives field", "Public procurement, transparency and lawfulness", "Business Continuity" and "Deontology. Public Integrity".

In respect to the review of possible conflicts of interest, according to the status of civil servants, we were informed that apart from the law, there is no national rules transposing the obligation to refrain for a potential conflict of interest in the allocated cases.

In the audit conducted, we selected a sample of 25 files out of the 1865 files on the dockets of the courts of law and with the Wealth Investigation Commissions attached to the Courts of Appeal in 2016, with a view to test the following procedural matters:

- The manner of recording and assigning the files on the dockets of the courts of law;
- Presentation or preparation, within the specific timelines of procedural documents pertaining to the case's stage in court, by the legal consultant who was assigned the case to represent ANI;
- Compliance with DGJRPC internal procedures.

### **Other activities in responsibility of DGJRPC**

Among the responsibilities of legal advisers are also answers made under Law 544/2001, Ordinance 27/2002, development of viewpoints required by the Department for Relations with the Parliament or / and Ministry of Justice, endorsing the lawfulness of ANI internal documents (Explanatory note for procurement, contract, addendums, committees), participation as members of disciplinary commissions, and dissemination of relevant information on court cases /uniform approach to integrity inspectors.

As regards the deficiencies identified during previous years' engagements (2009, 2010, 2011, 2012, 2013 and 2014), in 2015 there was no observation that was not remedied or new.

Following the evaluation of operational procedures and based on the methodology, for the Legal Service **were identified** the following observations in 2016:

- Number of legal advisors insufficient for the workload;
- There is no transposition into DGJRPC internal rules of the obligation to refrain for a potential conflict of interest in allocated cases.

### **Communication, Public Relations and Strategy Directorate**

The activity of the Directorate is standardized and conducted based on the specific operational conditions elaborated in conformity with the OMFP no. 400/June 12, 2015 regarding the Internal/Managerial Control Code for public entities.

We have analyzed the responsibilities of the Communication, Public Relations and Strategy Directorate (hereinafter "DCRPS") within ANI both for compliance with the ROF and the operating procedures. The focus of the analysis was the conformity of the operating procedures valid during 2016 with ROF provisions and the applicable legislation.

To conclude on the conformity of the practical activity with the procedural provisions, we organized a number of interviews with the DCRPS representative and we assessed through detailed tests the following processes:

- Preparing the answers to the requests received based on the Law no. 544/2001 regarding the free access to public interest information;
- Monitoring the press publications;
- Reporting to Justice Ministry on the implementation status of the measures belonging to ANI for the fulfilment of MCV (Cooperation and Verification Mechanism) Benchmarks;
- Implementing the measures for ANI's Strategy on combating and prevention of unjustified assets, conflict of interest and incompatibility Action Plan implementation.

For the detail tests required, we selected from the "Registry of applications received in 2016" a sample of 25 public information petitions and, in order to test the media monitoring procedure, we selected 15 days from the year in scope.

To this effect, we obtained and assessed the documentation applicable to each process in respect to the frequency, compliance with the legal conditions, authorization, adherence to legal terms, etc.

As regards the deficiencies identified during previous years' engagements (2009, 2010, 2011, 2012, 2013 and 2014) and not solved at the time of the 31.12.2015 verifications, as well as the deficiencies identified during the 2015 verifications, we followed up on their remedy.

Thus, we found that the following deficiencies **have been remedied**:

- *Procedure "Implementation Status of the measures that fall under ANI's responsibility for complying with the MCV conditions" states that the reports regarding the measures status are sent to the Ministry of Justice monthly, but they are sent only at the request of the ministry.*
- *The procedure "Preparation of the responses to the requests filed based on Law 544/2001" is not revised according to the legal provisions in respect of the reaction time to public interest requests.*

Therefore, we found that the following observation was partially remedied:

- replying to requests for information of public interest exceed the maximum term of 30 days from filing the request.

All responses are recorded in the registry and disseminated to the responsible departments and are established internal deadlines for reply, but they do not provide timely submission of responses.

## **7.5. Human Resources Department**

We have analyzed the responsibilities of the Human Resources Department (hereinafter "SRU") within ANI, in accordance with ROF provisions and the operating procedures that document SRU activity. The analysis was focused on the conformity of the valid operating procedures during 2016 with provisions of ROF and applicable legislation.

The activity of this structure is standardized and conducted based on the specific operational conditions elaborated in conformity with the OMFP no. 400/June 12, 2015 regarding the Internal/Managerial Control Code for public entities.

We organized a number of interviews with the HR Department representative to analyze the conformity of the practical activity with the procedural provisions and we assessed through detailed tests the following processes:

- Maintaining the professional file, for both public servants and contractual personnel;
- Organizing contests for employment and promotion within ANI;
- Receiving, recording, tracking the declarations of assets and interests for the personnel of ANI;
- Preparation, certification and the circuit of the timesheets, including inventory of the paid, medical and unpaid leaves etc.;
- Professional training – training plan for 2016 and evaluation of training activities;
- Confirming the permanent positions for debutant personnel during 2016;
- Evaluating the performance of ANI personnel;
- Preparation of the work chart of public functions plan for the year 2016;
- Promotion operating procedure;
- Procedure for terminating work relations;
- Monitoring the compliance of ANI personnel with the conduct norms;
- Disciplinary Commission Activity at ANI level;
- Ethics Consultant Activity.

We mention that for this department we used two methods of testing, based on the nature of the assessed activity:

1. Test an operation from initiation to finalization;
2. Stratify the population and test for each segment an operation from initiation to finalization.

To conduct the tests on the activity of the Human Resources Department, we have requested on a sample basis the documentation for the following selections:

- from "List of contests organized by ANI in 2016", we selected 5 contests;
- from "Contractual personnel of ANI in 2016", we selected 5 professional files;
- from "List of new-comers in 2016 and fully-certified personnel in 2016", we selected 1 personnel file;
- from "List of labor relationships termination", we selected 2 files;
- from "Nominal table of ANI personnel who attended vocational training courses/seminars in 2016", we selected 15 persons who attended such courses/seminars;
- from "Record of public servants", we selected 15 professional files;

To this effect, we obtained and assessed the applicable documentation for each process in respect to the periodicity, compliance with legal conditions, authorization, adherence to legal terms, and errors handling.

Furthermore, following the interviews held with the department's representatives and ANI management, as well as from the analysis performed over HR Department's activity during 2016, we noted the fact that the personnel from this department has a good professional background adequate to the complexity of the tasks to be performed.

Also, we performed an analysis of the responsibilities as per the job descriptions and noted that these are differentiated according to the professional position held and with the provisions stipulated in the national legal framework specific to each specialization, existing distinct responsibilities for the coordinators of the structures, which leads to an improvement of the managerial control function.

Based on the methodology applied and following the evaluation of the operating procedures, the following **value-added recommendations for 2016** were identified regarding the activity performed at the level of **Human Resources Department**:

- OP 24/SRU – Organizing and conducting the recruitment contest/examination for public positions within ANI does not include legal references used in practice;
- Evaluation reports of the selected contractual staff do not include the training courses followed during the evaluation period.

As regards the deficiencies identified during previous years' missions (2009, 2010, 2011, 2012, 2013 and 2014) and not solved at the time of the verifications for 2015, as well as the deficiencies identified during the 2015 verifications, we followed up on their remedy.

Thus, we found that the following deficiencies **have been remedied**:

- *Procedure "Organizing and conducting the contest/exam for recruiting public operating positions within ANI" mentions as stage of the process "Sending to ANI management for approval the request regarding the organization and roll-out of the contest for occupying public execution positions", but in case of one tested contest, this note was not prepared. Nevertheless, we could confirm the President's approval as part of the contest approval request sent to ANFP prior to the beginning of the contest.*
- *Update the reports by comparing the status of the vocational training measures (trainings attended and related costs) with the planning from the beginning of year to identify divergences from the plan, the reasons therefor, as well as the measures to be taken in the upcoming period to achieve the plan.*
- *Procedure on PO22/ S.R.U Monitoring compliance with conduct norms of public servants within ANI fails to mention the responsibility of the Ethics Counsellor of annually planning the number of employees who must attend the sessions of training and awareness of the code of conduct instituted within ANI so that the entire personnel is periodically trained / made aware.*

## Labor Protection Department

We assessed the compliance of the operating procedures valid during 2016 with the ROF provisions and the applicable legislation and we organized an interview with the representative of the Labor Protection Department (hereinafter "CPM") to draw the conclusions about the compliance of the practical activity with the provisions of the operating procedures.

The activity of the Human Resources Department is standardized and conducted based on the specific operational conditions elaborated in conformity with the OMFP no. 400/June 12, 2015 regarding the Internal/Managerial Control Code for public entities.

## 7.6. Economic Directorate

We assessed the compliance of the operating procedures valid during 2016 with the ROF provisions and the applicable legislation and we organized an interview with the Economic Directorate (hereinafter "DE") Director to draw the conclusions about the compliance of the practical activity with the provisions of the operating procedures.

The activity of this structure is standardized and conducted based on the specific operational conditions elaborated in conformity with the OMFP no. 400/June 12, 2015 regarding the Internal/Managerial Control Code for public entities.

### Financial and Accounting Department (SFC) – Accounting Compartment

In order to assess the managerial actions within DE we performed detailed test on the following processes:

- Procedure for establishing the necessary credits for 2016;
- Procedure for drafting the expenses budget;
- Implementing the investment project for 2016;
- Expense hiring, liquidation, authorization and payment processes
- Cash register;
- Internal preventive financial control;
- Monitoring the expenses of personnel;
- Asset count.

For the detail and control tests, we selected June and December 2016 from the "Cash register".

To this effect, we obtained and assessed the applicable documentation for each process in respect to the periodicity, compliance with the legal conditions, authorization, adherence to legal terms and errors management.

In respect of the deficiencies identified during previous years' engagements (2009, 2010, 2011, 2012, 2013 and 2014) and not solved at the time of the verifications for 2015, as well as the deficiencies identified during the 2015 verifications, we performed follow-up procedures in order to assess the degree in which these have been addressed/ corrected.

The following deficiency **has not been remedied**:

- *Improper use of the reported efficiency and result indicators' names.*

The name of the efficiency indicators and results can only be changed when drafting the budget project. It was taken into account when drafting the budget for 2017.

The following deficiency **has not been remedied but the potential impact was assumed by the verified entity**:

- *SAP system does not allow printing of "Expenses engaging" document in a format that allows the inclusion of the Agency's identification elements*

## Investment and Public Procurement Department – CIAP

We have analyzed the responsibilities of the Investment and Public Procurement Department (hereinafter "CIAP") in accordance with ROF provisions and operating procedures that document the activity of CIAP. The analysis was focused on the compliance of the operating procedures valid during 2016 with ROF provisions and the applicable legislation.

To conclude on the conformity of the practical activity with the procedural provisions we organized a number of interviews with CIAP representative and we assessed through detailed tests the public procurement process.

We have obtained the list of public procurements started in 2016. Following the analysis of this status, we noted the fact that during 2016 there were purchased goods, services and assignments through the processes of call for tenders, open tender, direct purchase and subsequent contracts.

To this effect, we determined the sample size for the detailed tests (25 purchases), relating to the total number of public acquisitions purchased in 2016 through the process of direct acquisition, 2 purchases made through tendering procedure also 2 purchases made through open tender. In addition, we stratified the population so that the sample would include different types of goods and services and works purchased through direct acquisition.

The evaluation of the purchases included in the sample aimed the conformity of the activities performed with the operating procedure for direct acquisition, valid during 2016.

We have not identified any cases of inconsistency of the acquisition process with the procedures in force provisions.

### 7.7. Archiving Department

In August 2016, was assigned a responsible person through the order no. 13011/01.08.2016 regarding the appointing the ANI responsible person for archive issues. The assigned person holds a participation certificate no. 002/28.09.2016 at the Seminar "Electronic archiving and classic storage of documents in the context of last legislative changes in Archives" which was held from 27 to 28 September 2016. At this seminar attended at least one person from each Directorate/Department and Office within the institution, person who was later appointed responsible for archiving / filing documents according to the legislation and the archive nomenclature.

