



FINAL REPORT OF FACTUAL FINDINGS

AGENȚIA NAȚIONALĂ DE INTEGRITATE (National Integrity Agency)

External audit of the ANI management for the year 2013

Bucharest, April 2014



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1. Executive summary

Introduction

According to the contract no. 1508 from January 29, 2014 (hereinafter “the Contract”), SC Deloitte Audit SRL (hereinafter “Deloitte”, “we”) 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 the Law no. 144/2007 on the establishment, organization and functioning of ANI with subsequent completions and amendments (hereinafter “Law no. 144/2007”).

The agreed work phases for performing the audit procedures comprised of:

- Understanding project's scope;
- Planning the audit procedures;
- Performing the audit plan;
- Forming the conclusions and drafting the audit report.

Engagement's audit objectives and applicability area

The quality of ANI's management was assessed during February 3, 2014 and March 7, 2014, by a team of Deloitte qualified professionals, based on interviews, examination of documentation and detailed audit tests.

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

The audit engagement was performed in compliance with:

- The terms of reference included in the technical offer “External audit of ANI's management for the year 2013”, 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 2013 exclusively, unless otherwise mentioned.

Specific aspects of the audit engagement for the year 2013

In respect to the specific activity of the Information Technology Directorate we mention the fact that during 2013, SAP accounting information system became fully operational and was used by National Integrity Agency's personnel.

Procedures performed and factual findings

We have planned and performed the audit program in accordance to the objective and applicability area 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 an audit report in accordance with the International Standards on Related Services (ISRS) – “4400 Engagements to perform agreed – upon procedures”. The result of the procedures performed consists of a total number of 22 observations. The procedures performed during this engagement are neither a financial audit, nor a review and thus we do not express any assurance regarding ANI financial statements for the year ended December 31, 2013.

We have also assessed the remediation status of the deficiencies identified during the external audit of ANI management for the years 2009, 2010 and 2011 that were not assessed as “implemented” as at

31.12.2012, the implementation status of the recommendations for the 2012 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 wealth, conflicts of interest and incompatibilities.

The remediation status of the deficiencies identified during the external audit of the ANI management for the years 2009, 2010, 2011 and 2012 is presented within the table below:

Total number of deficiencies remedied	8
Total number of deficiencies partially implemented	12
Total number of deficiencies not implemented	6
Total number of deficiencies that are not applicable considering the improvements performed at ANI level	1

Conclusions

Our conclusions based upon 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 2013, we have identified ANI's functionality parameters, which are based upon ANI's management efforts to improve the processes and to increase the efficiency of the activity in order to achieve the objectives planned. These efforts were:

- Implementation of SAP information system, which led to improvement of the management control system ensuring an increased traceability of the information flow at Agency level, as well as an increase of personnel accountability at each structure's level;
- Implementation of SMIS code 34972 - Efficient public services by simplifying the filling, archiving procedures and analyses of documents at the National Integrity Agency level and facilitating electronic access to public information, adding value to activity of the Integrity Inspectorate, the Legal, Public Relations and Communication General Directorate and the Communication, Public Relations and Strategy Directorate, using software modules for intelligent analysis and reporting;
- Continuing the efforts in implementing the measures within the Action Plan for the implementation of the Strategy for control and prevention in accumulating unjustified wealth, conflicts of interest and incompatibilities;
- Professional training and certification of five integrity inspectors in financial analysis domain, with support from Serious Organized Crime Agency (SOCA) and London College of Policing, within SMIS code 34972 - Efficient public services by simplifying the filling, archiving procedures and analyses of documents at the National Integrity Agency level and facilitating electronic access to public information;
- Active involvement of integrity inspectors in the process of monitoring and assessment of Anticorruption National Strategy for 2012 – 2015 implementation, at the level of central and local public institutions;
- Qualitative improvement of assessment reports by inserting the chapter jurisprudence;
- Dynamic cooperation with institutions involved in combating corruption by prioritizing solving complaints submitted by them to the Agency;
- Active involvement from integrity inspectors in the process of informing and professional training of persons responsible with implementing the wealth and interest declaration process.

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11th of April 2014

*For signature please refer to the
original Romanian version*

2. Objectives and scope of the project

According to the Contract, project'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 project;
2. Developing the verifications plan;
3. Performing the verifications plan;
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“;
- Conclude on the professional standards applicable to the engagement;
- Obtaining the necessary information for designing the assessment program and for the preliminary analysis of the risks identified in this phase.

On 3rd of February 2014, before the beginning of the fieldwork, we organized, at ANI's headquarter, 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 assessment. Based on the analysis of the documents made available to us, we developed the audit plan following the structure presented below:

- **Identifying the areas subject to verifications**, including the main activity directions of ANI (verifying the wealth, conflicts of interests 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 2013, in order to use these in the sampling process; based on this analysis, we drafted the testing strategy so that the processes under evaluation to be relevant for the scope of our project;
 - Asserting the format and content of the detail testing.

Please refer to Appendix 3A and Appendix 3B for a complete list of documents examined.

By the end of these two phases, on February 10th, 2014, we delivered the Initial Report to ANI management for approval, in which we made a presentation of the verification procedures applicable to each ANI structure, sampling methodology and project phases planning.

3.3. Performing the Audit Plan

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 fulfillment of management duties by ANI management, on the basis of the sample selected:
 - Verification of procedure 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 fulfills 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,
 - Operational 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 2013.

Our audit plan included specific compliance audit control 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 340/14.12.2010 (hereinafter “ROF”) and updated through ANI President Order no 86/04.03.2013 by comparing their provisions to Law no 144/2007, as well as with the provisions of 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 (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 organizational structure, the attributions, 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 176/2010, art 5 para 4.

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

- **Assessment 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 **assessment** 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 we 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.

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 checked were established based on audit trails and applicable internal manuals, according to the specific situation.

4. Reporting

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

5. Status of action measures implementation corresponding to ANI Strategy for control and prevention regarding accumulation of wealth, conflicts of interest and incompatibilities

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

Total measures	Implemented	Partially implemented	Not implemented
48	32	14	2

**Note: the above table does not contain the measures set with a fix implementation deadline in previous years and assessed as implemented during the external audits for the years 2011 and 2012.*

Please refer to Appendix 4 for a detailed analysis of the progress recorded by ANI in implementing these measures.

6. Remediation status for deficiencies identified during the audits for the years 2009, 2010, 2011 and 2012

Following the tests performed in order to assess the remediation status for the deficiencies identified during the audit missions for the years 2009, 2010 and 2011, which were not assessed as "implemented" as at December 31st, 2012, as well as the deficiencies identified during the audit performed for the year 2012 we prepared the below statistics on remediation status for deficiencies identified as at December 31st, 2013:

Directorate/ Department	Total deficiencies	Status			Recommendation not applicable ¹
		Implemented	Partially implemented	Not implemented	
Risk management process	2	1	1	-	-
Information Technology Directorate	12	3	5	3	1
Integrity Inspectorate	5	-	3	2	-
Internal Public Audit Department	3	2	1	-	-
Legal, Public Relations and Communication General Directorate	2	1	1	-	-
Human Resources Department	1	1	-	-	-
Economic Directorate	1	-	1	-	-
Communication, Public Relations and Strategy Directorate	1	-	-	1	-
Total	27	8	12	6	1

For details on the deficiencies corrected / partially corrected please refer to chapters IT system evaluation and Work methodologies specific to each verified area.

¹ Recommendation assessed as not applicable considering the improvements performed at ANI level

7. IT system evaluation

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

1. We audited the integrated Information System for the Management of Wealth and Interests Declarations (**SIMIDAI**) and its functionalities, 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 fulfill.
2. We audited the information system SAP related to the Agency's support activity area.

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 Directorate 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 conclusions drawn as result of ANI's IT system audit and are based on:

- Information and documentation made available by the employees of the Information Technology Directorate;
- Analysis of the daily activities performed by the IT Directorate;
- Visit and check of the servers' room at ANI location.

IT environment and management of IT systems security assessment

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

IT system assessment was comprised of the following steps:

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

Review of the IT general controls comprised of the identification of the potential risks which might adversely impact the functioning of the application, as well as the assessment of the control elements designed to mitigate these risks.

We reviewed 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 assessment 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.

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

The Agency implemented SIMIDAI system and Information Security Management System (SMSI) certified according to ISO 27001 Standard. Governed by the provisions of ISO/IEC 27001:2006 Standard, SMSI provides the management with better control over information flows within ANI and, also, provides a unified management of IT security issues through an active control of resources and is an useful tool to the Agency for control of the internal processes and, in general, of staff activities that interfere with or rely on the institution's IT infrastructure.

During 2013, the Agency finalized the SAP – ERP (Enterprise Resources Planning) application implementation process in order to ensure effectiveness of administrative activity, personnel accountability, use of resources adequate to Agency's scope and strategy and achieving objectives in the shortest time.

Within the process of making more efficient the overall Agency activity, on short term ANI extended the servers' storing capacity given that data volume is continuously growing.

Conclusion

ANI uses an integrated information system with a special design which allows for a strategic approach and a modern vision for the development and improvement of this institution's activity.

Thus, a key factor within ANI activity is the Integrated Information System for the Management of Wealth and Interests Declarations (**SIMIDAI**) which became more efficient and is successfully used by the integrity inspectors.

This IT system has had a major and positive impact that led to the efficiency of the Agency's management activity by automating certain processes within ANI and to ensure objectivity in the wealth and interests declarations analysis and evaluation process.

ANI finalized the implementation of SAP application, an integrated management solution for Agency's resources for the purpose of making more effective ANI's administrative activities. The system's objective is to improve the following areas: personnel accountability, use of resources adequate to Agency's scope and strategy, and achieving objectives in the shortest time.

Following the assessment of the operational procedures and based on the methodology applied the following **deficiencies** have been identified at the level of IT Directorate:

- Although at ANI level it was defined a procedure for application change process, following the analysis performed we noticed that:
 - the procedure does not include instructions regarding change criteria requests for classified confidential information;
 - the procedure does not provide the preparation of test plans approved by management. Thus, for the changes selected for assessment the test plans were not prepared and, also, the formal acceptance of test results was not available.
- During testing performed we noticed that, at ANI level, the responsibilities regarding data management for applications implemented were not formally assigned.