Currently, the document archiving is made in accordance with the working methodology for physical archiving and electronic document conversion having as base the procedures of the company contracted for archiving. Following the last contract signed in 2016, will be archived both records of inspections and documents for other departments. In 2016 were archived all assets and interests statements received and completed files / classes from Integrity Inspection.

Through the address number nr.18424 / 17.11.2016 National Integrity Agency has submitted to the Romanian National Archives, National Central Historical Archives Service, Administrative and Cultural Office Archives the Archives Nomenclature project. Archive nomenclature was approved through address no. 19638 / 13.12.2016.

Based on the methodology applied and following the evaluation of the operating procedures, the following **observations** were identified for year 2016:

- *Files belonging to the auxiliary activities were not physically or electronically archived;*

In respect of the deficiencies identified during previous years' engagements (2009, 2010, 2011, 2012, 2013 and 2014) and not solved at the time of the verifications for 2015, as well as the deficiencies identified during the 2015 verifications, we performed follow-up procedures in order to assess the degree in which these have been addressed / corrected.

Thus, we noticed that corrective measures have been **implemented** in respect of the following deficiency:

- *At ANI's level, the archiving nomenclature was not implemented.*

## 7.8. Risk management process at ANI's level

To ensure compliance with Standard 15 of the SGG Order no. 400 / 2015, at ANI level, two permanent Commission have been established with roles and responsibilities on the management of risks identified as being associated with activities performed at the level of every functional structure within the institution. Within the agency operates the SCM Monitoring Committee established by Order nr.20060 / 20.12.2016 and risk management team, established by Order no. 20058 / 20.12.2016.

In addition, ANI's procedures manual contains the system procedure regarding "Risk Management" for a unitary implementation of the principles to identify and control risks within all ANI functional structures.

In addition, we noted that, at ANI's level, a System Procedure named "Risk Management" containing provisions regarding:

- Implementation and development of implementation for Standard 8 of OMFP 400/2015 regarding the Internal/Managerial Control Code for public entities;
- Risk management process at ANI's level;
- Setting and implementation of control actions/measures/devices.

In assessing the adequacy and effectiveness of the risk management process at ANI's level, we assessed the following aspects through the actions taken during 2016:

- Unique Risks Registry prepared and revised at ANI level;
- The process of risks identification, reporting, assessment and monitoring;
- Existence of procedures / internal norms to formalize the risk management process;
- Quarterly reports submitted to the Central Unit for Harmonization of Financial and Control Management Systems (hereinafter "UCASMFC) regarding the implementation status of internal control management system.

In respect of the deficiencies identified during previous years' engagements (2009, 2010, 2011, 2012, 2013 and 2014) and not solved at the time of the verifications for 2015, as well as the deficiencies identified during the 2015 verifications, we performed follow-up procedures in order to assess the degree in which these have been addressed / corrected.

The following deficiency was **partially remedied**:

- *Standardization of the approach regarding risk treatment and correlation of activities performed in practice with the provisions of system procedure.*

Some of ANI's personnel (members of the Managerial Control System commission) have attended risk management trainings. The absence of such trainings for every employee of the agency affects directly the quality of the risk identification and assessment process, as the risks currently identified are minimal and do not cover all the aspects of each structure processes.





## 8. Use of the present report

This report is intended for the use of the management of ANI, for its communication to the National Council for Integrity and publication on ANI website. As such, the findings/deficiencies included in this report should not constitute a basis for any other type of action.

Our findings, as presented in this Report, are based upon the documentation made available to us by ANI.

We cannot exclude that we may have arrived to additional or different findings had further information and documentation been provided to us. We have relied upon the contents of such documentation and information provided to us, and we have assumed the documentation and information to be accurate and complete.

Should further information and/or documentation and/or data exist, which was not divulged or provided to us, or if any of the verbal statements or explanation are incorrect or misleading, any findings, interpretations or opinions contained herein may be incomplete and may have generated different results, which would require further or amended procedures outside of the applicability area of the present engagement.

The verification procedures performed by us were agreed between Deloitte and ANI. Deloitte provides no assurance regarding the sufficiency of these verification procedures performed for the purposes of ANI.

Had we performed additional specified procedures other matters might have come to our attention, which would have been reported to ANI.

This Report must not be construed as expressing opinions on matters of law, which are outside our expertise.

Deloitte has no responsibility to update the Report for events and circumstances occurring after December 31, 2016.

This Report or its contents should not be used, reproduced or circulated to any other party or for any other purpose than that for which it was intended, in whole or in part, without our prior written consent, except those provisions stipulated in the first paragraph. Furthermore, we do not accept responsibility to any third parties for any breach of this obligation or for any opinion expressed, or information included within this Report. The information within this Report is provided on the basis that the recipient will not rely upon it as the sole basis for any action or decision. This Report relates only to the items specified above and does not extend to any other financial information.

Some of the information included in this Report has been provided by external sources. We were unable to test the accuracy and completeness of the information obtained from these external sources in all the cases. Therefore, we take no responsibility and we do not provide any assurance upon the accuracy and completeness of the information provided by these external sources.

This report refers only to the audit of ANI's management quality for the year 2016 conducted in accordance with the provisions of standard ISRS 4400, as defined in the specifications. Thus, we do not offer assurance in respect of ANI's management quality.

## APPENDIX 1 List of interviewed persons

Activity	ANI representative	Current position / Department
Interview on ANI management	<b>Bogdan STAN</b>	President
Interview on ANI management	<b>Silviu POPA</b>	General Secretary
Interview on DGJRPC activity	<b>Ioana LAZĂR</b>	General Director – Legal, Public Relations and Communications General Directorate
Interview on DCRPS activity	<b>Mirabela MOISE</b>	Principal Counselor – Communications, Public Relations and Strategy Directorate
Interview on STI activity	<b>Cristinela GROSU</b>	Head of Department – Information Technology Directorate
Interview on SRU activity	<b>Veronica GHIBA</b>	Head of Department – Human Resources Department
Interview on Labor Protection Department activity	<b>Venera Butnărescu</b>	IA Referent
Interview on CAPI activity	<b>Anne Marie ONCESCU</b>	Senior auditor – Internal Public Audit Department
Interview on CIAP and DE activity	<b>Greta CONSTANTINESCU</b>	Director – Economic Directorate
Interview on CIAP activity	<b>Viorica Țuțui</b>	Expert - CIAP
Interview on Integrity Inspection activity	<b>Elena GALAN</b>	General Director – Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Mihai POPESCU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Romică DINICĂ</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Puița BECUȚ</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Alina Dabija (TÂRNĂ)</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Anca TOMULESCU</b>	Head of Department, Integrity Inspection

## APPENDIX 1 List of interviewed persons (continued)

Activity	ANI representative	Current position / Department
Interview to clear up some aspects regarding the integrity inspection files	<b>Ana-Luiza DOMNIȚEANU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Daniela MINCU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Marius UNCI</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Florentina LUȚAS</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Delia BĂLTĂREȚU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Mirela ȚURLACU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Ioana – Alina GULEȘ – STANCIU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Șerban Ionuț CARDAȘ</b>	Head of Department, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Daniela MITUȚOIU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Andra Lavinia CÎMPEANU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Dan MANȚU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Nicoleta Elena CREȚU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Maria CREȚU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Ionuț PÎNDARU</b>	Integrity Inspector, Integrity Inspection

## APPENDIX 1 List of interviewed persons (continued)

Activity	ANI representative	Current position / Department
Interview to clear up some aspects regarding the integrity inspection files	<b>Anamaria ANGHELESCU</b>	Head of Department, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Andrada BOCA</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Alexandru POPA</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Tudor MITROIU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Florin Ionel MOISE</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Ana VÎNTURUȘ</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Catalin GULEȘ STANCIU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Roxana GRUBER</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Mădălina VĂRDARU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Vasilica BRATU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Lucia Eliza GULIMAN</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Roxana DINULESCU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Eduard VASILESCU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Roxana VIȘENESCU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Mihai FENTZEL</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Constanța BIZADEA</b>	Integrity Inspector, Integrity Inspection

Interview to clear up some aspects regarding the integrity inspection files	<b>Andrei CHIOCHIU</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Marinela IONIȚĂ</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Mihaela CLAPĂ</b>	Integrity Inspector, Integrity Inspection
Interview to clear up some aspects regarding the integrity inspection files	<b>Daniela MINCU</b>	Integrity Inspector, Integrity Inspection
Interview regarding the archiving activity	<b>Cristinela GROSU</b> <b>Greta CONSTANTINESCU</b> <b>Ioana ANTONESCU</b>	Head of Office – IT department Manager – Finance Department Archivist- Registry department

## APPENDIX 2 List of procedures analyzed

<b>Operating procedure</b>
PO 01/II – Activity of checking the declarations of assets and conflict of interest received from ANI Registry
PO 02/II – Apply contravention sanctions for: I. Not submitting DA/DI within the timeframe stipulated under the law; II. Not submitting amended DA/DI within the timeframe stipulated under the law; III. Not stating, in the declaration of assets, the amount of income obtained or not stating them with cross reference to other documents; IV. Not fulfilling legal obligations by the persons responsible with the implementation of provisions regarding the declarations of assets and conflict of interest; VI. Not applying disciplinary sanctions or not contesting suspension of public function, as appropriate, when the evaluation report remains final
PO 03/II – Activity of evaluation of declarations of assets, of data and information regarding existing assets, as well as of patrimonial changes appeared existing in the exercise of public functions or dignity
PO 04/II – Evaluation of compliance with legal provisions regarding conflict of interest in the exercise of public functions or dignity
PO 05/II – Checking compliance with legal provisions regarding incompatibility regime in the exercise of mandates or public functions or dignity
PO 06/II – How to fill in the declarations of assets and interests
PO 07/II – Redistribution of the works assigned to the integrity inspectors, in conformity with article 9 paragraph 2 of Law no 176/01.09.2010
PO 08/II – Execution of extrajudicial expertise I. Execution of extrajudicial expertise with the agreement of the person whose assets are subject to evaluation; II. Execution of extrajudicial expertise in case the person whose assets are subject to evaluation does not agree with the execution of the expertise
PO 09/II – Taking action in ascertain absolute nullity of legal or administrative acts concluded infringing legal obligations regarding conflict of interest by the person subject to evaluation
PO 10/II – The documents flow between Integrity Inspection and Legal, Public Relations and Communication Directorate
PO 11/II – Random distribution of causes in conformity with article 9 paragraph 1 of Law no 176/2010
PO 12/II – Receiving, Collecting, Centralizing and Processing the Declarations of assets and Interests by the Integrity Inspectors of the General Registry Office and Integrity Inspection
PO 13/II – Settlement of claims
<b>Human Resources Department</b>
PO 01/SRU – Evaluation of public servants individual professional performance
PO 02/SRU – Appointment in a vacant public position
PO 03/SRU – Completion of the registry of contractual employees
PO 04/SRU – Organization of the contest / examination for occupying the position of integrity inspector

## APPENDIX 2 List of procedures analyzed (continued)

<b>Operating procedure</b>
<b>Human Resources Department</b>
PO 05/SRU – Organization of the contest for occupying a contractual position within ANI
PO 06/SRU – Confirmation on the job of entry-level employee
PO 07/SRU – Scheduling and attribution of vacations for ANI personnel
PO 08/SRU – Delegation of work tasks within ANI
PO 09/SRU – Drafting, approval and submission of collective timesheets
PO 10/SRU – Communication of ANI Internal Regulation to employees
PO 11/SRU – Promotion of public servants
PO 12/SRU – Drafting the Annual Plan of Professional Training and of the plan of measures for professional development of ANI personnel
PO 13/SRU – Registering and recording of medical certificates within ANI
PO 14/SRU – Drafting and approval of ANI functions list
PO 15/SRU – Drafting and maintenance of public servant professional file
PO 16/SRU – Fulfilling the legal obligations regarding declarations of assets and conflict of interest by ANI personnel
PO 17/SRU – Drafting and updating job descriptions
PO 18/SRU – Approval of overtime for ANI personnel
PO 19/SRU – Termination of workplace relations
PO 20/SRU – Evaluation of contractual personnel’s professional performances
PO 21/SRU – Plan for occupancy of public functions
PO 22/SRU – Monitoring compliance with conduct norms of public servants within ANI
PO 23/SRU – Granting salaries to ANI personnel
PO 24/SRU – Organizing and conducting the contest/exam for recruiting public operating positions within ANI
PO 25/SRU – Redistribution of public servants, organizing and conducting professional testing within ANI
PO 26/SRU – Preparation, update and submission of public servants evidence register
PO 27/SRU – Preparation, approval and submission of quarterly reports on professional development of public servants within ANI and of the yearly report on Agency’s personnel professional development
PO 28/SRU – Preparation and modification of ANI’s ROF
PO 29/SRU – Organizing and conducting the contest / exam for recruiting/promotion for public management functions within ANI
PO 30/SRU – Preparation and management of personnel file

## APPENDIX 2 List of procedures analyzed (continued)

<b>Operating procedure</b>
<b>Labor Protection Department</b>
PO 01/CPM – Training on occupational security and health
PO 02/CPM – Introductory and general training on occupational security and health
PO 03/CPM – On the job training on occupational security and health
PO 04/CPM – Periodic training on occupational security and health
PO 05/CPM – Collective training
PO 06/CPM – Drawing up own instructions on occupational security and health
PO 07/CPM – Research, registration, declaration and record-keeping of labour accidents and professional illnesses
PO 08/CPM – Risk assessment
PO 09/CPM – Drawing up the prevention and protection plan
PO 10/CPM – Preparing the list of employees' protection equipment
PO 11/CPM – Supervision of workers' health
PO 12/CPM – Maternity protection at the workplace
PO 13/CPM – Organization and operation of the health and safety committee
<b>President's/ Vice president's office</b>
PO 01/CP – Submission for approval of documents and internal and external correspondence
PO 02/CP – Issuing orders
PO 03/CP – Making appointments to the president
PO 04/CP – Keeping records of the working hours
<b>Commission for monitoring, coordination and methodological guidance of the ANI managerial control system development</b>
PS 01/SCM – Risk management
PS 02/SCM – Functioning of the SCM monitoring commission and risk management team organized within ANI
PS 03/SCM – Drafting of the operational procedures specific to the ANI activities
PS 04/SCM - Preparation of Scorecard – basis of discussions scheduled at the Cabinet of the President and Vice-President
PS05/SCM - Drafting quarterly / annual report for SGG regarding the implementation and development of control systems management within ANI



## APPENDIX 2 List of procedures analyzed (continued)

<b>Operating procedure</b>
<b><i>Internal Public Audit Department</i></b>
PO 01/CAPI – Preparation of the Internal Public Audit Department activity
PO 02/CAPI – Preparation of the Annual Report of Internal Public Audit Activity
PO 03/CAPI – Human resources management within CAPI
PO 04/CAPI – Performance of internal public audit missions based on the Internal public audit annual plan
PO 05/CAPI – Prepare internal public audit engagements
PO 05.1/CAPI – Order of work preparation and circulation
PO 05.2/CAPI – Auditor’s independence statement
PO 05.3/CAPI – Notification of audited structure on the start of audit engagement
PO 05.4/CAPI – Opening/Kick-off meeting for audit engagements
PO 06.1/CAPI – Conducting of the "intervention of auditors on site" stage
PO 06.2/CAPI – Preparation and circulation of Closing meeting minute
PO 07/CAPI – Audit engagement report preparation
PO 08/CAPI – Follow up on the implementation of recommendations from previous engagements reports
PO 09/CAPI – Supervision of audit engagements
PO 10/CAPI – Personnel evaluation
PO 11/CAPI – Internal auditors national attestation process
PO 12/CAPI – Performing consulting engagements
PO 13/CAPI – Preparation and update of “Applicable legislation on auditable domains” Registry
PO 14/CAPI – Designing and monitoring the Program for providing and improving the quality of the internal public audit
PO 15/CAPI – Designing and revising the Methodological rules on the exercise of the internal public audit at ANI
PO 16/CAPI – Conduct of the ad-hoc engagement
PO 17/ CAPI – Conduct of the internal audit performance mission

## APPENDIX 2 List of procedures analyzed (continued)

<b>Operating procedure</b>
<b><i>Legal, Public Relations and Communication General Directorate</i></b>
PO 01/ DJCRP – Drafting the documents and ANI representation before courts
PO 02/ DJCRP – Procedure regarding the approval of ANI contracts
PO 03/ DJCRP – Procedure regarding the approval of ANI internal documents
PO 04/ DJCRP – Procedure ways and conditions to keep, record and archive DJCRP documents (started/prepared by)
PO 05/ DJCRP – Monitoring, analysis and dissemination of applicable jurisprudence, specific to ANI activity
<b><i>Communication, Public Relations and Strategy Directorate</i></b>
PO 01/ DCRPS – Drafting the answers to the requests
PO 02/ DCRPS – Drafting media materials
PO 03/ DCRPS – Performance of media monitoring activities
PO 04/ DCRPS – Organization of protocol events
PO 05/ DCRPS – Organization of domestic and international travels
PO 06/ DCRPS – Follow-up on the fulfillment of the ANI allocated measures to achieve the MCV conditions
PO 07/ DCRPS – Drafting ANI communication strategy
PO 08/ DCRPS – Communication of public interest informations to individuals, legal entities or mass-media that are presenting at ANI
<b><i>Economic Directorate</i></b>
PO 01/F/DGE - Plan, develop and approve the annual program of public investment draft
PO 01/C/DGE – Accounting records of material collaterals constituted under the law
PO 01/DGE - Preventive financial control activity
PO 02/F/DGE – Establishing the necessary monthly credits to request the opening of budgetary credits
PO 01/C/DE – Accounting records of fixed assets and depreciation
PO 02/F/DE – Justification of monthly credit needs in order to request the opening of budgetary credits
PO 02/C/DGE - Accounting records of salary expenses on the budgetary classification structure
PO 03/F/DGE – Processing the credit transfers within approved expenses budget
PO 03C/DGE - Accounting records of bank payments of the expenses for goods and services and capital expenditure related to the budgetary exercise, on the budgetary classification structure
PO 04/F/DGE - Start of investments financing approved through the expenses budget of the Agency

## APPENDIX 2 List of procedures analyzed (continued)

<b>Operating procedure</b>
<b><i>Economic Directorate</i></b>
PO 04.1/C/DGE - Keeping the record of the expenses related to international travel, on the budgetary classification structure
PO 04.2/C/DGE - Keeping the record of the documents related to the cash collections and payments in "lei"
PO 05/F/DGE - Activity of preparation and justification of the budgeted expenses of the Agency
PO 05/C/DGE - The monthly, quarterly and annually activity of editing the general ledger, account details and synthetically and analytical balance sheet, using SAP system
PO 06/ANI - Inventory of assets and liabilities
PO 6.1/F/DGE - Activity of expenses commitment
PO 06.1/C/DGE - Stocks record of consumables in commercial management program
PO 6.2/F/DGE - Activity of expenses clearance
PO 06.2/C/DGE - Evidence of tangible and intangible assets in course of execution
PO 06.3/F/DE - Activity of expenses authorization
PO 06.4/F/DE - Activity of expenses payment
PO 06.4/C/DGE - Preparing the inventory numbers registry
PO 06/C/DE - Accounting records of salary expenses on the budgetary classification structure
PO 06.5/C/DGE - Decommissioning and discarding of the fixed assets and inventory items in use
PO 6.5/F/DGE - Organization, recording and reporting of budgetary appropriations, legal appropriations, approved commitment appropriations and employed commitment appropriations
PO 07/C/DGE - Preparing, signing, submitting, composition, and instructions on filling in ANI quarterly and annual financial statements
PO 08/C/DGE - Preparing the inventory register
PO 8.1/F/DGE - Performing the Cash operation in "lei"
PO 8.2/F/DGE - Performing the Cash operations in foreign currency
PO 9.1/F/DGE - Filling in and verification of the "lei" Cash Registry
PO 9.2/F/DGE - Filling in and verification of the foreign currency Cash Registry
PO 10/F/DGE - Preparing the payment orders for the payments performed from the expenses and availabilities accounts, opened by the Agency at the State Treasury, based upon the payment authorizations approved by the credit release authority
PO 11/F/DGE - Preparing the payment sheets and submitting them to the State Treasury
PO 12/F/DGE - Obtaining the account statements from the State Treasury and Credit Europe Bank
PO 13.1/F/DGE - - Preparing the Situation regarding monitoring of personnel expenses in the month ... year ...
PO 13.2/F/DGE - Quarterly monitoring of the personnel expenses
PO 14.1/F/DGE - Preparation and submission of the Declaration regarding the payment obligations to the state budget, code 14.13.01.99/bs
PO 14.2/F/DGE - Preparation and submission of the Statement on payment obligations of the social contributions, income tax and individual evidence of insured persons
PO 15/F/DGE - Checking the domestic and international travel expenses

<b>Operating procedure</b>
<b><i>Investment and Public Procurement Department</i></b>
PO 01/ BAPIGP – Procurement through the “request for offer” procedure of goods / services / works
PO 02/ BAPIGP – Procurement through direct acquisition of goods / services / works
PO 03/ BAPIGP – Elaboration and update of the Public Acquisition Annual Program
PO 04/ BAPIGP – Procurement through “open bidding” procedure of goods / services / works
PO 05/ BAPIGP – Preparation of tender documentation within the public acquisition procedures
PO 06/ BAPIGP – Administration of the public procurement contract
PO 07/ BAPIGP – Monitoring the establishment and return of the good performance bond for public acquisition contracts
PO 08/BAPIGP – Preparing the reception note
PO 09/BAPIGP – Preparing the storage sheet
PO 10/BAPIGP – Preparing the consumption ticket
PO 11/BAPIGP – Evidence and keeping the original version of the public acquisition contracts
<b><i>Information Technology</i></b>
POL – 01 IT Security Management System Policy
POL – 02 Computer security policy
POL – 03 Security regulations for users of information resources
POL – 05 Physical Security Policy
PO – 01 Users account management
PO – 02 IT incidents management
PO – 03 Configuration management
PO – 04 Change Management
PO – 05 Patch Management
PO – 06 Monitoring of IT services provided by third parties

**APPENDIX 3 Implementation Status of action measures related to ANI Strategy for combating and preventing undue accumulation of assets, conflicts of interest and states of incompatibility**

**Objective no. 1: Boosting prevention and awareness activities**

**1.1 Preventing the conflict of interest in public procurement**

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
1.1.1.	Implementation and full functioning of the computer system PREVENT after publication in the Official Journal;	Permanent action and annually evaluated	No. of procurement procedures analyzed  No. of integrity warnings issued  No. of conflicts of interest prevented	Technical malfunctions  The delay of the regulation's approval	ANI	<b>Not implemented</b>  To operationalize PREVENT IT system, it was set up a working group on the National Integrity Agency level. Thus, procedures have been analyzed in test environment, completed by issuing warnings, databases were interrogated and the identified deficiencies have been communicated to the authorities, in order to remedy them.  In addition, meetings were held with the Public Procurement Agency and the Agency of Romania Digital Agenda to establish the implementation steps for the integrity form, until the entry into force of Law no. 184/2016, in June 2017.
1.1.2.	Entry of the law on preventing conflict of interest in public procurement and monitoring on how it applies;	July 2016	The law published in MOF  Statistical data resulting from PREVENT	Delayed approval of the legislative text  Submission of amendments which are not consistent with the law	The Romanian Parliament	<b>Partially implemented</b>  Law no. 184/2016 on the establishment of a mechanism to prevent conflicts of interest in the award procedure of public procurement contracts was adopted by the Romanian Parliament and published in the Official Gazette no. 831 of October 20, 2016.  Monitoring on how the law applies it will be made after the operability of the PREVENT IT system.