- Upon visiting the servers' room we noticed that environment control mechanisms have been implemented, such as: smoke / fire sensors, industrial air conditioning installation and reduced capacity air conditioning installation, anti-burglar system, climate unit system, UPS system, access control system, surveillance system. However, we noticed that in case the industrial air conditioning unit gets damaged, the second air conditioning unit has a too low cooling capacity and wouldn't sustain the request. Also, during the interviews held we understood that the equipment is not insured against various situations which might affect their integrity.
- The Agency uses FortiClient as anti-virus solution. The solution is configured to automatically update every two hours the viruses signatures, to save error logs and to scan in real time the work stations. However, we noticed that the programmed scanning of work stations is not set in the anti-virus console, and thus the work stations are not scanned periodically. The latest scan performed, as per the information made available, is dated January 2013.
- For applications' management, at Agency's level a series of users with administrator rights have been defined. However, following our analysis we could not identify a formally approved list with the persons who have been assigned administrator rights over the applications implemented within the Agency.
- During the testing performed, we noticed that, beside IT personnel, there are other employees with active access right in the servers' room.

In respect of the deficiencies identified during previous years' external audits of ANI management (2009, 2010 and 2011) and not solved at the time of the 2012 external audit, as well as the deficiencies identified during the 2012 external audit, 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 deficiencies:

- Server room equipment;
- In Active Directory the screen saver options (time-out policy configuration) is defined.
- At Active Directory level, the password policy has the settings of accounts enabled for lockout after a predefined number of failed attempts of introducing the password.

Additionally, we noticed that corrective measures have been **partially implemented** in respect of the following deficiencies:

- Implementation of a business continuity plan in case of disasters;
- Formalized process for the IT department to monitor the occurrence of security updates for the operating systems;
- User accounts still active after employees have terminated their contracts with the Agency;
- Contracts concluded with third parties (on providing maintenance and communication services) do not provide agreements over the quality level of the services.
- Star Storage employees in charge with the back-up process make tests of restoring the back-up tapes. Still, there is no formalization of those tests. Furthermore, the process is not conducted according to specific procedures.

Furthermore, we noticed that corrective measures have **not been implemented** in respect of the following deficiencies:

- No off-site location available for storing the backup files for work data and operational systems;
- Generic users accepted by management, with no formal documentation available in this respect;
- SAP password policy is not compliant with the logical access policy approved by the management;

In addition to the above, one of the deficiencies identified, namely implementation of a password policy at CIEL application level, is no longer applicable given the fact that ANI implemented SAP system.

8. Work methodologies specific to each verified area

Following the assessment of the activity performed during 2013, we noticed a positive evolution in the development of ANI managerial processes resulted from management efforts for improvement of processes and for the efficiency of the activity performed in order to achieve the planned objectives.

Furthermore, we noticed the fact that the highlights of ANI activity during 2013 are:

- Implementation of the document management application (DMS) which led to improvement of the managerial control system ensuring traceability of information flow at Agency's level and an increased degree of personnel's accountability within each structure;
- Implementation in production of SAP finance and accounting system – procurement, human resources, and accounting modules;
- Obtaining funding for “PREVENT – Integrated IT system for prevention of conflicts of interest in public procurement” project;
- Increase in the number of integrity inspectors and the support personnel for the Integrity Inspectorate.
- Implementation of SMIS code 34972, noted by implementation of electronic and intelligent DAI forms, intelligent data analysis module (visualink), OSINT search engine, external portal for persons responsible with implementing DAI, according to Law 176/2010, matrix reporting and internal portal.

Following the assessment of the operational procedures and based upon the methodology mentioned above the following deficiency has been identified at the Agency level:

- After examining the operational procedures implemented at the level of the Agency we found that they have not been updated to include the new operational flows following the implementation of SAP and DMS systems.

8.1. ANI Management

We have analyzed the responsibilities of ANI President and Vice-President as stated in the ANI Internal Organization Manual (hereinafter “ROF”), approved and updated by ANI President Order no 340/14.12.2010 and ANI President Order no86/04.03.2013.

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.

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

Management of the National Integrity Agency continued the line established by the institution's programmatic documents, strategy for combating and preventing unjustified wealth accumulation, conflicts of interest and incompatibility conditions (2011-2014) and Management Plan 2012 - 2015, focusing on developing IT tools for the personnel of the institution, improving case history, ensuring effective prosecution of cases investigated in order to obtain dissuasive results. The results and the Agency's efforts were appreciated in European Commission reports, be it those issued in the context of the Cooperation and Verification Mechanism, be it general assessment done in all EU Member States.

The greatest challenge for the future, the project started in the year 2013 refers to the instrument to prevent conflicts of interest. The Agency has developed and will implement the project based on the recommendations of the European Commission and with the support of other public institutions in Romania.

2. Vice-President

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

We organized interviews both with the President and Vice-President in order to assess the conformity of the practical activities with the ROF provisions. Following these interviews we did not identify any deficiencies regarding ANI's management. Furthermore, management activity has been improved through the implementation of majority recommendations included in the External Audit of the ANI Management for the years 2009, 2010, 2011 and 2012 Reports.

Following the interviews with ANI operational structures representatives, resulted that both the President and the Vice-President assumed and fulfilled their specific responsibilities stipulated in the legislation in force and in the ROF.

8.2. Integrity Inspectorate

During 2013, Integrity Inspectorate's activity was performed in accordance with the provisions of 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, 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 Inspectorate, we selected a sample based on the following audit procedure:

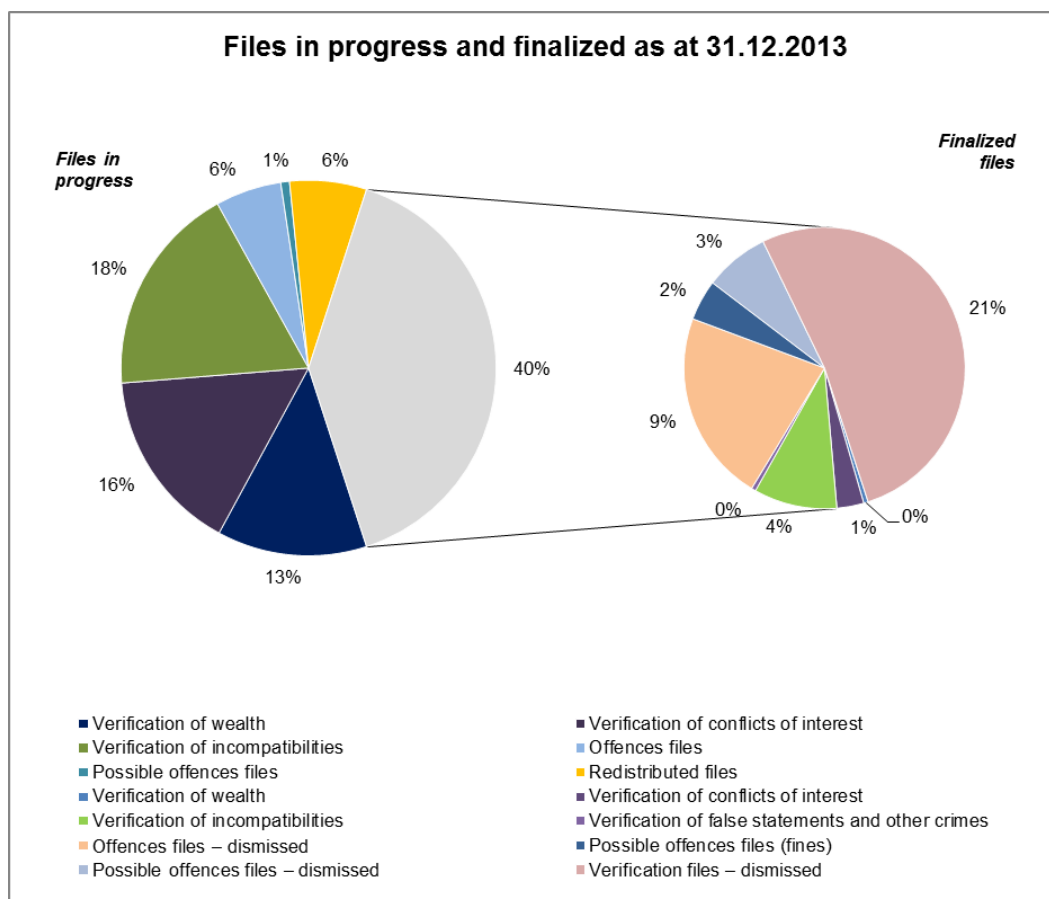
- a) We requested the statistics regarding the number of causes verified during 2013, on the following structure: files finalized and files in progress, files dismissed and files re-distributed as at December 31st, 2013. In respect of finalized files, we have requested their distribution considering the following sub-categories: causes regarding wealth, 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 wealth, conflicts 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 assessment procedures during 2013.
- 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 (146 unique files), as follows:

Causes closed by ANI during 2013 (January 1 st – December 31 st) ²		Sample size
Verification of wealth	17	5
Verification of conflicts of interest	104	7
Verification of incompatibilities	320	12
Verification of false statements and other crimes	17	5

² These data are based upon the statistics provided by the Integrity Inspectorate during the audit period.

Causes closed by ANI during 2013 (January 1 st – December 31 st) ²		Sample size
Offences files – dismissed	736	8
Possible offences files (fines)	156	5
Possible offences files – dismissed	249	8
Verification files – dismissed	1,746	9
Number of files in progress as at December 31 st , 2013		Sample size
Verification of wealth	1,082	20
Verification of conflicts of interest	1,322	18
Verification of incompatibilities	1,524	13
Offences files	476	10
Possible offences files	63	5
Redistributed files	555	25



The methodology for testing the sample was elaborated based on the understanding and assessment of operating procedures. We analyzed the content of the operating procedures to identify the activities within the Integrity Inspectorate 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 wealth, conflicts of interests and incompatibilities performed during 2013 by integrity inspectors.

Aspects regarding the activity of the Integrity Inspectorate

Aspects noted from the analysis of the sample of cases regarding the verification of wealth

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

- 39 cases derived from ANI ex officio notification, and
- 7 cases derived from a notification made by an individual or legal entity.

Aspects noted from the analysis of the sample of cases regarding the verification of conflicts of interests

Based on the sampling method described above we determined 31 cases regarding the verification of conflicts of interests out of which:

- 13 cases derived from ANI ex officio notification, and
- 18 cases derived from a notification made by an individual or legal entity.

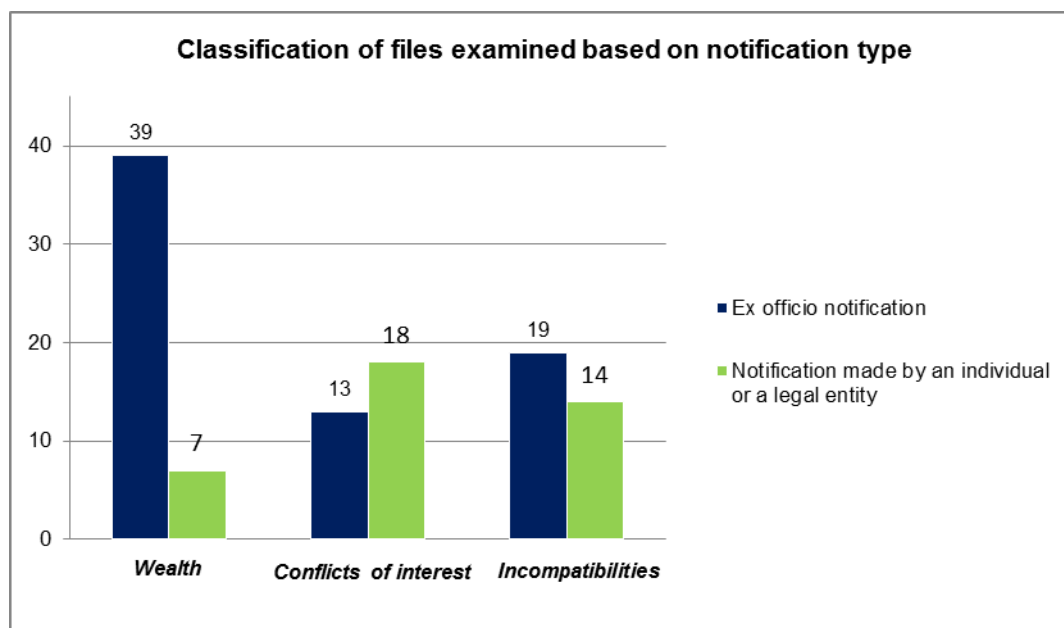
Aspects noted from the analysis of the sample of cases regarding the verification of incompatibilities

Based on the sampling method described above we determined 33 cases regarding the verification of incompatibilities out of which:

- 14 cases derived from ANI ex officio notification, and
- 19 cases derived from a notification made by an individual or legal entity.

Aspects noted from the analysis of the sample of cases regarding late submission of wealth and interest statements

Based on the sampling method described above we determined 37 cases regarding the verification of late submission of wealth and interest statements.



The activity of the Integrity Inspectorate is standardized and conducted based on the specific operational procedures elaborated in conformity with the OMFP no 946/2005 regulations regarding the managerial control.

Following the assessment of the operational procedures and based upon the methodology mentioned above the following **deficiencies** have been identified at the level of Integrity Inspectorate:

- Failure to prepare the document Minute on consultation of IT system database (5 cases of 146 files tested);

- Failure to submit the address to Court of Appeal – Administrative and Fiscal Legal Division, for the purpose of identifying if the verified person submitted an appeal regarding the Assessment report (2 cases of the 146 files tested);
- Failure to obtain a receive receipt regarding the address for submitting the Minute of Offence Ascertainment (3 cases of the 146 files tested);
- Failure to submit the notification to ANAF (National Fiscal Agency) with respect to the minutes of offence ascertainment issued and not-collected, for collection (1 case of 146 files tested).

In respect of the deficiencies identified during previous years' external audits of ANI management (2009, 2010 and 2011) and not solved at the time of the 2012 external audit, as well as the deficiencies identified during the 2012 external audit, we performed follow-up procedures in order to assess the degree in which these have been addressed / corrected.

Additionally, we noticed that corrective measures have been **partially implemented** in respect of the following deficiencies:

- SIMIDAI application so that it incorporates a dedicated field for the Declaration of Independence and impartiality to directly record the outcome of the Declaration, and according to the answer given by the inspector, the file either follows the normal work flow or is redistributed following the approval of the General Director of Integrity Inspectorate;
- SIMIDAI application is not improved by the implementation of a mandatory field where integrity inspectors note the prescription date or the period in scope.
- Failure to prepare and submit claims to courts for the purpose of 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.

Furthermore, we noticed that corrective measures have **not been implemented** in respect of the following deficiencies:

- Second request addresses were prepared and submitted to institutions who failed to respond to the initial addresses within the procedural term of 30 days;
- Files in which procedural documents have not been prepared for the purpose of preparing the evaluation report (where information existed within the file), or other addresses to request further information.

8.3. 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 operational procedures developed in accordance with the OMPF No. 946/2005 referring to management control.

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 annual internal public audit 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 audit mission "Investment activity audit";
- Performing the follow-up mission "Follow-up mission for the implementation of recommendations corresponding to the mission «Existence, functionality and effectiveness of internal controls in the activity related to verification of wealth and verification of conflicts of interest»";

➤ Assessment of the individual professional performances.

We mention that for this department the testing was not performed on a statistical sample basis because the activity performed during 2013 did not justify such a selection method. Thus, for each process we tested an operation from initiation to finalization.

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 assessment of the operational 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 previous years' external audits of ANI management (2009, 2010 and 2011) and not solved at the time of the 2012 external audit, as well as the deficiencies identified during the 2012 external audit, 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 deficiencies:

- Involvement of internal auditors in the process of implementing recommendations made during internal audit missions,
- Prioritization of recommendations included in the internal audit reports considering the impact of identified deficiencies, and performing the action of requesting from the audited structures the implementation status for recommendations included within internal audit reports at the deadlines set by audited structures with the Calendar for Implementation of the Recommendations.

Additionally, we noticed that corrective measures have been **partially implemented** in respect of the following deficiencies:

- Sustaining at least 15 days per year of professional development by internal auditors.

8.4. Legal, Public Relations and Communication General Directorate

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 ROF approved by Order of ANI President no 86/2013. Also, we performed detail testing on a sample of 25 files of the 433 files in progress in Courts and before the Appeal Courts Wealth Investigation Commissions as at December 31st, 2013, in order to analyze and verify the following procedural aspects:

- The manner in which the legal files are recorded and assigned;
- 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.

We organized an interview with DGJRPC Director to analyze the conformity of the department's activity in practice with the conditions stipulated in the ROF and to identify the areas which might be improved in order to increase efficiency of the activity performed in accordance with ANI's scope of establishing.

As to Validation and Legal Provisions Department – Disputed Claims Compartment's activity, we understood that within this department/compartment are employed six legal counsels whose main duties are: preparation of acts and representation of ANI in front of courts, analysis and preparation of replies within the legal timeline, to requests, claims and statements prepared on the basis of Law no 544/2001, with subsequent changes and additions, as well as on the basis of Law no 233/2002, submitted to the

Agency by individuals and legal entities, considering the afferent competencies, in relation to ANI activity, as well as providing legal support to the other structures within the Agency.

The activity of this structure is standardized and conducted based on the specific operational conditions elaborated in conformity with the OMFP no 946/2005 regulations regarding managerial control.

In respect of the deficiencies identified during previous years' external audits of ANI management (2009, 2010 and 2011) and not solved at the time of the 2012 external audit, as well as the deficiencies identified during the 2012 external audit, 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:

- Control Compartment activity.

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

- Computerized records of causes in courts.

There are no computerized records of causes in courts; however, the Agency started the implementation process of the reporting module for Legal General Directorate, having the following functionalities:

- Efficient monitoring of causes/files managed by Legal General Directorate;
- Generation of complex statuses and reports, in real time, within certain preset criteria;
- Optimization of managerial control over the causes/files in progress at the level of DGJRPC.

Communication, Public Relations and Strategy Directorate

The activity of this structure is standardized and conducted based on the specific operational conditions elaborated in conformity with the OMFP no 946/2005 regulations regarding managerial control.

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 analysis was focused on the conformity of the operating procedures valid during 2013 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 Ministry of Justice on the status of implementation of the measures belonging to ANI for the fulfillment of MCV (Cooperation and Verification Mechanism) Benchmarks;
- Implementing the action plan measures for implementing ANI Strategy on combating and prevention of unjustified wealth, conflicts of interest and incompatibility.

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.

In respect of the deficiencies identified during previous years' external audits of ANI management (2009, 2010 and 2011) and not solved at the time of the 2012 external audit, as well as the deficiencies identified during the 2012 external audit, 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 **not been implemented** in respect of the following deficiency:

- Failure to reply to request for public information within the timeframe of maximum 30 days of registering the request.

8.5. 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 2013 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 946/2005 regulations regarding managerial control.

We organized a number of interviews with the SRU 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 wealth and interests declarations 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 2013 and evaluation of training activities;
- Confirming the permanent positions for debutant personnel during 2013;
- Evaluating the performance of ANI personnel;
- Preparation of the work chart of public functions plan for the year 2013;
- Promotion operational procedure;
- Procedure for terminating work relations;
- Monitoring the compliance of ANI personnel with the conduct norms;
- Activity of the Disciplinary Commission at ANI level;
- Activity of Ethics Counselor.

We mention that for this department we used two (2) 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 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 SRU activity during 2013, 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, and we noted that there are distinct responsibilities for the coordinators of the structures, which leads to an improvement of managerial control function.

Based on the methodology applied and following the assessment of the operational procedures, the following deficiencies were identified regarding the activity performed at the level of Human Resources Department:

- Incomplete Quarterly Report regarding compliance with the code of conduct;
- Conflict of interest declarations by the evaluation committee for hiring new integrity inspectors (higher professional degree and assistant) left incomplete with regards to declaring any existence of conflicts of interests; documentation relating to the hiring process (higher professional degree) was not signed and dated;

- Non-quantifiable performance indicators and no deadlines in the assessment of ANI employees;
- The annual plan with minimum activities related to business ethics advisory details these activities but does not propose deadlines for their completion or steps for monitoring them.