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
1.1.3.	Publication of statistical data in open format on the results of the conflict of interest prevention mechanism in public procurement financed from national and European funds.	Permanent action and annually evaluated	Statistical data published on the website of ANI	N/a	ANI	<p><b>Not implemented</b></p> <p>The statistics on the results of the mechanism to prevent conflicts of interest in public procurement financed from national and European funds will be published as open after the fully operationalization of the PREVENT IT system.</p>

## 1.2 Preventing corruption and integrity incidents among the members of Parliament

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
1.2.1.	Working with Parliament to improve the consulting system regarding the integrity, by providing regular specialized training and clarifying implications for the members of Parliament on the conflicts of interest, incompatibilities and enforcement in practice, in line with the recommendations of GRECO	May 2017	<p>Joint Working Group</p> <p>Performed study</p> <p>Designated ANI expert</p> <p>Formalized consulting system</p> <p>Number of joint meetings with the decisive</p>	Lack of human and technical resources availability of	<p>ANI</p> <p>The Romanian Parliament</p>	<p><b>Partially implemented</b></p> <p>An integrity inspector within the Agency was appointed as responsible for clarifying certain aspects of how to complete the statements of assets and interests (DAI), and the deadlines for submission, due to the relationship developed with responsible persons for DAI implementation from the two houses of parliament.</p> <p>With the Parliamentary elections in 2016, was created a separate section on the ANI website, in which were published guidelines on incompatibilities and conflicts of interest / filing assets and interests statement, electronic forms of assets and interests statement, legislation applied by reference to recurrent cases of incompatibility and conflicts of interest applicable to parliamentarians.</p> <p>Moreover, there was created a special telephone line in order to provide specialized assistance for election candidates, on the legal regime of the assets and interests statements, incompatibilities and conflicts of</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
			factors from both entities			<p>interest. In addition, it was made available a unique e-mail address, where people and entities have submitted notifications, requests views on the legal regime of incompatibilities and conflicts of interest, or on completing declarations of assets and interests.</p> <p>However, the National Integrity Agency summarized the most common cases of incompatibilities and conflicts of interest applicable to parliamentarians, which are published on the website of the Agency.</p>
1.2.2.	Identify ways to accelerate and enforce judgments relating to incompatibilities for the members of Parliament	May 2017	Ways to implement identified formalized judgments to the and	N/a	ANI  The Romanian Parliament	<p><b>Implemented</b></p> <p>Operational procedures have been developed to ensure the celerity of the communication with the integrity inspectors regarding the courts solutions, in order to implement the legal measures ordered to be taken following the final decision on the evaluation reports, procedures approved in March 2017.</p> <p>However, in view of parliamentary elections in 2016, the National Integrity Agency took steps on compliance with court decisions, meaning that communicated both to Permanent Electoral Authority and to Central Electoral Commission during the electoral process and to the Parliament in the context of the validation of mandates the list of persons under ban to hold a position or public office for a period of three years.</p> <p>Following completion of the electoral process and hence the validation of parliamentary seats, ANI has continued to take steps on the Enforcement of Court Decisions in that asked Parliament the enforcement of rules for the persons who, although they were under the ban to hold public function or dignity for a period of three years, have been validated for another term or legislature from 2016 to 2020.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
1.3.1.	Strengthen the cooperation with CSM in order to provide assistance in relation to the Code of Ethics on the recommendations of GRECO Report	May 2017	Joint organized events Designated ANI expert Formalized consulting system	Lack of human and technical resources availability of	ANI CSM	<b>Not implemented</b> ANI management initiated discussions with representatives of the Superior Council of Magistracy for the completion of a form of collaboration, addressing Code of Ethics, on recommendations of the GRECO report.
1.3.2.	Increasing training efforts and awareness of integrity	May 2017	Joint organized events	Lack of human and technical resources availability of	ANI CSM	<b>Implemented</b> Agency representatives participated during 12 to 13 May, 10 June and 12 to 13 September at the regional meetings on "Investigation of corruption crimes and the conflict of interest crime", held by the Public Ministry - Prosecutor's Office attached to the High Court Cassation and Justice, aiming to improve the efficiency of criminal prosecution in relation to criminal offenses of corruption and conflict of interest crime. National Integrity Agency Management held a series of meetings with representatives of the National Institute of Magistracy, after which has been established the start of continuous training courses for INM students, justice auditors and magistrates, in order to increase integrity in public office. The National Integrity Agency will appoint experts for these courses and INM will facilitate these courses by providing classrooms and support.



Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
1.4.1.	Improving the effectiveness of reporting and submission of DA / DI	December 2016	<p>The number of notifications sent to prefectures</p> <p>Contact Person designated within ANI</p> <p>Number of meetings held at local / central level</p>	Lack of responsiveness of decision makers at the local / central level	<p>ANI</p> <p>Prefectures</p> <p>Parliament</p> <p>AMR</p> <p>AOR</p> <p>ACR</p>	<p><b>Implemented</b></p> <p>In the context of local elections in 2016, with the Interior Ministry support, A.N.I. held a videoconference with all the prefects from territory, which aimed optimizing the completion and submission of assets and interests statements, and disseminate useful information on improving the flow of assets and interests statements transmission to A.N.I.</p> <p>However, to clarify the difficulties in completing the statements and improve the system of statements reporting and submission, the Agency sent to all counties prefects Electronic forms of assets and interests statements, Guide to completing the assets and interests statements, Guidance on incompatibilities and conflicts of interest.</p> <p>In addition, with the Permanent Electoral Authority and the Central Electoral Bureau support, A.N.I. disseminated information to all entities involved in the electoral process and political parties legally established and transmitted to the authorities mentioned above, both guides on incompatibilities and conflicts of interest / filing assets and interests statements, DAI electronic forms and the list of persons under interdiction to hold a function or public office for a period of 3 years.</p> <p>Were nominated integrity inspectors that responded to a special telephone line offering specialized assistance to candidates, about the legal regime of the assets and interests statements, incompatibilities and conflicts of interest. In addition, it was made available a unique e-mail address where people and entities have submitted complaints, requests for views.</p>
1.4.2.	Updating guidelines on incompatibilities and conflicts of	June 2016	Updated guide	N/a	<p>ANI</p> <p>NGOs</p>	<p><b>Implemented</b></p> <p>National Integrity Agency updated the Guide for completing assets and interests statements, as well as</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
	interest / DA / DI completion					the guide on incompatibilities and conflicts of interest, available on the Agency website.
1.4.3.	Study regarding the repetitive cases in matter of conflicts of interest and incompatibilities with reference to several categories of public offices	June 2016	Drafted study	N/a	ANI NGOs	<b>Implemented</b> Based on expertise gained in integrity incidents, in the context of local and parliamentary elections in 2016, the National Integrity Agency synthesized the most frequent cases of incompatibilities and conflicts of interest applicable to local elected officials and parliamentarians, along with alleged law articles, which have been published on the Agency website.
1.4.4.	DA / DI Collection and publication in a separate section on the website	June 2016	All statements published on the ANI website	Delays caused by the documents transmission by the electoral offices	ANI External provider	<b>Implemented</b> Assets and interests statements submitted in the context of the 2016 election were collected, processed and published in a separate section on the Agency website. Thus, there were published about 520,000 statements of the candidates in local elections and about 11.490 statements of the candidates in parliamentary elections.
1.4.5.	Creating a special contact line for effective communication with candidates	June 2016	Special section published on the ANI website	Delays in design and programming execution	ANI External provider	<b>Implemented</b> In the context of local and parliamentary elections in 2016, A.N.I. has created a section on its website, which included one particular point of contact for effective communication with candidates. In this respect, there were appointed integrity inspectors who answered to a special telephone line providing expert guidance election candidates, about the legal regime of the declaration of assets and interests, incompatibilities and conflicts of interest. In addition, it was made available a unique e-mail address, where people and entities have submitted complaints, requests views on the legal regime of incompatibilities and conflicts of interest, or on completing assets and interests statements.  However, the Agency updated the guidelines on incompatibilities and conflicts of interest / filing assets and interests statements, available on the institution website.

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
1.4.6.	Updating the list of people under the ban to run for elective position	June 2016	Updated list of persons  Updated web section	N/a	ANI	<b>Implemented</b> National Integrity Agency continuously update the "Definitive incompatibilities - Prohibition three years" on its website. Moreover, in the context of local and parliamentary elections in 2016, A.N.I. has created a separate section that included the list of elected representatives or parliamentarians who were under ban to hold a position or public function for a period of 3 years.
1.4.7.	Creating a special section on the ANI website that would group all relevant information on the existing obligations that all the candidates in elections have.	June 2016	Special section created and available on the ANI website	Delays in design and programming execution	ANI  External provider	<b>Implemented</b> It was created a special section on the Agency's website, which gathered all relevant information about existing obligations that candidates in elections have and other informational materials. The section has been updated continuously, separately for each category of functions.

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
1.5.1.	Collaboration with the National Agency of Civil Servants in order to organize training courses on integrity compliance in public function	Permanent action, annually evaluated	No of organized common events	Lack of availability of human and technical resources	ANI ANFP	<p><b>Partially implemented</b></p> <p>A.N.I. Management initiated discussions with the National Agency of Civil Servants management regarding the organization of training courses, in the next period, about compliance integrity in public function.</p> <p>In order to inform civil servants, in 2016, two experts from ANI participated at a training program on "Preventing and combating fraud, ethics and integrity in public entities" organized by the Agency for Payments and Intervention in agriculture (APIA) where they gave a presentation about the legal framework of assets and interests declaration. The training was attended by about 120 civil servants (APIA county centers directors and executives from the central office).</p>
1.5.2.	Adopting measures in order to improve the submission process for the assets and interests statements	Permanent action, annually evaluated	<p>Number of information sent to public institutions</p> <p>Designated Contact Person within ANI</p> <p>Number of meetings held</p>	Lack of responsiveness from decision makers	ANI Decision makers in public institutions	<p><b>Implemented in 2016</b></p> <p>In 2016, due both to local and parliamentary elections, National Integrity Agency has paid maximum attention to submitting statements processes in this election, being held a videoconference with prefects across the country and transmitting, in the same time, to all prefectures, the Permanent Electoral Authority and the Central Electoral Commission, guidelines for DAI submission, and other useful information in the context of local and parliamentary elections.</p> <p>In addition, regarding the annual statements submission, the National Integrity Agency has appointed integrity inspectors responsible for assisting those concerned on completion and submission of assets and interests statements.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
						However, during 2016, the National Integrity Agency issued points of view to individuals and legal entities on how to complete and submit DAI statements.

## 1.6 Preventing corruption and integrity incidents among local elected officials

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
1.6.1	Fostering the prevention activity through spreading guides and informative materials about the consequences of breaches of integrity	June 2016	Guidelines and updated materials	N/a	ANI	<b>Implemented</b> In the context of local and parliamentary elections in 2016, the National Integrity Agency updated the Guide for completing assets and interests statements, as well as the Guide on incompatibilities and conflicts of interest, both available on the Agency website.
1.6.2	Developing and implementing projects to prevent conflicts of interest and incompatibility situations at central public administration level	Permanent action and annually evaluated	Cooperation agreements initiated  No. of common events organized	Not allocated necessary resources The lack of responsiveness decision makers at central level	ANI  Decision makers at the central public administration level	<b>Implemented in 2016</b> In 2016, ANI has initiated and / or implemented the following projects to prevent conflicts of interest and incompatibilities at central government level: <ul style="list-style-type: none"> <li>Postgraduate Program "Public Integrity and Anti-Corruption Public Policy"</li> </ul> On 17 October, ANI, in partnership with the Faculty of Political, Administrative and Communication Studies (FSPAC) within the Babes - Bolyai University in Cluj - Napoca launched the postgraduate "Public Integrity and Public Policy Anti-Corruption", which aims providing information to public functionaries regarding the anti-corruption area.