In respect of the deficiencies identified during previous years' external audits of ANI management (2009, 2010 and 2011) and not solved at the time of the 2012 external audit, as well as the deficiencies identified during the 2012 external audit, 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:

- Ethics Counselor activities (participation at professional training courses in the field, annual minimal plan of activities, organization of study meetings/ seminars/ workgroups on ethics with ANI employees, etc.).

Labor Protection Compartment

We assessed the compliance of the operating procedures valid during 2013 with the ROF provisions and the applicable legislation and we organized an interview with the representative of the Labor Protection Compartment (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 946/2005 regulations regarding the managerial control.

8.6. Economic Directorate

We assessed the compliance of the operating procedures valid during 2013 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 946/2005 regulations regarding managerial control.

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 2013;
- Procedure for drafting the expenses budget;
- Carrying out the investment project for the year 2013;
- Procedure of engaging, liquidation, ordering and payment of the expenses;
- Internal preventive financial control;
- Cash Register;
- Monitoring the expenses of personnel;
- Asset count.

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.

Investments and Public Acquisition Compartment – CIAP

We have analyzed the responsibilities of the Investments and Public Acquisitions Compartment (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 2013 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 acquisitions started in 2013. Following the analysis of this status we noted the fact that during 2013 there were purchased goods, services and assignments through the processes of request for offer, open bid and direct acquisition. We performed detail tests over a sample of goods, services and works purchased through direct acquisition, as well as over the acquisition procedure for ANI administrative support IT system management and maintenance services.

To this effect, we determined the sample size for the detailed tests (25 purchases), relating to the total number of public acquisitions purchased in 2013 through the process of direct acquisition. Also, we stratified the population so that the sample would include different types of goods and services and works purchased through direct acquisition.

The assessment of the purchases included in the sample aimed the conformity of the activities performed with the operational procedure for direct acquisition, valid during 2013.

Archiving procedure

We assessed the conformity of operating procedures valid during 2013 with the ROF provisions and the applicable legislation.

During 2013, the Archiving Compartment was not functional, due to the fact that the vacant position of archivist was not filled since June 2010.

Following the assessment of the operational procedures and based upon the methodology mentioned above the following **deficiencies** have been identified at the level of Economic Directorate:

- SAP system does not allow printing of "Expenses engaging" document in a format that allows the inclusion of the Agency's identification elements;
- At SAP system level, in case of services acquisitions, it is not mandatory the existence of a link between the recorded invoice and corresponding purchase request;
- Payrolls and timesheets generated from SAP system do not reconcile in respect of ANI employees vacation days.

In respect of the deficiencies identified during previous years' external audits of ANI management (2009, 2010 and 2011) and not solved at the time of the 2012 external audit, as well as the deficiencies identified during the 2012 external audit, 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 **partially implemented** in respect of the following deficiency:

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

8.7. Risk management process at ANI level

To ensure compliance with Standard 11 of the OMFP (Ordinul Ministrului Finantelor Publice - Minister of Public Finances Order) no 946 / 2005, in June 2010, at ANI level, a permanent Commission has 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.

Additionally, by ANI President Order no 436/18.10.2012 it has been established the structure with responsibilities for monitoring, coordinating and methodological guidance of the managerial control system – SCM Committee – updated by ANI President Order no 155/15.04.2013.

Also, ANI 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.

Also, we noted that, at ANI level, a System Procedure named “Risk Management” containing provisions regarding:

- Implementation and development of implementation for Standard 11 of OMFP 946/2005 on managerial control standards;
- Risk management process at ANI level;
- Setting and implementation of control actions/measures/devices.

In assessing the adequacy and effectiveness of the risk management process at ANI level, we assessed the following aspects through the actions taken during 2013:

- Unique Risk Register prepared 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.

Following the assessment of the operational procedures and based upon the methodology mentioned above the following **deficiency** has been identified:

- The Risk Register does not include all ANI processes and structures/units.

In respect of the deficiencies identified during previous years’ external audits of ANI management (2009, 2010 and 2011) and not solved at the time of the 2012 external audit, as well as the deficiencies identified during the 2012 external audit, 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 deficiencies:

- The system procedure “Risk Management” has been updated by defining inherent risk, update of provisions regarding attitude towards risk (the possibility of “eliminating” it), and updating the performance indicators associated to the procedure.

Additionally, we noticed that corrective measures have been **partially implemented** in respect of the following deficiencies:

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

9. 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 31st, 2013.

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 sources³. 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 2013 and does not extend over ANI's financial statements.

³ For example the European Commission Report regarding the Benchmarks implementation status, mass-media monitoring etc.

APPENDIX 1 List of interviewed persons

Activity	ANI representative	Current position / Department
Interview on ANI management	Horia GEORGESCU	President
Interview on ANI management	Bogdan STAN	Vice-President
Interview on DGJRPC activity	Ioana LAZĂR	General Director – Legal, Public Relations and Communications General Directorate
Interview on DCRPS activity	Silviu POPA	Director – Communications, Public Relations and Strategy Directorate
Interview on STI activity	Cristinela Grosu	Head of Department – Information Technology Directorate
Interview on SRU activity	Veronica GHIBA	Head of Department – Human Resources Department
Interview on CAPI activity	Anne Marie ONCESCU	Senior auditor – Internal Public Audit Department
Interview on Administrative Department activity	George Viorel GRECEANU ANGHEL ACASANDRI	Head of Department – Administrative Department
Interview on CPM activity	Venera BUTNĂRESCU	Representative – Labor Protection Compartment
Interview on CIAP activity	Gabriel PANAIT	Senior Consultant – CIAP
Interview on DE activity	Greta CONSTANTINESCU	Director – Economic Directorate
Interview on Integrity Inspectorate activity	Elena GALAN	General Director – Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Magdalena MIHAILĂ	Director – Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Mihai POPESCU	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Romică DINICĂ	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Puița BECUȚ	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Mihaela IONESCU	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Alina TÂRNĂ	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Anca TOMULESCU	Head of Department, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Ana-Luiza DOMNIȚIANU	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Georgian MANOLACHE	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects	Romeo CRISTEA	Integrity Inspector, Integrity

regarding the integrity inspection files		Inspectorate
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APPENDIX 1 List of interviewed persons (continuance)

Activity	ANI representative	Current position / Department
Interview to clear up some aspects regarding the integrity inspection files	Daniela MINCU	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Delia BĂLTĂREȚU	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Miuța Mirela ȚURLACU	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Andrei CHIOCHIU	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Mihai FENTZEL	Head of Department, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Ioana – Alina GULEȘ – STANCIU	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Mihaela RĂDESCU	Head of Department, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Ana Luisa BADIU	Head of Department, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Daniela MITUȚOIU	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Andra Lavinia CÎMPEANU	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Georgiana DUMITRAȘCU	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Ionuț PÂNDARU	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Anamaria ANGHELESCU	Head of Department, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Andrada BOCA	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Alexandru POPA	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Tudor MITROIU	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Florin MOISE	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Maria CRETU	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Alina AILENEI	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Catalin GULES STANCIU	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects regarding the integrity inspection files	Roxana GRUBER	Integrity Inspector, Integrity Inspectorate
Interview to clear up some aspects	Anca OPREA	Superior Counselor, Economic

regarding payroll preparation		Directorate
Interview to clear up some aspects regarding ethic counseling	Mihaela PETRE	Ethics Counselor, Human Resources Department

APPENDIX 2 List of procedures analyzed

Operational procedure	Date
Integrity Inspectorate	
PO 01/II – Activity of checking the statements of wealth and conflicts of interests received from ANI Registry	29.04.2008 05.10.2010 25.10.2012
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 statement of wealth, 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 statements of wealth and conflicts of interests; VI. Not applying disciplinary sanctions or not contesting suspension of public function, as appropriate, when the evaluation report remains final	06.05.2009 01.10.2010 25.10.2012
PO 03/II – Activity of evaluation of statements of wealth, of data and information regarding existing wealth, as well as of patrimonial changes appeared existing in the exercise of public functions or dignity	21.05.2009 05.08.2010 25.10.2012
PO 04/II – Evaluation of compliance with legal provisions regarding conflicts of interest in the exercise of public functions or dignity	27.05.2009 01.10.2010 25.10.2012
PO 05/II – Checking compliance with legal provisions regarding incompatibility regime in the exercise of mandates or public functions or dignity	10.06.2009 05.08.2010 25.10.2012
PO 06/II – How to fill in the statements of wealth and interests	12.06.2009 07.10.2010 25.10.2012
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	21.12.2009 30.09.2010 25.10.2012
PO 08/II – Execution of extrajudicial expertise I. Execution of extrajudicial expertise with the agreement of the person whose wealth is subject to evaluation; II. Execution of extrajudicial expertise in case the person whose wealth is subject to evaluation does not agree with the execution of the expertise	01.10.2010 25.10.2012
PO 09/II – Taking action in ascertain absolute nullity of legal or administrative acts concluded infringing legal obligations regarding conflict of interests by the person subject to evaluation	22.12.2009 08.10.2010 25.10.2012
PO 10/II – The documents flow between Integrity Inspectorate and Legal, Control and Public Relations Directorate	05.10.2010 25.10.2012
PO 11/II – Random distribution of causes in conformity with article 9 paragraph 1 of Law no 176/2010	22.12.2009 01.10.2010 25.10.2012

APPENDIX 2 List of analyzed procedures (continuance)