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
						<p>The program aims to improve education among certain groups of people - public functionaries, teachers, students, in order to prevent conflicts of interest in public administration.</p> <p>Currently, for this pilot course, which will last a period of six months have registered several public functionaries, both in Cluj and in other counties.</p> <ul style="list-style-type: none"> <li>Project „Joint Task Mechanism on Mapping Risk Areas in Conflict of Interest in Romania ”</li> </ul> <p>In September, the National Integrity Agency signed a cooperation agreement with the Institute for Public Policy, on the implementation of the "Joint Task Mapping Mechanism on Conflict of Interest in Risk Areas in Romania".</p> <p>The main objective of the project was to bring a new approach to the fight against corruption in Romania, by switching the focus from criminal penalties ex-post corruption by strengthening the administrative capacity of the integrity system in order to identify early risk areas and prevent conflicts of interest, while targeting the most vulnerable areas such as public procurement.</p> <p>The project is funded by the Swiss Intermediate Body and covers a period of 18 months.</p> <p>The purpose of developing this methodology is to identify public procurement procedures at high risk of conflicts of interest held in local government. Based on their observations and making a preliminary check persons in conflict of interest can be identified.</p> <p>At the same time in the period under assessment, discussions were held between representatives of the Agency and the Project Implementation Unit within D.G.A. in order to examine the possibility of launching a joint project with external financing. The overall objective of this project is developing and providing courses on issues of integrity for public officials.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
1.7.1.	Professional training of persons from public institutions designated to implement the law on DA / DI	Permanent action and annually evaluated	50 trained persons	Lack of budgetary resources	ANI Integrity Inspection S.T.I.	<p><b>Implemented in 2016</b></p> <p>In 2016, two experts from ANI participated at a training program on "Preventing and combating fraud, ethics and integrity in public entities" organized by the Agency for Payments and Intervention in Agriculture (A.P.I.A.). On this occasion, ANI representatives gave a presentation on the legal framework of assets and interests statements.</p> <p>The training was attended by about 120 civil servants (APIA county centers directors and executives from the central office).</p> <p>Following both the local and parliamentary elections in 2016, the National Integrity Agency has paid maximum attention to DAI submitting processes in this electoral process.</p> <p>To support designated persons, National Integrity Agency has appointed a person who provides ongoing support to people who want more information on how to complete and submit the statements. Moreover, there was created a dedicated e-mail to depositors seeking the use of electronic forms (with or without electronic signature) eforms@integritate.eu managed by STI.</p>
1.7.2.	Implementing „software“ programs for constant education of persons covered by Law 176/2010	January 2018	Projected program  Program implemented in 5 pilot institutions	Lack of availability of human and technical resources	ANI STI	<b>Not implemented</b>

**General objective no. 2: identification and sanction of incompatibilities, conflicts of interest, unjustified wealth and ensure the compliance with the legal regime of DA / DI submission**

**2.1 Improvement of integrity incidents evaluation**

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
2.1.1.	Continue to identify and sanction integrity incidents	Permanent action and annually evaluated	<p>Number of evaluation reports issued</p> <p>Number of administrative penalty imposed</p> <p>Number of final evaluation reports provided to the institutions for taking disciplinary action</p>	N/a	ANI	<p><b>Implemented in 2016</b></p> <p>In the reference period, integrity inspectors within ANI completed 1,310 evaluation reports, indicating the existence of integrity incidents, or the cases were closed and because of the conclusion on the evaluation reports issued by ANI, the integrity inspectors requested to the institutions to take disciplinary measures that are required, according to the law, in 159 cases.</p> <p>Integrity inspectors applied a number of 802 fines on contravention sanctions, most of them for failing to submit or late submitting of the assets and interests statements, and for not applying disciplinary sanctions because of the conclusion of the evaluation report, targeting all the categories of persons prescribed by law. At the same time, there were closed 903 files on possible offenses and sanctions for contravention.</p>
2.1.2.	Strengthening the proactive approach in monitoring the statements of assets and interests	Permanent action and annually evaluated	No. studies prepared on compliance with the legal regime of incompatibilities, conflicts of interest or unexplained wealth	N/a	ANI	<p><b>Not implemented</b></p> <p><i>The project „Joint Task Mechanism on Mapping Risk Areas in Conflict of Interest in Romania “</i></p> <p>In September 2016, the National Integrity Agency concluded a collaboration protocol with the Institute for Public Policy on the implementation of the „Joint Working Mechanism for Mapping of Risk Areas in Conflict of Interest in Romania.</p>



Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
			No. of assessment procedures initiated as a result of studies			<p>The main objective of the project was to bring a new approach to the anti-corruption fight in Romania by shifting the attention from the ex-post criminal sanctioning of the corruption acts to the strengthening of the administrative capacity of the integrity system with a view to early identification of the risk areas and prevent conflicts of interest, while targeting the most vulnerable areas such as public procurement. The project is funded by Swiss Intermediate Body and runs for 18 months.</p> <p>The purpose of developing this methodology is to identify public procurement procedures that present a high risk of conflicts of interest in the local public administration. Starting from observing them and performing a preliminary check, people in conflict of interest can be identified.</p>
2.1.3.	Improving the quality of evaluation reports issued by the integrity inspectors	Permanent action and annually evaluated	Updated operational procedure	N/a	ANI	<p><b>Implemented in 2016</b></p> <p>In order to improve the quality of the evaluation reports issued by the National Integrity Agency, was disposed the permanent updating of the operational procedures of the Integrity Inspection General Directorate was ordered. In 2016, the Operational Procedures for the Integrity Inspection have been reviewed and updated.</p> <p>Furthermore, the evaluation reports are drawn up by reference to the Agency's practice maintained by the courts, and include relevant jurisprudence in the matter of the integrity incident.</p>

## 2.2. Effective monitoring of the status of cases completed by ANI that come before the courts

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
2.2.1.	Increasing the confirmation percentage of cases completed by ANI	Permanent action and annually evaluated	The confirmations percentage for each category of incidents greater than 80%	N/a	ANI	<p><b>Implemented in 2016</b></p> <p>At the end of 2016, the situation of the A.N.I findings remained final in case of unjustified wealth, conflicts of interest and incompatibilities is as follows:</p> <ul style="list-style-type: none"> <li>• Out of 848 incompatibility cases with a final conclusion, 682 were won by A.N.I, the percentage of confirmation of the Agency's findings on incompatibilities being 80.42%;</li> <li>• Out of 219 cases of administrative conflicts of interest having final decision, 202 were won by A.N.I, the percentage of confirmation of the Agency's findings in administrative conflicts of interest was 92.24%;</li> <li>• Out of 20 cases of unjustified wealth having final decision, 16 were won by A.N.I., the percentage of confirmation of the Agency's findings in the field of unjustified wealth being 80%;</li> </ul> <p>At the same time, by the end of 2016, the courts issued 1,547 final decisions on complaints against administrative fines applied by A.N.I. Of these, in 1,268 cases, was disposed the maintenance of the contravention sanctions applied by A.N.I. Thus, the percentage of confirmation of administrative fines applied by A.N.I is 81.97%.</p>
2.2.2.	Improving the activity referring to	Permanent action and annually evaluated	Meet the deadlines of response to requests under Law no. 544	The complexity of the requests addressed to ANI that require a	ANI	<p><b>Partially implemented</b></p> <p>In order to improve the activity of assisting persons seeking clarification on the legislative framework that governs the integrity system, it was disposed to update the operational procedure of petitions in accordance with the provisions of Government Ordinance no. 27/2002</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
			<p>Updated Procedure</p> <p>Number of adopted measures</p>	<p>longer time for response.</p>		<p>regarding the regulation of the activity of petitions settlement.</p> <p>At the same time, a new operational procedure was drafted regarding the elaboration of the answers to the requests formulated based on the Law no. 544/2001 and GO no. 27/2002.</p> <p>In 2016, there have been cases where legal deadlines have been exceeded.</p> <p>Within the Integrity Inspection General Directorate, a maximum of 2 weeks deadline was set aside to resolve distributed petitions.</p> <p>In 2016, the Agency issued views on both the possibility of incompatibility and / or a conflict of interest, as well as the manner of completing / submitting the assets and interests statements.</p>
2.2.3.	<p>Improve the recovery of the amounts ordered for confiscation by final and irrevocable decisions issued by courts, following procedures regarding unjustified wealth</p>	<p>Permanent action, annually evaluated</p>	<p>Confirmation percentage for each evaluation report through which it retain unjustified difference between income and wealth acquired</p>	<p>Lack of precautionary measures</p> <p>The low level of involvement of relevant institutions and authorities</p>	<p>ANI</p> <p>ANAF</p>	<p><b>Implemented in 2016</b></p> <p>At the end of 2016, of the 20 cases of unjustified wealth remaining final, 16 were won by A.N.I through the final and irrevocable decisions of the courts. Thus, the percentage of confirmation of the Agency's findings on unjustified wealth is 80%.</p> <p>Subsequently, the National Integrity Agency initiated the activity of recovering the amounts ordered to be confiscated by the final and irrevocable decisions issued by the courts. Throughout 2016, approx. 200,000 euros were confiscated and turned to the state budget. In total, by the end of 2016, approximately 3,000,000 Euros have been confiscated and turned to the state budget, while about 430,000 Euros are under confiscation.</p>

## General objective no. 3: Administrative consolidation of the National Integrity Agency

### 3.1 Internal consolidation of ANI's administrative activities

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
3.1.1.	Optimal assurance and efficient design of financial, human and technical resources	Permanent measure assessed on an annual basis	Parliament Approved Budget Filled in Personnel Scheme Purchased/Implemented Technical Resources	Lack of political will Economic instability	ANI  The Government  The Parliament	<p><b>Implemented in 2016</b></p> <p>Through the 2016 State Budget Law number 339/2015, the expenditure budget of The National Integrity Agency for 2016 was approved totaling 34.449.000 Lei. After rectification, the National Integrity Agencies (NIA) budget for 2016 was allocated as follows:</p> <ul style="list-style-type: none"> <li>• Personnel expenditures –10.159.000 Lei;</li> <li>• Goods and Services – 19.051.000 Lei;</li> <li>• Capital expenditures – 3.855.000 Lei.</li> </ul> <p>During 2016, organizational and employment procedures to occupy 2 public management functions and 22 executive public functions through the means of a „competition“, were initiated. To fill in these positions, 194 people submitted their applications.</p> <p>On completion of the procedures relating to the organization and application competition to fill in the above-mentioned positions within the Agency, 13 of these were filled.</p> <p>In order to fill in the remainder of necessary personnel, 3 public executive functions were filled in through a transfer process.</p> <p>Throughout fiscal year 2016, the Information Technology Service allocated all of its budgeted resources in order to increase the efficiency of NIA personnel. Concerning its technical resources, these are constantly monitored in</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
						order for their allocation and use to be efficient, performant and in accordance with the necessity to fulfill work related duties. A point to be taken into account is the „moral wear“ and EOS (End of Support) and EOL (End of Line) statuses of the IT&C infrastructure dating from 2008-2009. In this regard, STI put forward proposals aimed at improving the whole IT&C infrastructure; so that, depending on the allocated budget, these proposals to be implemented.
3.1.2.	Efficiently design resources in order to boost activity	Permanent measure assessed on an annual basis	Resources designed depending on needs  Increase in the number of integrity inspectors  Training of NIA staff	Insufficient financial resources	ANI	<p><b>Partially Implemented</b></p> <p>In 2016, procedures were started in order to organize competitions for employment for a total of 12 public officials with a special status, out of which 3 were filled. This was because a small number of personnel with special status within the Agency had to deal with a large number of files, respectively 81 files/inspector.</p> <p>In order to fill in the above mentioned positions, 109 application dossiers were submitted</p> <p>During 2016, 88 employees of ANI attended training and development programs.</p>
3.1.3.	Increase in the number of externally funded projects or projects funded by the state budget	Permanent measure assessed on an annual basis	Number of initiated projects  Number implemented of projects	Lack of budgetary resources	ANI  External Partners	<p><b>Implemented in 2016</b></p> <p>During 2016, two programs that were externally financed were carried out. N.I.A participated as a partner in both:</p> <p>1. Project "Strengthening the integrated prevention systems capacity, identification and sanctioning of interest conflicts within the Republic of Moldova"</p> <p>The project aims to contribute to the strengthening of the integrity of the Republic of Moldova by increasing the capacity of integrated prevention, identify, and sanction conflicts of interest. The project includes a strategic</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
						<p>partnership between nine public entities and civil society organizations in Romania (Institute for Public Policy, National Integrity Agency, Ministry of Justice, the Prime Minister and the Public Ministry) and Moldova (Institute for Public Policy, IDIS Viitorul National Integrity Commission, Center for e-Governance). Expected outcomes are: strengthening institutional capacities of CNI in material identification / sanctions / referral criminal conflict of interest, raising awareness among local elected officials about conflicts of interest, and strengthening civil society's capacity to act on conflicts of interest. At a strategic level, the project aims to improve public policies in the field, through increased transparency and interoperability of electronic information management systems.</p> <p>2. "Joint Task Mapping Mechanism on Conflict of Interest in Risk Areas in Romania"</p> <p>In September 2016, the National Integrity Agency signed a cooperation agreement with the Institute for Public Policy, on the implementation of the "Joint Task Mapping Mechanism on Conflict of Interest in Risk Areas in Romania". The main objective of the project was to bring a new approach to the fight against corruption in Romania, by switching the focus from criminal penalties ex-post corruption acts by strengthening the administrative capacity of the system integrity in order to identify early risk areas and prevent conflicts of interest, while targeting the most vulnerable areas such as public procurements. The project is funded by the Swiss Intermediate Body and is carried out throughout a period of 18 months.</p> <p>The scope of developing this methodology consists in identifying public procurement procedures that are at an increased risk of conflicts of interest within the local government. By observing these and performing a</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
						preliminary check, people who are in a conflict of interest can be identified.
3.1.4.	Extension and operationalization of the workspace	July 2016	Purchased and operationalized workspace	Lack of availability of adequate space	ANI  The Romanian Government	<b>Partially Implemented</b>  At the end of 2016, a branch office of the National Integrity Agency, which will serve as workspace for the administrative staff of the Agency was undergoing improvements. Thus, the repartitioning and office spatial planning was completed and the networks of wire infrastructure was laid out.
3.1.5.	Improving the institutional capacity by implementing recommendations made by the external auditors	Permanent measure assessed on an annual basis	Number of implemented recommendations	Lack of resources	ANI	<b>Partially Implemented</b>  Recommendations related to the audit mission for 2015 were implemented and partially implemented at a rate of 84%.
3.1.6.	Improvement of the operational working procedures	Permanent measure assessed on an annual basis	Number of updated operational procedures	N/a	ANI	<b>Implemented</b>  In 2016 all the 176 operational procedures specific to the activity of NIA were updated / revised.
3.1.7.	Increasing the quality of the conducted activities of the Public Internal Audit Department and the implementation of recommendations laid out in the Public Internal Audit Report.	Permanent measure assessed on an annual basis	Number of employees reported to the workload  Number of audit system missions and performance audit missions included in the audit plan	Lack of budgetary resources	ANI	<b>Partially Implemented</b>  In order to improve the quality of the conducted activities of the Internal Audit department as well as the implementation of the recommendations made in the Public Internal Audit Report, a performance audit mission was carried out in 2016. At the same time, a performance audit and system audit mission was planned for 2017. The current number of personnel employed by NIA ensures that the objectives set out by the law are met. To continuously improve NIA employees from a professional point of view, they participate in professional development trainings.  ANI Internal auditors are not certified because the procedures specified in the Order OMPF nr.659 / 2015

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
			Certified internal auditors  Workspace assigned to internal auditors			and amended in 2016 by the Order of Order no. 783/2016 have not yet been approved. Because of this, internal auditors cannot be certified by CHUPIA.
3.1.8.	Elaboration of the Information Technology Policy	June 2016	Elaborated Information Technology Policy	N/a	ANI	<b>Implemented</b> In April 2016, the Department of Information Technology has developed a document called IT Strategy for 2015-2020, approved by the Board of N.I.A.

### 3.2 Improving human resources policy

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
3.2.1.	Increasing the number of employees in supporting departments for Integrity Inspection	December 2016	Minimum 5 persons employed	Insufficient number of posts budgeted	ANI	<b>Implemented</b> During 2016 procedures were initiated procedures for organizing and conducting contests for a number of 7 public function positions within the support compartments for Integrity Inspection, out of which 1 public leadership function position and 6 public executive function positions.  In order to fill these positions, 79 applications were submitted for the competition.
3.2.2.	Increasing the number of integrity inspectors	Permanent measure assessed on an	Minimum 5 integrity inspectors employed / year	Insufficient number of posts budgeted	ANI	<b>Partially Implemented</b> During 2016 procedures were initiated procedures for organizing and conducting contests for a number of 12 public function positions with special status. In the end, only 3 of these positions were filled in.



Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
		annual basis		Low exam pass rate		<p>In order to fill these positions, 109 applications were submitted for the competition.</p> <p>At the same time, during 2016, an integrity inspector was reintegrated on his position.</p>
3.2.3.	Elaborating the human resources management policy	January 2017	Issued policy	n/a	ANI	<p><b>Not Implemented</b></p> <p>At the end of 2016, the Human Resources Policy was in the process of being elaborated.</p>
3.2.4.	Training ANI's experts on train the trainers component	Permanent measure assessed on an annual basis	Minimum 2 persons trained / year	Lack of training offers	ANI External suppliers	<p><b>Not Implemented</b></p> <p>During 2016, ANI experts did not participate in any trainings on „train the trainers“ component.</p>
3.2.5.	Integrity inspectors and administrative staff training	Permanent measure assessed on an annual basis	Minimum 15 persons trained / year	Lack of training offers Lack of budgetary resources	ANI External suppliers	<p><b>Implemented in 2016</b></p> <p>During 2016, 88 ANI employees attended training and development programs as follows:</p> <ul style="list-style-type: none"> <li>• 1 high ranking public servant</li> <li>• 44 employees with special status public function positions</li> <li>• 43 employees with contract based and public functions</li> </ul>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
3.3.1.	Elaborating the communication policy	January 2017	Issued policy	N/a	ANI	<b>Not Implemented</b> At the end of 2016, the Communication Policy was in the process of being elaborated.
3.3.2.	Improving the communication process of information of public interest including those available on the Agency website	Permanent measure assessed on an annual basis	Web sections updated annually  Improved operational procedures	N/a	ANI	<b>Implemented in 2016</b> The web section on the website of the Agency is continually updated. 135 public information materials were posted on the Agencies Internet page in 2016 In the context of the local and parliamentary elections of 2016, a separate section on the ANI website was created, section in which the following have been published: guides with regards to incompatibilities and conflicts of interest/ how to fill in wealth statements and interest, electronic forms of wealth statements and interest, enforced legislation by referring to recurrent cases of incompatibility and conflicts of interest applicable to local elected officials and MP's (members of parliament). Moreover, the operational procedure OP 01 / D.C.R.P.S. developing responses to requests under Law no. 544/2001 has been updated. In order to improve the access to public interest information, ANI is currently engaged in a centralization process of all statistical information on persons for whom integrity incidents were recorded. This information will be available in a separate section of its website.
3.3.3.	Modernizing communication tools	January 2017 / Permanent measure assessed	Updating the ANI's presentation brochure	Lack of budgetary resources	ANI  External supplier	<b>Partially Implemented</b> The Presentation Booklet of A.N.I's activity will be updated and published during 2017 when the Agency will celebrate 10 years of activity.

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as at 31.12.2016
		on an annual basis	<p>Using newsletter and social media tools</p> <p>Using info graphs to present relevant information</p>			<p>Currently, following the reorganization of the Directorate for Communication and the one of Public Relations and Strategy, the Newsletter's transmission is suspended. In this sense, the training of the current personnel of the Directorate is taken into account.</p> <p>In order to improve the level of knowledge and understanding of the Agency's activities on a local and regional level, A.N.I. used social media networks (Facebook) for dissemination of issued public information.</p> <p>In the second half of 2016, the National Integrity Agency began the process for acquisition of infographic design services in order to present its activity. During 2016, the first of the infographics was finalized, which has, as its main theme, the "PREVENT" system. During 2017, 9 other infographics are scheduled to be launched, each of them with different themes such as: the relationship between A.N.I and the Parliament, the functionality of the "PREVENT" system, the way in which A.N.I contributed to the state budget.</p>

## 4.1 Ensure transparency in respect of declarations of assets and interests

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation 31.12.2016
4.1.1.	Increase the number of people submitting assets and interest statements in electronic format	December 2019	20,000 declarations of assets and interests filed electronically	<p>People's refusal to submit electronic statements</p> <p>Lack of resources</p>	<p>ANI</p> <p>Persons who are required to submit DA / DI</p> <p>Institutions and public authorities</p>	<p><b>Not implemented</b></p> <p>A protocol with the Ministry of Regional Development and Public Administration was concluded through which the two institutions collaborate to separately exercise their competencies as well as ensuring a better information process with regards to the legal framework for submitting declarations of assets and interests</p> <p>In addition, ANI is also considering concluding protocols with other institutions, protocols aimed at allowing the submission of assets and interests declarations electronically.</p>
4.1.2.	Ensuring continuity on public declarations of assets and interests and helping institutions in a transparent presentation of declarations of assets and interests	2018	<p>Resumed tender procedure</p> <p>Awarded contract</p>	<p>Lack of budgetary resources</p>	ANI	<p><b>Not Implemented</b></p> <p>Throughout the period of 2016, the continuity of the publication of declarations of assets and interests on the institution's website was ensured. This was based on a framework agreement of archiving services and other related services, which included, among others, the handling and processing of declarations as well as the hosting of the website and portal.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation 31.12.2016
4.2.1.	Developing the English version of the Website	January 2017	Translated sections of the web page	Lack of budgetary resources	ANI External supplier	<b>Not Implemented</b>
4.2.2.	Constantly completion of sections	Permanent measure assessed on an annual basis	Permanently updated sections	Lack of human resources	ANI	<p><b>Implemented in 2016</b></p> <p>Based on an internal note regarding the methodology for updating the agency's website content sections, each department within the institution, which is in charge of a section / subsection can require whenever necessary the publication of information or data. The sections available on the Agency website are constantly updated as follows:</p> <ul style="list-style-type: none"> <li>- Definitive Incompatibilities - Prohibition three years;</li> <li>- Pending cases in court;</li> <li>-Definitive and irrevocable judgments of the courts;</li> <li>-Minutes on contravention sanctioning;</li> <li>- Legislation viewpoints;</li> <li>- Organization;</li> <li>- Budget and public procurement;</li> <li>- Statements of assets;</li> <li>- Legislation;</li> <li>- Reports and audit;</li> <li>- A.N.I. Careers;</li> <li>- Cooperation.</li> </ul> <p>In addition, in 2016, the guide to fill in the Declaration of Assets and Interests as well as the guide regarding Incompatibilities and Conflicts of Interest were updated. The later mentioned also includes a section of questions and answers, being available on the Agencies website.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation 31.12.2016
						Moreover, 135 public information materials were posted on the agencies internet page.
4.2.3.	Publication of final and irrevocable decisions issued by courts on matters regarding wealth confiscation, conflicts of interest and incompatibilities	Permanent measure assessed on an annual basis	No. of published decisions	N/a	ANI	<b>Implemented in 2016</b> Case-law on confiscation of assets, conflicts of interest and incompatibilities was posted on the website of ANI (a number of 67 final and binding court decisions communicated to the Agency in 2016 were posted). The total number of final and binding court decided posted on the website of the Agency totals 152. Operational procedures have been developed for a better dissemination of the jurisprudence of the courts in order to strengthen the evaluation work carried out by officers of integrity.