Operational procedure	Date
Human Resources Department	
PO 01/SRU – Evaluation of public servants individual professional performance	07.04.2009 25.10.2012
PO 02/SRU – Appointment in a vacant public function	05.05.2009 25.10.2012
PO 03/SRU – Preparing and maintaining the record for contractual employees	25.10.2012
PO 04/SRU – Organization of the contest for occupying the integrity inspector function	01.04.2009 25.10.2012
PO 05/SRU – Organization of the contest for occupying a contractual position within ANI	25.10.2012
PO 06/SRU – Confirmation on the job of debutant	05.05.2009 25.10.2012
PO 07/SRU – Scheduling and attribution of vacations for ANI personnel	20.05.2009 25.10.2012
PO 08/SRU – Delegation of work tasks within ANI	17.05.2009 25.10.2012
PO 09/SRU – Drafting, approval and submission of collective timesheets	25.09.2009 25.10.2012
PO 10/SRU – Communication of ANI Internal Regulation to employees	21.12.2009 25.10.2012
PO 11/SRU – Promotion of public servants	07.10.2010 25.10.2012
PO 12/SRU – Drafting the Annual Plan of Professional Training and of the plan of measures for professional development of ANI personnel	07.10.2010 25.10.2012
PO 13/SRU – Registering and recording of medical certificates within ANI	18.10.2010 25.10.2012
PO 14/SRU – Drafting and approval of ANI functions list	19.10.2010 25.10.2012
PO 15/SRU – Drafting and maintenance of public servant professional file	20.10.2010 25.10.2012
PO 16/SRU – Fulfilling the legal obligations regarding statements of wealth and conflicts of interests by ANI personnel	25.10.2010 25.10.2012
PO 17/SRU – Drafting and updating job descriptions	26.10.2010 25.10.2012
PO 18/SRU – Approval of overtime for ANI personnel	28.10.2010 25.10.2012
PO 19/SRU – Termination of workplace relations	09.11.2010 25.10.2012

APPENDIX 2 List of analyzed procedures (continuance)

Operational procedure	Date
Human Resources Department	
PO 20/SRU – Evaluation of contractual personnel's professional performances	25.10.2012
PO 21/SRU – Plan for occupancy of public functions	25.10.2012 26.02.2013
PO 22/SRU – Monitoring compliance with conduct norms of public servants within ANI	25.10.2012 27.03.2013
PO 23/SRU – Granting salaries to ANI personnel	25.10.2012
PO 24/SRU – Organizing and development of competition/exam for recruiting execution public function within ANI	25.10.2012
PO 25/SRU – Redistribution of public servants, organizing and conducting professional testing within ANI	28.02.2013
PO 26/SRU – Preparation, update and submission of public servants evidence register	2013
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	2013
PO 28/SRU – Preparation and modification of ANI's ROF	2013
PO 29/SRU – Organizing and conducting the contest / exam for recruiting/promotion for public management functions within ANI	28.02.2013
PO 30/SRU – Preparation and management of personnel file	20.02.2013
Labor Protection Compartment	
PO 01/CPM – Activity of training regarding the domain safety and health at work	05.08.2010 06.03.2012
PO 02/CPM – Introductory – general training in safety and health at work	17.03.2009 06.03.2012
PO 03/CPM – Training activity on safety and health at work	26.03.2009 06.03.2012
PO 04/CPM – Periodical training in safety and health at work	05.05.2009 06.03.2012
PO 05/CPM – Collective training in safety and health at work for outside workers performing on a contract basis for the provision of services within ANI	11.05.2009 06.03.2012
PO 06/CPM – Activity for preparing own instruction in safety and health at work	12.12.2011 06.03.2012
PO 07/CPM – Activity of examination, recording and records keeping of work accidents and occupational diseases	12.12.2011 06.03.2012
PO 08/CPM – Risk assessment	12.12.2011 06.03.2012
PO 09/CPM – Preparing the Prevention and Protection Plan	12.12.2011 06.03.2012
PO 10/CPM – Activity of drafting the list with protection equipment of employees	12.12.2011 06.03.2012
Administrative Compartment	
PO 01/SA – Elaboration, preparation, verification and calculation of the millage sheets	22.04.2009

Operational procedure	Date
	04.10.2010 25.10.2012
PO 02/SA – Testing vehicle technical and exploitation state before leaving on a course	22.05.2009 04.10.2010 25.10.2012
PO 03/SA – Organizing, planning and performing the vehicles technical maintenance services	20.05.2009 04.10.2010 25.10.2012

APPENDIX 2 List of analyzed procedures (continuance)

Operational procedure	Date
Administrative Compartment	
PO 04/SA – Ensuring the daily cleaning of ANI headquarters and additional buildings	04.10.2010 25.10.2012
PO 05/SA – Ensuring the daily cleaning of ANI headquarters and additional buildings through selective waste collection	04.10.2010 25.10.2012
PO 06/SA – Preparation of goods receiving note	04.03.2011 25.10.2012
PO 07/SA – Preparation of supply/ material record	04.03.2011 25.10.2012
PO 08/SA – Preparation of supply/ material consumption form	04.03.2011 25.10.2012 2013
President / Vice-President Cabinet	
PO 01/CP – Flow of authorization and approval of the documents and internal and external correspondence in/out ANI	25.03.2009 05.08.2010 30.10.2012
PO 02/CP – Issuing orders	30.03.2009 05.08.2010 30.10.2012
PO 03/CP – Recording and archiving documents at President Cabinet	08.04.2009 05.08.2010 30.10.2012
PO 04/CP – Communication of orders, dispositions, answers and resolutions issued by the President to ANI management	10.04.2010 05.08.2010 30.10.2012
PO 05/CP – Making appointments to dignitaries cabinets	26.02.2009 05.08.2010 30.10.2012
PO 06/CP – Keeping records of the working hours for personnel from dignitaries Cabinets	04.05.2009 05.08.2010 30.10.2012
Information Technology Directorate	
PS 02 – Documents' control	19.03.2013
PS 03 – Records' control	19.03.2013
PS 04 – Internal audit	19.03.2013
PS 05 – Non-conformities, corrective and preventive actions	19.03.2013
PO 01/SI – Information security risks management	19.03.2013
PO 02/SI – Incidents management	19.03.2013
PO 03/SI – Information resources management	19.03.2013
PO 04/SI – Changes management	19.03.2013
POL 01/SI – IT Security Management System Policy	2012

Operational procedure	Date
POL 02/SI – Activity Continuity Management Policy	2012
POL 06/SI – Physical Security Policy	2012

APPENDIX 2 List of analyzed procedures (continuance)

Operational procedure	Date
Internal Public Audit Department	
PO 01/CAPI – Internal public audit annual plan	10.03.2009 10.06.2010 25.10.2012
PO 02/CAPI – Preparation of the Annual report of Internal Public Audit activity	25.03.2009 25.10.2012
PO 03/CAPI – Human resources management within CAPI	13.03.2009 25.10.2012
PO 04/CAPI – Performance of internal public audit missions based on the Internal public audit annual plan	25.03.2009 25.10.2012
PO 05/CAPI – Prepare internal public audit missions	25.03.2009 25.10.2012
PO 05.1/CAPI – Order of work preparation and circulation	16.03.2009 25.10.2012
PO 05.2/CAPI – Auditor's independence statement	27.03.2009 25.10.2012
PO 05.3/CAPI – Notification of audited structure on the start of audit mission	25.10.2012
PO 05.4/CAPI – Opening/Kick-off meeting for audit missions	25.10.2012
PO 06.1/CAPI – Conducting of the "intervention of auditors on site" stage	26.02.2009 25.10.2012
PO 06.2/CAPI – Preparation and circulation of Opening meeting minute	25.10.2012
PO 07/CAPI – Audit mission report preparation	31.03.2009 25.10.2012
PO 08/CAPI – Follow up on the implementation of recommendations from previous missions reports	17.03.2008 25.10.2012
PO 09/CAPI – Supervision of audit missions	18.03.2008 25.06.2010 25.10.2012
PO 10/CAPI – Personnel evaluation	27.05.2008 20.09.2010 25.10.2012
PO 11/CAPI – Quarterly reporting to UCASMFC on implementation and development of managerial control systems	25.03.2009 05.07.2010 25.10.2012
PO 12/CAPI – Internal auditors national attestation process	25.10.2012
PO 13/CAPI – Performing consulting missions	25.10.2012
PO 14/CAPI – Preparation and update of "Incident legislation on auditable domains" Registry	25.10.2012

APPENDIX 2 List of analyzed procedures (continuance)

Operational procedure	Date
Managerial Control System Joint Committee	
PS1/CC/SCM – Risk management	20.07.2012 10.06.2013
PS2/CC/SCM – Functioning of the Committee for monitoring, coordination and methodological guidance in development of ANI Managerial Control System	01.10.2013
PS03/CC/SCM – Preparation of Operational Procedures specific to the activities performed within ANI	2012 02.10.2013
PO 04/CC/SCM – Preparation of Scorecard – basis of discussions scheduled at the Cabinet of the President and Vice-President	2012 02.10.2013
Legal, Public Relations and Communication General Directorate	
PO 01/DGJRPC – Drafting the documents and ANI representation before courts	26.03.2010 28.11.2012
PO 02/DGJRPC – Procedure regarding the approval of ANI contracts	26.03.2010 11.12.2012
PO 03/DGJRPC – Procedure regarding the approval of ANI internal documents	26.03.2010 28.11.2012
PO 04/DGJRPC – Procedure ways and conditions to keep, record and archive DJCRP documents (started/prepared by)	26.03.2010 28.11.2012
PO 05/DGJRPC – Security of personnel from public authorities, institutions and others who whistle blow law infringements	30.03.2009 28.10.2010 28.11.2012
PO 06/DGJRPC – Procedure on identifying by the control compartment of ANI personnel's deviations from legality, deficiencies and wrong-doings	30.03.2009 09.08.2011 28.11.2012
PO 07/DGJRPC – Monitoring, analysis and dissemination of subject matter jurisprudence, specific to ANI activity	28.11.2012
Communication, Public Relations and Strategy Directorate	
PO 01/DCRPS – Drafting the answers to the requests made based on Law 544/2001	31.03.2009 06.10.2010 25.10.2012
PO 02/DCRPS – Drafting media materials	04.05.2009 06.10.2010 25.10.2012
PO 03/DCRPS – Performance of media monitoring activities	04.05.2009 08.06.2010 25.10.2012
PO 04/DCRPS – Organization of protocol events (welcomes, receptions, formal and work dining, gifts) at Agency management level	04.05.2009 06.10.2010 25.10.2012
PO 05/DCRPS – Organization of domestic and international travels of ANI representatives	04.05.2009 25.10.2012
PO 06/DCRPS – Status of measures implementation in ANI's responsibility for implementation of benchmark within Cooperation and Verification Mechanism	11.05.2009 06.10.2010 25.10.2012