## General objective no. 5: Cooperation with institutional and non-institutional entities

### 5.1 Cooperation at the national level

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation 31.12.2016
5.1.1.	Disseminating the concept of integrity in schools	Permanent measure assessed on an annual basis	No. of common events organized  No. cooperation agreements initiated	Lack of budgetary resources  Lack of availability of human resources	ANI  Educational institutions	<b>Implemented in 2016</b> At the request of the Faculty of Political, Administrative and Communication Sciences, from Babeş-Bolyai University in Cluj-Napoca from April 2016, a group of students participated in a study and information visit, organized at the Agency's headquarters. The purpose of the visit was to

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation 31.12.2016
						<p>present the legislative and institutional framework of the National Integrity Agency.</p> <p>Meanwhile, in 2016, the National Integrity Agency, in partnership with the Faculty of Political, Administrative and Communication Studies (FSPAC) of Babeş - Bolyai University in Cluj - Napoca, launched the postgraduate program "Public Integrity and Public Policy on Anticorruption" , which aims to provide information in the field of anti-corruption to civil servants.</p> <p>In October 2016, ANI's representatives attended the conference regarding the launching of the program that aims to increase the level of education among certain groups of people – civil servants, teachers, students – in order to prevent conflicts of interests in public administration.</p> <p>Moreover, National Integrity Agency initiated discussions with other universities in Romania, to organize programs that aim to increase the education level in the field of integrity.</p> <p>In addition, in 2016, the General Secretary of National Integrity Agency participated to the project „Engaging the Future: Development Cooperation for High School Students” financed by MAE (Official Assistance for Development) and implemented by Romanian Center for European Policies in partnership with United Nations Development Programme (UNDP). One of the main objectives of the project is to conduct a campaign in 8 high schools in Bucharest (for XI and XII grades) in order to raise awareness and general interest for Romanian Cooperation for Development Programme. In this respect, Mr. Silviu-Ioan POPA was invited as a speaker at the Mihai Eminescu National College.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation 31.12.2016
5.1.2.	Fostering of cooperation with public institutions and authorities, as well as with the associative structures of local authorities	Permanent measure assessed on an annual basis	No. of common events organized	Lack of availability of budgetary and human resources	<p>National Integrity Agency</p> <p>National Union of County Councils in Romania</p> <p>Association of Municipalities in Romania</p> <p>Association of Romanian Towns</p> <p>Association of Communes of Romania</p>	<p><b>Implemented in 2016</b></p> <p>In the context of local elections in 2016, with the help of the Ministry of Internal Affairs, A.N.I. organized a video conference with all the prefects in the territory, which was meant to optimize the process of completing and submitting assets and interest declarations, as well as disseminating useful information on improving the flow of transmission the assets and interests statements to A.N.I.</p> <p>Moreover, in order to clarify the difficulties in completing the statements and improve the system of declaring and submitting the assets and interest statements, the Agency sent to all the counties prefects the electronic forms of assets and interests statements, the guidelines for completing the statements of assets and interest, the guidelines on incompatibilities and conflicts of interests.</p> <p>In addition, the National Agency of Integrity concluded an agreement with the Institute for Public Policies regarding the implementation of „Joint Task Mechanism on Mapping Risk Areas in Conflict of Interest in Romania” project, a project initiated in collaboration with the Associations of secretaries at the cities and counties level.</p> <p>The main objective of the project was to bring a new approach to the fight against anti-corruption in Romania, by shifting the attention from ex-post sanctioning of corruption acts to strengthening the administrative capacity of integrity system, with the purpose of early identification of the risk areas and preventing conflicts of interest, while targeting the most vulnerable areas, such as public procurement.</p>
5.1.3.	Develop and strengthen	Permanent measure assessed	No. of common events organized	availability of budgetary and	ANI	<b>Implemented in 2016</b>



Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation 31.12.2016
	partnerships with NGOs	on an annual basis	No. of cooperation agreements initiated	human resources	NGOs	National Integrity Agency concluded two protocols with the Institute of Public Policies, targeting the Joint Task Mechanism on Mapping Risk Areas in Conflict of Interest in Romania project and the project „Strengthening the Capacity of the Integrated System for Prevention, Identification and Sanctioning of Conflicts of Interest in the Republic of Moldova”.
5.1.4.	Providing viewpoints to entities that have legislative initiative regarding drafting laws related to ANI’s objects of activity	Permanent measure assessed on an annual basis	No. of viewpoints provided	Refusal of the authorities to seek viewpoints from ANI	ANI DRP	<p><b>Implemented in 2016</b></p> <p>The National Integrity Agency constantly expresses its opinion on the normative acts drafts regulating its activity.</p> <p>In 2016, A.N.I. issued 10 viewpoints, as follows:</p> <ul style="list-style-type: none"> <li>• one negative viewpoint regarding the modification of Law no. 215/2001 on local public administration;</li> <li>• one favorable viewpoint with observations regarding the modification of Law no. 95/2006 on health reform;</li> <li>• one negative viewpoint regarding the modification of Law no. 96/2006 on Deputies and Senators Statute;</li> <li>• one favorable viewpoint, with observations, regarding the amendment of the Government Emergency Ordinance to complete the Government Ordinance no. 119/1999 on internal managerial control and preventive financial control;</li> <li>• one negative viewpoint regarding the modification of the Law no. 41/1994 on the organization and functioning of the Romanian Radio Broadcasting Corporation and the Romanian Television Society;</li> </ul>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation 31.12.2016
						<ul style="list-style-type: none"> <li>• one negative viewpoint regarding the modification of the Law no. 188/1999 on the Statute of civil servants;</li> <li>• three negative viewpoints regarding the amendment of the Law no. 161/2003 on certain measures for ensuring transparency in the exercise of public dignities, public functions and business environment, preventing and sanctioning corruption;</li> </ul> <p>Comments on the draft of Government Decision approving the methodological norms for the application of the provisions regarding the award of the public procurement contract / framework agreement of the Law no. 98/2016 on Government Procurement, namely the Government Decision on approving the methodological norms for the application of the provisions regarding the award of the Sectoral Contract / Framework Agreement of Law no. 99/2016 on sector acquisitions.</p>
5.1.5.	ANI involvement in implementing the objectives and measures of National Anticorruption Strategy	Permanent measure assessed on an annual basis	<p>No. of common activities</p> <p>At least two experts appointed to assist the Technical Secretariat</p> <p>No. of meetings</p> <p>No. of evaluation missions involving experts ANI</p>	Lack of availability of human resources	ANI	<p><b>Implemented in 2016</b></p> <p>The process of implementing the National Strategy 2016 - 2020, which was adopted by H.G. No. 583/2016, was started.</p> <p>During the first meeting of the cooperation platform of the independent authorities and anti-corruption institutions, in October 2016, the implications of adopting the new Strategy were discussed.</p> <p>In November, the Declaration of Accession of the National Integrity Agency was submitted, as well as an inventory of the corruption risks identified at the Agency level.</p> <p>In the second stage of the SNA implementation process, two representatives from the institution were appointed responsible for implementing the</p>

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						Strategy and the integrity plan requested by the SNA 2016-2020 Technical Secretariat was developed.
5.1.6.	Harmonization and clarification of the legal framework on incompatibilities	June 2018	<p>Working group established</p> <p>No. of proposals submitted</p> <p>Legislative changes made</p>	<p>Legislative instability</p> <p>Legislative delay</p> <p>The dilution of the existing legislative framework</p>	<p>ANI</p> <p>MJ</p>	<p><b>Partially implemented</b></p> <p>Taking into account the initiative to harmonize the legislation on conflicts of interest and incompatibilities regarding the public function, a working group for the elaboration of the administrative code was created at the level of the Ministry of Regional Development, Public Administration and European Funds. In 2016, two experts from the Agency were co-opted in this working group, participating in a series of meetings to bring about changes to the current legislation. The ANI representatives participated in 5 working meetings, and made 10 proposals to amend the legislation.</p> <p>Moreover, Agency's experts participated in the working sub-group meetings created at National Public Servants Agency, regarding the amendment of new law no. 188/1999 articles on Public Servants Statutes. ANI representatives participated in 5 working meetings and formulated 10 proposals to amend the legislation.</p>

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5.2.1.	Agency involvement in technical assistance projects	Permanent measure assessed on an annual basis	No. of activities  No. of experts appointed	Lack of resources  Lack of availability of experts	ANI  MAE  Civil society	<p><b>Implemented in 2016</b></p> <p>In September, the Secretary General of the Agency participated as an expert at the work meeting organized in Chisinau. This work meeting revolved around the „Consolidation of the integrated system of identification, prevention and counteraction of conflicts of interest within the Republic of Moldova through inter institutional and partnership based cooperation with competent stakeholders in this field from Romania” project; project organized by A.N.I in partnership with the Institute of Public Politics and financed by the Ministry of Foreign Affairs through UNDP aiming to increase the administrative capacity of the Agency to liaise with local administration staff on conflict of interest matters. Representatives of ANI, representatives of the former National Commission of Integrity as well as representatives of several Nongovernmental Organizations were all present at the event.</p>
5.2.2.	Continuing exporting best practices referring to Romanian system of declaration of assets and interests	Permanent measure assessed on an annual basis	No. of activities	Lack of resources  Lack of availability of experts	ANI  MAE  Civil society	<p><b>Implemented in 2016</b></p> <p>The National Integrity Agency was actively involved in exporting good practices with regards to the Romanian system of asset and interests declaration as follows:</p> <ul style="list-style-type: none"> <li>A representative of the Agency was invited by the United Nations Development Programme (UNDP) in Ukraine, to take part in the debate organized in Kiev on „Transparency and Integrity: Will Ukraine Make It In 2016?”. During the second panel of the debate, „Integrity in action: managing conflicts of interest in a transitional public service culture”, the A.N.I expert held a presentation on the Agency’s</li> </ul>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation 31.12.2016
						<p>ongoing work and experience in investigating and preventing unjustified wealth, conflicts of interest, incompatibilities as well as touching upon the Romanian system of declaring wealth statements and interests. The main goal of the event was to support, through dissemination of experience and good practices of different institutions and anti-corruption authorities, the implementation of similar, fully functional prevention mechanism in Ukraine.</p> <ul style="list-style-type: none"> <li>• In May, an expert from A.N.I attended an event organized by the Regional Anticorruption Initiative; the „Regional Meeting of the Oversight Bodies for Asset Disclosure and Conflict of Interest”. The Agencies representative presented different examples of good practices seen throughout A.N.I’s activity concerning investigations on unjustified wealth. The main scope of this event was to strengthen regional cooperation concerning data exchange on an international level as well as exchanging opinions and formulating observations concerning the international agreement project on facilitating the exchange of information.</li> <li>• In collaboration with the Romanian Embassy in Georgia, A.N.I organized a study visit for a Georgian delegation of the Public Service Bureau, visit aimed at sharing the Agencies experience with regards to the implementation and monitoring of the declaration of wealth and interests system. Throughout the two-day study visit, the Georgian experts met with A.N.I experts, specialists from within the Expert Forum Association and with experts from the Ministry of European Funds.</li> </ul>

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						<ul style="list-style-type: none"> <li>• In May, a delegation from the Egyptian Authority of Administrative Control made a study visit at A.N.I's headquarters. This was made possible with the support of the Romanian National Anticorruption Directorate and was organized within frame of the "Capacity Strengthening of the Anti-Corruption Institutions to Combat Corruption in Egypt" project; project financed by TAIEX. A.N.I representatives presented the Egyptian delegates a number of aspects covering the institutional structure of the Agency, the results obtained during wealth evaluations, checks on incompatibilities and conflicts of interest and how these results are used (what their role is).</li> <li>• In June, a National Integrity Agency delegation participated a conference organized by the Association of Southeast Asian Nations (ASEAN) in Manila that covered the theme of „Innovative Approaches to Financial Disclosure". This conference was made possible with support from the World Bank.</li> <li>• At the invitation of the World Bank, the Secretary General of the Agency had two interventions as an expert within sessions on wealth and interest declarations of public servants. The focus was on presenting knowledge accumulated by the agency whilst combating the accumulation of unjustified wealth by public servants. This event was a premier on both regional and global level as it brought together a large number of anti-corruption practitioners and senior representatives from member countries of the Association of Southeast Asian Nations (ASEAN) as well as from its outside; attributes of these members included amongst others, the identification of unjustified wealth and</li> </ul>

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						<p>combating money laundering activities. The scope of this event was to facilitate the exchange of experience, with emphasis on the lessons learned.</p> <ul style="list-style-type: none"> <li>• An integrity inspector was invited by the European Commission (Direcția Vecinătate și Negocieri privind Extinderea) to participate during the month of June at a work meeting touching upon the theme of „EU Anti-Corruption Initiative of Ukraine”. Debates that took place during this meeting focused on the fight against corruption taking place Ukraine that represents nowadays a key political priority. At the same time, this process implies a complex effort, requiring the expertise and experience that the European Union has to offer.</li> <li>• At the initiative of the Ministry of Justice, a delegation of Montenegro’s Corruption Prevention Agency was invited to participate in a study visit at A.N.I’s headquarters. During the talks that took place, A.N.I experts presented the Agencies results concerning the management of the wealth and interest declaration system as well as relevant case studies concerning the activity of integrity inspectors.</li> <li>• At the initiative of the Expert Forum Association, a delegation of 12 Governmental and Non-Governmental Moldavian representatives conducted a study visit in Romania, in the month of June. During this visit, they were presented the following by integrity inspectors: the institutional framework A.N.I as well as the results obtained after evaluations of wealth and integrity and conflicts of interest. This study visit was part of the „Conturarea agendei de modernizare a Republicii Moldova” project,</li> </ul>