Operational procedure	Date
PO 07/DCRPS – Drafting ANI communication strategy	06.10.2010 25.10.2012

APPENDIX 2 List of analyzed procedures (continuance)

Operational procedure	Date
Economic Directorate	
PO 01/DE – Activity of preventive financial control	21.09.2009 25.01.2010 30.12.2011
PO 01/ANI – Inventory of assets and liabilities	05.04.2009 31.10.2010 02.07.2012
PO 01/S/DE – Receipt and allocation of correspondence in DE	12.07.2011
PO 01/F/DE – Justification and approval of Annual Public Investments Program ⁴	08.10.2010 25.05.2012 09.12.2013
PO 01/C/DE – Accounting records of fixed assets and depreciation	08.10.2010 03.09.2012
PO 02/F/DE – Justification of monthly credit needs in order to request the opening of budgetary credits ⁵	07.10.2010 20.09.2012 01.11.2013
PO 02/C/DE – Accounting records of consumptions of materials	08.10.2010 03.09.2012
PO 03/F/DE – Processing the credit transfers within approved expenses budget ⁵	12.10.2010 17.05.2012 29.11.2013
PO 04/C/DE – Accounting records of material collaterals constituted under the law ⁵	08.10.2010 03.09.2012 09.12.2013
PO 04/F/DE – Start of investments financing approved through the expenses budget of the Agency ⁵	12.10.2010 29.12.2012 29.11.2013
PO 05/F/DE – Activity of preparation and justification of the budgeted expenses of the Agency ⁵	09.12.2010 19.03.2012 01.11.2013
PO 06/C/DE – Accounting records of salary expenses on the budgetary classification structure ⁵	01.09.2010 03.09.2012 11.12.2013
PO 06.1/F/DE – Activity of expenses commitment	23.04.2009 16.05.2012
PO 06.2/F/DE – Activity of expenses clearance	04.05.2009 15.07.2011 16.05.2012
PO 06.3/F /DE – Activity of expenses authorization	06.05.2009 16.05.2012
PO 06.4/F/DE – Activity of expenses payment	13.05.2009 16.05.2012

⁴ Updated procedure pending ANI management approval

Operational procedure	Date
PO 06.5/F/DE – Organization, recording and reporting of budgetary appropriations, legal appropriations, approved commitment appropriations and employed commitment appropriations	03.06.2009 17.06.2010 21.05.2012
PO 07/C/DE – 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 ⁵	01.09.2010 03.09.2012 17.12.2013

APPENDIX 2 List of analyzed procedures (continuance)

Operational procedure	Date
Economic Directorate	
PO 7.1/F/DE – Preparing the payroll for the salaries and other personnel benefits ⁵	29.09.2010 21.07.2011 18.12.2013
PO 08/F/DE – Monitoring and storage of Contract original copy and follow up on the development of the contract terms	29.04.2009 20.06.2012
PO 08.1/C/DE – Keeping the record of the expenses related to international travel, on the budgetary classification structure ⁵	01.09.2010 03.09.2012 11.12.2013
PO 08.2/C/DE – Keeping the record of the documents related to the cash collections and payments in “lei” ⁵	07.10.2010 03.09.2012 11.12.2013
PO 09.1/F/DE – Performing the Cash operation in “lei”	26.05.2009 21.06.2010 12.01.2011
PO 09.2/F/DE – Performing the Cash operations in foreign currency	26.05.2009 01.06.2010 20.06.2012
PO 10/C/DE – The monthly, quarterly and annually activity of editing the general ledger, account details and synthetically and analytical balance sheet, using SAP system ⁵	08.10.2010 03.09.2012 11.12.2013
PO 10.1/F/DE – Filling in and verification of the “lei” Cash Registry	18.05.2009 24.06.2010 20.06.2012
PO 10.2/F/DE – Filling in and verification of the foreign currency Cash Registry	18.05.2009 09.08.2010 20.06.2012
PO 11/F/DE – 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	29.04.2009 20.09.2012
PO 11.1/C/DE – Quantitative-monetary record of material inventories ⁵	29.04.2009 17.06.2010 19.03.2012 18.12.2013
PO 11.2/C/DE – Tangible and intangible assets, as well as work in progress, record in SAP integrated IT system – AA Module ⁵	01.09.2010 17.09.2012 18.12.2013
PO 11.3/C/DE – Small inventory items in use record within SAP integrated IT system – AA Module ⁵	13.10.2010 22.02.2012 18.12.2013
PO 11.4/C/DE – Preparing the Inventory Numbers Registry (cod: 14-2-1) ⁵	12.10.2010 22.02.2012 18.12.2013
PO 11.5/C/DE – Decommissioning and discarding of the fixed assets and inventory items in use	07.10.2010 22.02.2012
PO 12/C/DE – Preparing, signing, submitting, composition, and instructions on filling in ANI quarterly and annual financial statements	02.09.2010 01.09.2012

Operational procedure	Date
PO 12/F/DE – Preparing the payment sheets and submitting them to the State Treasury	14.05.2009 20.09.2012
PO 13/F/DE – Obtaining the account statements from the State Treasury and Credit Europe Bank	25.08.2009 27.09.2012

APPENDIX 2 List of analyzed procedures (continuance)

Operational procedure	Date
Economic Directorate	
PO 14/C/DE – Agency patrimony annual inventory organization, valuation of inventory results and recording them in the annual financial statements	30.10.2009
PO 15/C/DE – Preparing the Inventory Registry	30.03.2009
PO 16.1/F/DE – Preparing the Situation regarding monitoring of personnel expenses in the month ... year ...	25.03.2009 02.07.2012
PO 16.2/F/DE – Quarterly monitoring of the personnel expenses	27.03.2009 02.07.2012
PO 16.3/F/DE – Preparation and submission of the Declaration regarding the payment obligations to the state budget, code 14.13.01.99/bs and D100	05.08.2010 29.10.2012
PO 16.5/F/DE – Preparation and submission to the Treasury of the Planned Payments Status for the decade ... month ... / year ...	17.08.2010 22.02.2012
PO 16.10/F/DE - Preparation and submission of the Statement on payment obligations of the social contributions, income tax and individual evidence of insured persons ⁵	07.07.2011 18.12.2013
PO 17/F/DE – Checking the domestic and international travel expenses	04.10.2010 28.02.2012
PO 18/F/DE – Archiving and storage of financial – accounting registries and documents	20.12.2010 17.05.2012
Investments and Public Acquisition Compartment	
PO 01/CIAP – Procurement through the “request for offer” procedure of goods / services / works	21.05.2009 05.10.2010 25.10.2012
PO 02/CIAP – Monitoring the execution of a public acquisition contract in respect of the technical specifications	06.05.2009 05.10.2010 25.10.2012
PO 03/CIAP – Invoice flow	22.06.2009 25.10.2012
PO 04/CIAP – Procurement through direct acquisition of goods / services / works	12.01.2010 25.10.2012
PO 05/CIAP – Elaboration and update of the Public Acquisition Annual Program	30.07.2010 05.10.2010 25.10.2012
PO 06/CIAP – Procurement through “open bidding” procedure of goods / services / works	05.10.2010 25.10.2012
PO 07/SIAP – Preparation of tender documentation within the public acquisition procedures	26.10.2010 25.10.2012

APPENDIX 2 List of analyzed procedures (continuance)

Operational procedure	Date
General Registry	
PO 01/RG – Receiving, sorting, checking and distribution of mail from Romanian Post and Courier within ANI	19.12.2011
PO 02/RG – Preparation and delivery of correspondence	19.12.2011 25.10.2012
PO 03/RG – Circulation of petitions at ANI level	19.12.2011 25.10.2012
PO 04/RG – Circulation and record of requested correspondence during Integrity Inspection evaluations	19.12.2011 25.10.2012
PO 05/RG – Processing Wealth and Interest Declarations	19.12.2011 25.10.2012

APPENDIX 3A List of documents analyzed during audit

No	Name of document
1	ANI Internal Organization Manual 2013
2	ANI Internal Regulation applied in the period 1 January 2013 – 31 December 2013 and the Internal Order of approval
3	Implementation status for previous year recommendations
4	Detailed rules and methodology regarding internal public audit activity within ANI
5	Internal Audit Plan with supporting documents for 2013, Memo Order submission and Approval Order, including later versions
6	Supporting documents for CAPI's activity plan for 2013
7	Assurance program and quality improvement of the internal audit activity in 2013 and Forwarding Address
8	Auditors evaluation (for the 2013 activity) and Forwarding Address
9	Annual report on internal public audit during 2013
10	Public functions employment plan for 2013, including the internal memo on its preparation and forwarding address to ANFP
11	List of ANI contracted personnel
12	Situation of debutants in 2013 and of hired debutants in 2013
13	Register of public servants
14	List of contests organized by ANI during 2013
15	List of employment contracts terminated in 2013
16	List of ANI personal who attended training / professional development seminars in 2013
17	Addresses and notes of participation in training courses
18	Staff training strategy for 2013
19	Staff training and professional development plan in 20123
20	Order of ANI President for assigning the employee responsible to complying with legal provisions on wealth and conflicts of interest statements within ANI
21	The Code of Ethical and Professional Conduct of ANI personnel
22	Quarterly reports on staff compliance with the code of conduct in 2013
23	List of ANI personnel acknowledgement of ANI Internal Regulations
24	Documentation for 2013 from the Disciplinary Committee of ANI
25	Prevention and protection plan drawn up in 2012 in accordance with safety and health law no 319/2006 and GD 1425/2006
26	Internal rules for labor safety and health
27	List of files under DGJRPC

APPENDIX 3A List of documents analyzed during audit (continuance)