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						<p>financed through a grant of The Black Sea Trust for Regional Cooperation.</p> <ul style="list-style-type: none"> <li>• In August, a representative of the Agency participated at a work meeting organized in Kiev by the World Bank. The theme of this meeting was the „Verification of Asset Declarations and Effective Communication with Filers”, throughout which, the A.N.I expert presented relevant aspects drawn from the work of integrity inspectors and put forward the Agencies experience with regards to the investigation of several complex cases of incompatibility, conflict of interest and unjustified wealth identification.</li> <li>• At the initiative of the National Anticorruption Directorate, a delegation of prosecutors and investigators from within the Special Prosecutors Office of Macedonia and representatives of the Macedonian Center for International Cooperation participated in an experience exchange with integrity inspectors from the National Integrity Agency, in the month of September. Representatives of the Agency highlighted the role and the results of the Agency in evaluating wealth, incompatibilities and conflicts of interest as well as present relevant case studies from the work of integrity inspectors.</li> <li>• In September, at the request of a group of journalists from the Republic of Moldavia, Mr. Silviu POPA, the Secretary General of the Agency, gave an interview to Chisinau’s „Ziarul de Garda” newspaper. This all happened within the context of a visit at the Agencies headquarters. Mr. Silviu POPA presented the Romanian system for combating corruption through administrative means. He also talked about the challenges of establishing the National Integrity Authority of the Republic of Moldavia.</li> </ul>



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						<ul style="list-style-type: none"> <li>• During the same period of 2016, a group of journalists and representatives of different Macedonian Civil Societies expressed their interest in conducting a study visit at the Agencies headquarters. During this visit, A.N.I representatives presented aspects concerning the institutional structure of the Agency the results obtained during wealth evaluations, checks on incompatibilities and conflicts of interest and how these results are used (what their role is).</li> <li>• In October, an integrity inspector participated at the „3rd Regional Meeting of Oversight Bodies for Asset Disclosure and Conflict of Interest“ work meeting in Sofia. This event was organized by the Regional Anticorruption Initiative (RAI) and supported by the Regional Cooperation Council and by the Bulgarian Commission for prevention and identification of conflicts of interest. During this meeting, the Agencies representative presented relevant aspects from the work of integrity inspectors, aspects concerning obtaining information from foreign institutions as to investigate/provide a solution to complex causes. Debates also took place concerning the form and content conditions of the international treaty concerning data and information exchange.</li> <li>• At the beginning of November, the Agency management participated in Chisinau at the Romanian Forum - Republic of Moldova in the field of Justice „Justice Reform and the Fight Against Corruption in a European Perspective " Justice Reform and the Fight Against Corruption in a European Perspective“ organized by the Romanian Ministry of Justice together with the Moldavian Ministry of Justice. This was the</li> </ul>

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						<p>events first edition and it aimed at formalizing a cooperation platform between the two states through a multidisciplinary approach to help strengthen bilateral cooperation in the field of justice and in Moldova's fight against corruption. This Forum brought together Romanian and Moldavian representatives of the main institutions from the field of Justice and Civil Society.</p> <ul style="list-style-type: none"> <li>• In November, the Secretary General of the Agency, Mr. Silviu-Ioan POPA, participated at the 16th Annual Conference and General Meeting of the EPAC/EACN network organized in Riga. During this General Meeting, where approximately 100 delegates took part, the new president of the EPAC/EACN, Mr. Andreas Wieselthaler (Director of the Austrian Anticorruption Authority) was elected. During this event, talks about the newest developments took place and the Riga Declaration was adopted. This Event was hosted and organized by the Latvian Corruption Prevention and Combating Bureau (KNAB). At the end of the meeting, the 2016 Declaration from Riga was adopted.</li> <li>• During the first half of December, the leadership of the Agency participated in Paris at the launch of the „Network for Integrity” – the first international platform of its kind, dedicated exclusively to the field of integrity. On this occasion, the National Integrity Agency, alongside 14 other institutions involved in the fight against corruption became a founding member of this Network. This platform was created with the sole purpose to facilitate experience/knowledge and good practices exchange in the field of wealth and interest</li> </ul>

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						<p>declarations, methods of investigating integrity incidents. Moreover, this platform serves to provide the necessary framework meant to help states that want to implement a similar system of integrity and it brings together institutions from France, Italy, Croatia, Greece, Latvia, South Korea, Peru, Mexico etc. The Launch of the Integrity Network was carried out under the auspices of the Open Government Partnership Global Summit (OGP) hosted by France.</p> <ul style="list-style-type: none"> <li>At the request of its Serbian counterparts, a study visit took place in December at the A.N.I headquarters. This study visit was focused on good practices and experience exchange, with emphasis on the results of A.N.I evaluations of wealth, incompatibilities and conflicts of interest.</li> </ul>
5.2.3.	Cooperation in activities belonging to organizations of which ANI is a part of	Permanent measure assessed on an annual basis	No. of activities	Lack of availability of experts	ANI  Regional / international organizations	<p><b>Implemented in 2016</b> <i>The Network of European Partnership Against Corruption (EPAC / EACN)</i></p> <p>In November, Mr. Silviu - Ioan POPA, General Secretary of the Agency, participated in Riga, at the 16th Annual Conference and the EPAC / EACN Network General Meeting.</p> <p>The 2016 conference, hosted and organized by the Office for Prevention and Fight against Corruption (KNAB) in Latvia, brought together about 100 delegates from the EPAC / EACN network.</p> <p>During plenary sessions and workshops were addressed issues of concern, such as the role of the private sector, the fight against high-level corruption, and the phenomenon of pantouflage. In addition, the President of the Group of States Against Corruption (GRECO) presented the prospects of the fifth GRECO evaluation round.</p>

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						<p>At the General Meeting on November 17, Mr. Andreas Wieselthaler, Director of the Austrian Anti-Corruption Authority (BAK), was elected the new EPAC / EACN Network President. The General Inspectorate of Georgia's Ministry of Internal Affairs also became a member of the EPAC / EACN network, while the Regional Anti-Corruption Initiative (RAI) was accepted as an observer. The General Meeting ended with the adoption of the Riga Declaration.</p> <p><i>World Bank</i></p> <p>In May, an ANI representative attended a World Bank teleconference on "Getting the Full Picture of Public Officials: A Practical Guide to Financial Disclosure".</p> <p>In June, a National Integrity Agency delegation attended the conference of the Association of Southeast Asian Nations (ASEAN), held in Manila, with the support of the World Bank, on „Innovative Approaches to Financial Disclosure“.</p> <p>At the World Bank invitation, the General Secretary of the Agency had two interventions as an expert during the sessions on wealth and interests statements of civil servants, focused on presenting the Agency's experience in combating the accumulation of unjustified assets by civil servants.</p> <p>The event was a premiere at regional and global level, as it brought together a large number of anti-corruption practitioners and senior representatives from the countries members of the Asian Association of Asian Nations (ASEAN) and outside, with attributions in identifying unjustified assets and combating money laundering, aiming to ensure the exchange of experience, with emphasis on the lessons learned.</p> <p>In mid-June, the Agency's leadership attended the International Anti-Corruption Practitioner Conference, organized by the French Ministry of</p>

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						<p>Justice, with the support of the World Bank and hosted by the Organization for Economic Cooperation and Development (OECD) in Paris.</p> <p>Thus, at the session dedicated to the identification and prevention of conflicts of interest and unjustified assets, the President of the Agency sustained a presentation on integrity in the exercise of public functions and dignities. The discussions held during this event focused on finding an answer to the global challenges of cooperation in the fight against corruption, and at the same time identifying good practices and potential ways to address these challenges.</p> <p>In August, a representative of the Agency attended a working meeting organized by the World Bank in Kiev on "Verification of Asset Declarations and Effective Communication with Filers". On this occasion, the A.N.I expert presented relevant aspects of the activity of integrity inspectors, as well as the experience of the Agency regarding handling of complex cases to identify incompatibilities, conflicts of interest and unjustified assets.</p> <p>The General Secretary of the Agency received the work visit of representatives of the World Bank in October, conducted in the context of a study on the anti-corruption framework in Romania. On this occasion, there were discussed relevant aspects of the ANI activity.</p> <p>The work visit is in line with the objectives of the World Bank Strategy regarding Country Partnership for Romania, which aims, among other things, to support the improvement of the quality of governance in Romania.</p> <p><i>Network for Integrity</i></p>

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						<p>In the first part of December, the Agency's leadership attended, in Paris, the launching event of Network for Integrity, the first international platform dedicated exclusively to integrity. On this occasion, the National Integrity Agency, along with 14 other institutions involved in the fight against corruption, became a founding member of the Network.</p> <p>The platform designed to facilitate the exchange of experience and best practices in the field of transparency of assets and interest declarations, integrity investigation methods, and to create the necessary framework to help states that wish to implement similar systems of integrity, brings together institutions from France, Italy, Croatia, Greece, Latvia, South Korea, Peru, Mexico etc.</p> <p>The Launch of the Integrity Network was carried out under the auspices of the World Partnership for Open Government in Paris.</p> <p><i>United Nations Development Programme (UNDP)</i></p> <p>In March, a representative of the Agency was invited by the United Nations Development Programme (UNDP) in Ukraine, to take part in the debate organized in Kiev on „Transparency and Integrity: Will Ukraine Make It In 2016?“. During the second panel of the debate, „Integrity in action: managing conflicts of interest in a transitional public service culture“, the A.N.I expert held a presentation on the Agency's ongoing work and experience in investigating and preventing unjustified wealth, conflicts of interest, incompatibilities as well as touching upon the Romanian system of declaring wealth statements and interests. The main goal of the event was to support, through dissemination of experience and good practices of different institutions and anti-corruption</p>

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						<p>authorities, the implementation of similar, fully functional prevention mechanism in Ukraine</p> <p>In September, the Secretary General of the Agency participated as an expert at the work meeting organized in Chisinau. This work meeting revolved around the „Consolidation of the integrated system of identification, prevention and counteraction of conflicts of interest within the Republic of Moldova through inter-institutional and partnership based cooperation with competent stakeholders in this field from Romania” project; project organized by A.N.I in partnership with the Institute of Public Politics and financed by the Ministry of Foreign Affairs through UNDP aiming to increase the administrative capacity of the Agency to liaise with local administration staff on conflict of interest matters. Representatives of ANI, representatives of the former National Commission of Integrity as well as representatives of several Nongovernmental Organizations were all present at the event.</p> <p>In December 2016, the General Secretary of the Agency received the working visit of a UNDP representative, Ms. Heegyun Jung, the United Nations Department of Political Affairs (DPA), Europe. The purpose of the visit was to present the work of the Agency as well as the objectives of the next strategic cycle. The meeting also represented an opportunity in the context of the UNDP representative being responsible for developing analyzes and briefings on Romania used by senior UN officials in meetings with representatives of the Romanian Government.</p> <p>Also, in 2016, the General Secretary of the Agency participated in the project "Engaging the Future: Development Cooperation for High School Students" funded by MAE (Official Development Assistance) and implemented by the Romanian Center for European Policies in partnership with United Nations</p>

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						<p>Development Program (UNDP). One of the main objectives of the project is to conduct a campaign in 8 high schools in Bucharest (for XI and XII grades) in order to raise the awareness and general interest for Romania's development cooperation program. In this respect, Mr. Silviu-Ioan POPA was invited as a speaker at the Mihai Eminescu National College.</p> <p><i>OECD - Organization for Economic Cooperation and Development</i></p> <p>In mid-June, the Agency's leadership attended the International Anti-Corruption Practitioner Conference, organized by the French Ministry of Justice, with the support of the World Bank and hosted by the Organization for Economic Cooperation and Development (OECD) in Paris.</p> <p>Thus, at the session dedicated to the identification and prevention of conflicts of interest and unjustified assets, the President of the Agency sustained a presentation on integrity in the exercise of public functions and dignities.</p> <p>The discussions held during this event focused on finding an answer to the global challenges of cooperation in the fight against corruption, and at the same time identifying good practices and potential ways to address these challenges.</p>





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