No	Name of document
28	Annual internal public audit plan for 2013, as well as the updates made during the year
29	List of acquisitions made in 2013
30	Report with initiated and contracted public acquisitions
31	List of investment in 2013
32	Order of ANI President regarding the hiring, liquidation, approval and payment of budgetary expenses
33	Addresses to the Ministry of Finance regarding human resources databases in 2013
34	List for the position "Other investment expenses" with investment objectives having partial or full funding from state budget
35	Reports and statements regarding the monitoring of staff costs for September 2013
36	Report regarding the preventive financial control for the third trimester
37	Financial Statements at 31.12.2013
38	Order regarding the hiring, liquidation, approval and payment of budgetary expenses (in 2013)
39	ANI budget for 2013 and rectifications
40	Notes regarding the rectification of budget 2013
41	Payment reports 01.01-31.12.2013
42	Inventory order in 2013
43	Order of appointing the inventory committee
44	Instruction regarding the general patrimony inventory of ANI
45	Minutes of patrimony inventory of ANI in 2013
46	List of files finalized and in progress at 31.12.2013 at Integrity Inspectorate level on classified for each object verified
47	List of vacations taken during 2013
48	Management plan for 2013
49	Action plan for ANI personnel training strategy for 2013
50	Registry for recording requests and answers regarding access to public interest information during 2013
51	ANI Communication strategy
52	Supporting documentation regarding the timesheets included in testing
53	Files of contests included in testing
54	Supporting documentation regarding labor contracts terminated during the period in scope
55	Supporting documentation regarding training and professional development included in testing
56	Supporting documentation for the contractual personnel documentation selected for testing

APPENDIX 3A List of documents analyzed during audit (continuance)

No	Name of document
57	Professional files of civil servants selected for testing
58	Reports for press monitoring as per selection for testing
59	Documentation of the audit mission "Audit of investment activity"
60	Documentation of the follow-up on recommendation implementation for the audit mission "Existence, functionality and effectiveness of the internal control in the activity of wealth control and conflicts of interest verification"
61	Individual training charts for health and safety at work selected for testing
62	Accidents evidence Registry for the year 2013
63	Internal norms for work health and safety for 2013
64	Prevention and protection plan for 2013
65	Own instructions for work safety prepared during 2013
66	Scope of work health and safety training during 2013
67	Cash registries, including corresponding documentation, for the months selected for testing
68	Internal note for implementation, within ANI of Law no 176/2010 provisions, regarding the constraint to submit wealth and interest statements
69	Wealth statements Registry for statements prepared in 2013
70	Interest statements Registry for statements prepared in 2013
71	Documentation regarding confirmation on the position for the debutant selected
72	List of overtime during 2013
73	Delegations of responsibilities from the President to the Vice-President
74	ANI President Orders on delegation Vice-President's responsibilities
75	Risk Register / Managerial Control System
76	Internal Public Audit Strategic Plan for the period 2014-2016, including forwarding address to ANI President (and his subsequent approval) and Plan's justification memo
77	ANRMAP report for public procurement in 2012, as well as in 2013
78	General letter on macroeconomic context, methodology for preparation of budget projects for 2013 and estimations for 2014-2016, as well as expenses limits set for principal credit ordinates
79	Credit transfers during 2013
80	ANI President Order for organization and performance of preventive financial control
81	Registry with operations under preventive financial control during 2013
82	Appointment letter of delegated preventive financial control (CFDP), detailing operations under CFDP visa and monetary limits
83	Stock count lists as at 31.12.2013
84	Stock count registry as at 31.12.2013

No	Name of document
85	Minimum annual activities plan for 2013 and 2014, on ethics counseling
86	Documentation for meetings on ethics held during 2013

APPENDIX 3B List of documents analyzed during the assessment of the IT system

No	Name of document
1	Website hosting and management services contract (www.integritate.eu) Star Storage 578/10.04.2013
2	Services framework agreement Star Storage S/126/19.10.2009
3	Services contract 2029/31.05.2012 Star Storage
4	Firewall equipment maintenance services contract – E-Factor Solutions 1129/14.03.2013
5	Maintenance and repair computing equipment services contract – Alliance Computers SRL 1167/15.03.2013
6	Vodafone internet access contract 5254/ 24.07.2013
7	Public network management services contract – SC European Business Machines SRL 1130/14.03.2013
8	Call center maintenance T&T Consulting 1071/11.03.2013
9	Policy POL-01/SI Information Security Management System Policy
10	Policy POL-02/SI Business Continuity Management Policy
11	Policy POL-06/SI Physical Security Policy
12	General System Procedure PS – 02 Documents control
13	General System Procedure PS – 03 Records Control
14	General System Procedure PS – 04 Internal audit
15	General System Procedure PS – 05 Nonconformities, Corrective and preventive action
16	Operational procedure PO–01/SI Information security risks management
17	Operational procedure PO 02/SI Incident management
18	Operational procedure PO–03/SI Information resources management
19	Operational procedure PO–04/SI Change management
20	Disaster recovery plan

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
1.1. Activity effectiveness (reducing the timing / costs for investigating cases) through the use of IT solutions	1.1.1. Acquisition, delivery and installment of hardware products designed to simplify the procedure for completing, archiving and automatic analysis of documents	2011 – 2014	<p>Data security component:</p> <ul style="list-style-type: none"> ➤ Access to secure databases; ➤ Monitored and audited access to information; ➤ Assured protection against unauthorized database access attempts; <p>Network type component:</p> <ul style="list-style-type: none"> ➤ Private internal network; ➤ Secure external network; ➤ Communication between networks; <p>Protection and access component:</p> <ul style="list-style-type: none"> ➤ Accelerated encrypted SSL communication; ➤ Applications protection; ➤ Network trafficking load distribution; ➤ Servers and storage; ➤ Extended online storage capacity for existing system; ➤ Long-time storage for statements in „nearline” type storage devices; ➤ Hardware infrastructure to accommodate proposed solution. 	<p>Implemented</p> <p>The Agency performed all stages for the purpose of acquiring, delivery and installation of hardware products designed to simplify the procedure for filling-in, archiving and automatic analysis of documents.</p> <p>Also, ANI finished the process of acquiring, delivery and configuration of necessary equipment and licenses for implementing project objective.</p> <p>In addition, the Agency finished and accepted the final electronic forms of wealth and interest statements (DAI).</p> <p>Furthermore, ANI organized users' training sessions for the purpose of familiarizing them with the new IT system.</p>

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
1.1. Activity effectiveness (reducing the timing / costs for investigating cases) through the use of IT	1.1.2. Improving the process of filling in the wealth and interests statements, simplifying work procedures and improving the evaluation process through the use of advanced software technology.	2011 – 2014	<p>E-forms component – Smart forms</p> <p>Smart forms for electronic completion of implemented statements;</p> <p>Electronic signature with a qualified digital certificate used:</p> <ul style="list-style-type: none"> ➤ <i>Digital certificate for signing statements implemented at institutional level</i> ➤ <i>Digital certificate of the institution, used by each employee</i> ➤ <i>Procedure for verifying the signature when processing an implemented statement</i> <p>Temporal mark type signature for every applied archived statement (a predefined time period before expiring - ex: 90 days).</p> <p>Open source Monitoring aspect:</p> <ul style="list-style-type: none"> ➤ Multiple-source of information search procedure, with aggregation of results in an unified, implemented interface; ➤ Monitoring of web-sites; ➤ Monitoring of news agencies (RSS fluxes, etc.). <p>Intelligent data analysis component</p> <p>Automatic analysis:</p> <ul style="list-style-type: none"> ➤ <i>Reports and analysis performed on collected data;</i> ➤ <i>Implemented process for monitoring stabile performance indicators at institutional level;</i> ➤ <i>Use of other data sources for reporting;</i> <p>Visual analysis:</p> <ul style="list-style-type: none"> ➤ <i>Visual investigation model based on collected data and external data sources (ANAF, ONRC etc.).</i> 	<p>Implemented</p> <p>The Agency implemented the IT system based upon wealth and interest statements electronic forms. Also, training sessions for familiarizing with the new IT system have been sustained with:</p> <ul style="list-style-type: none"> ✓ 60 application users (Integrity Inspectorate, Legal, Public Relations and Communications General Directorate, Communications, Public Relations and Strategy Directorate); ✓ 5 IT application administrators; ✓ 326 persons responsible for implementing legal provisions regarding wealth and interest statements, in accordance with Law 176/2010 provisions. <p>http://integritate.eu/home/achizitii-publice/proiect-cod-smis-34972.aspx</p>

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
1.1. Activity effectiveness (reducing the timing / costs for investigating cases) through the use of IT	1.1.3. Analysis of risk factors and vulnerable sectors	2011 – 2014	<ul style="list-style-type: none"> ➤ Identified risk factors; ➤ Identified vulnerable sectors; ➤ Risk analysis integrated in SIMIDAI. 	<p>Partially implemented</p> <p>During 2013, upon performing incompatibility situation evaluation procedures, ANI identified a number of 42 local officials exercising simultaneous mayor / deputy mayor function and held the quality of representative to the administrative – territorial unit within Shareholders General Assembly for local interest trading companies (22 local officials from Constanta county and 20 mayors from Sibiu county).</p> <p>Furthermore, ANI initiated the project “Joint Task Mechanism on Mapping Risk Areas in Conflict of Interest in Romania” in collaboration with Public Politics Institute, Center for support of non-governmental organizations, Basel Institute for Government and Secretary Associations at town and county level. Project’s objective is prevention and early detection of conflicts of interest risk areas, by identifying most vulnerable areas (e.g. public procurement) and should take place over a period of 24 months.</p>

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
1.1. Activity effectiveness (reducing the timing / costs for investigating cases) through the use of IT	1.1.4. Insuring continuity 2013 – 2014 regarding publishing the wealth and interests statements by resuming the bid procedure for SIMIDAI	2013 – 2014	<ul style="list-style-type: none"> ➤ Resumed auction procedure; ➤ Assigned contract. 	Partially implemented The tender procedure for the Wealth and interest statements IT integrated management system has been resumed during 2013; upon procedure finalization the contract will be awarded.
	1.1.5. Identification of institutions outside Romania that can provide data and information regarding evaluation activity	January 2013	<ul style="list-style-type: none"> ➤ Institutions identified ➤ Contacts established 	Not implemented
1.2. Increasing the celerity of evaluation procedures	1.2.1. Using and improving standard operative evaluation procedures	Permanent	<ul style="list-style-type: none"> ➤ Improved investigational check-list 	Implemented At ANI level, the specific Operational Procedures Manual has been implemented and is subject to periodic updates.

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
1.3. Continuous professional development of integrity inspectors and DJCRPC personnel, departments that are directly or indirectly involved in the evaluation or monitoring of cases investigated by ANI	1.3.1. Training of ANI personnel in the use of new technologies corresponding to the project <i>“Efficient public services by simplifying the procedure for filling in, archiving and analysis of documents within ANI and the facilitation of electronic access to public interest information”</i>	2011 – 2014	<ul style="list-style-type: none"> ➤ One course for professional development / official certification for data and information analysis / five integrity inspectors trained; ➤ Two study visits; ➤ Five training sessions – familiarization with “work-flow” processes / ten persons trained. 	<p>Partially implemented</p> <p>During 2013, at ANI level:</p> <ul style="list-style-type: none"> ✓ 5 integrity inspectors participated at the “Financial Investigation Training & Operative Data Analysis Course”, organized by College of Policing and Serious Organized Crime Agency (SOCA), and ✓ 60 ANI employees have been training regarding work processes implemented through the new IT systems part of the project “Effective public services by simplifying the procedures for filling-in, archiving and analysis of documents within National Integrity Agency and facilitating electronic access to public interest information”. <p>Additionally, during 2012, ANI performed a study visit in UK in order to document best practices on methods to implement project’s objective.</p>
	1.3.2. Training of newly employed integrity inspectors, on IT and procedures	Permanent	<ul style="list-style-type: none"> ➤ Minimum two training sessions per newly employed inspector 	<p>Implemented</p> <p>Newly hired integrity inspectors in 2013 participated to the following professional training/development programs:</p> <ul style="list-style-type: none"> ➤ SMSI training session, ➤ SIMIDAI test environment training and work session, ➤ Training course “Diplomacy in public administration and international relations”, ➤ Professional development course “Public acquisitions”, ➤ Training course for obtaining Legal English

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
				<p>International Certificate,</p> <ul style="list-style-type: none"> ➤ “Development program in financial investigations and recovery of goods from crimes area”, organized by Ministry of Justice and “International Center for Asset Recovery”, ➤ “Applied communication – Legal and Integrity Domain” course.

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
1.3. Continuous professional development of integrity inspectors and DJCRPC personnel, departments that are directly or indirectly involved in the evaluation or monitoring of cases investigated by ANI	1.3.3. Training of integrity inspectors on “train the trainers”, to allow them to teach and instruct new employees, to maintain the exchange of experience and best practices at international level, etc.	Permanent	<ul style="list-style-type: none"> ➤ 5 inspectors trained on the program “<i>train the trainers</i>”; ➤ New staff trained on IT and procedures 	<p>Partially implemented</p> <p>During 2013, one ANI employee participated in the second seminar dedicated to train the trainers in the area of crime product recovery part of the joint professional development program launched by the National Bureau for Crime Prevention and Cooperation for Recovery of Crime Debts and Stolen Asset Recovery Initiative, developed by World Bank and United Nations Office on Drugs and Crime.</p>

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
1.4. Monitoring the progress of causes redirected by the Agency to the competent institutions / authorities	1.4.1. Monitoring the progress and finalization of causes redirected by the Agency to the competent institutions / authorities by using the reporting module – end to end process within SIMIDAI	Weekly	<ul style="list-style-type: none"> ➤ Statistics performed; ➤ Daily updated SIMIDAI reporting matrix. 	<p>Partially implemented</p> <p>At DGJRPC level, statistics on ANI activity are prepared. These statistics are included in both ANI management activity reports and in progress reports submitted to the European Commission in respect of the Cooperation and Verification Mechanism.</p> <p>As to the SIMIDAI reporting matrix indicator, at the end of 2013, it was under implementation. As to the planning prepared, this indicator shall be implemented by the first part of February 2014.</p>
	1.4.2. The development and consolidation of ANI database on cases currently in Courts, Prosecutors Offices and disciplinary commissions, legal files on litigations as well as solutions given by legal, jurisdictional and institutional entities	Permanent	<ul style="list-style-type: none"> ➤ Completed database 	<p>Implemented</p> <p>At DGJRP level, a daily updated database has been implemented that manages causes currently in Court.</p>

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
1.4. Monitoring the progress of causes redirected by the Agency to the competent institutions / authorities	1.4.3. Data and statistic reports analysis obtained following monitoring and identifying legal issues regarding the application of relevant laws	Quarterly	➤ Completed analysis reports	<p>Partially implemented</p> <p>During 2013, DGJRPC started the process of preparing a selection of court decisions, classified based on forfeiture wealth objects, incompatibilities and conflicts of interest.</p>

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
1.5. Efficient planning of Agency resources, to boost the operational activities	1.5.1 Priority planning of evaluation activity after identifying vulnerable areas	Permanent	<ul style="list-style-type: none"> ➤ Evaluation reports ➤ Analysis on risk areas 	<p>Partially implemented</p> <p>During 2013, upon performing incompatibility situation evaluation procedures, ANI identified a number of 42 local officials exercising simultaneous mayor / deputy mayor function and held the quality of representative to the administrative – territorial unit within Shareholders General Assembly for local interest trading companies (22 local officials from Constanta county and 20 mayors from Sibiu county).</p> <p>Furthermore, ANI initiated the project “Joint Task Mechanism on Mapping Risk Areas in Conflict of Interest in Romania” in collaboration with Public Politics Institute, Center for support of non-governmental organizations, Basel Institute for Government and Secretary Associations at town and county level. Project’s objective is prevention and early detection of conflicts of interest risk areas, by identifying most vulnerable areas (e.g. public procurement).</p> <p>Given that the project shall take place over a period of 24 months, upon project finalization the measure could be assessed as implemented.</p>

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
1.5. Efficient planning of Agency resources, to boost the operational activities	1.5.2. Founding the Agency's budget according to stringent necessities	Permanent	➤ Insured budget	<p>Implemented</p> <p>Through the 2014 State budget Law no 356/2013, the ANI income and expenses budget was approved, in the amount of RON 19,390,000.</p> <p>Through the 2013 State budget Law no 5/21.02.2013, the ANI income and expenses budget was approved, in the amount of RON 17,942,000.</p>
	1.5.5. Enhancement of ANI internal control systems implementation activities	January 2013	<ul style="list-style-type: none"> ➤ Approved program for development of the internal control / managerial system ➤ Approved procedures ➤ Finalized sensitive functions inventory process ➤ Filled-in registry 	<p>Implemented</p> <p>At ANI level, the specific Operational Procedures Manual is implemented and is subject to periodic updates.</p> <p>Also, at ANI level it was implemented and formalized in a procedure the managerial control system and the risk registry. The risk registry is under periodic update.</p> <p>Development of internal control system materialized through implementation of SAP system allowing the performance of managerial control and transparency of documents' flow in terms of scalability and traceability.</p> <p>Implementation of document management application (DMS) in March 2013 resulted in improving the managerial control system ensuring the traceability of information flow at Agency's level and an increase in personnel accountability, at each structure level.</p>

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
1.6. Development of a positive organizational culture and stimulating employees' pro-active attitude	1.6.2. Preparation of Human Resources Management Strategy 2013 – 2016	March 2013	<ul style="list-style-type: none"> ➤ Measures for insuring identified effective human resources management ➤ Preparation of Strategy 	<p>Partially implemented</p> <p>During 2013, Human Resources Department prepared the Public servants professional development Plan. This plan is quarterly monitored through the preparation of reports on implementation status for planned measures on Agency's personnel professional development.</p> <p>In respect of the Human resources management Strategy, the deadline for its preparation has been set as first quarter of 2014.</p>
2.1. Improving the process of communicating of public interest information	2.1.1. Extending the information capacity of citizens and of institutions interested in the services offered by the Agency, through developing the Portal type	2011- 2014	<p>Portal development component</p> <ul style="list-style-type: none"> ➤ Upgrading the existing Portal platform to an Enterprise type Portal platform; ➤ Hosting the portal and the site in the same location; ➤ Published intelligent forms for subsequent completion; ➤ Summaries, reports and statistic statements intended for general public. <p>Digitization services component</p> <ul style="list-style-type: none"> ➤ Electronic statements conversion. 	<p>Implemented</p> <p>All established evaluation indicators were implemented.</p>
	2.1.2. Publishing, on ANI website, of evaluation reports and court orders remained Acts, published final rulings and decisions, as well as final decisions of disciplinary commissions	Permanent	<ul style="list-style-type: none"> ➤ Acts, rulings and decisions published 	<p>Implemented</p> <p>On ANI website are published definitive and absolute decisions of courts (wealth forfeiture, incompatibilities and conflicts of interest), as well as absolute incompatibilities (with 3 year restraint).</p>

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
2.1. Improving the process of communicating of public interest information	2.1.3. Publishing on the ANI web-site of the status of cases currently in court, for causes regarding the evaluation of wealth, conflicts of interest and incompatibilities, as well as decisions given by the disciplinary commissions	Permanent	➤ Permanent updating of „Court files” section	Implemented As per provisions of procedure in force, the update of “Court files” section should be performed weekly. Upon examination of ANI website, under section “Court files” we noticed that the last update was made on 14.03.2014.

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
2.2. Improving the understanding of mechanisms used in the correct submission of wealth and interests statements	2.2.1. Updating and improving the Guide for completing wealth and interests statements	Permanent	➤ Updated Guide published on ANI web-site	Implemented On ANI's website it is published the Guide to filling-in wealth and interest statements, third edition, May 2013.
	2.2.2. Creating video tutorials for filling in wealth and interests statements	January 2012	➤ Video tutorials published on ANI web-site	Partially implemented At the time of the audit, there were no video tutorials for completing wealth and interests statements on ANI web-site. Our understanding is that this process started in 2013 through the creation of tutorials structure in Microsoft Power Point. Subsequently, after the versions are finalized and approved, the video version of tutorials will be realized. At the time the audit was performed, video tutorials were finalized and were due to be posted on the ANI website.
	2.2.3. Updating and improving the frequently asked questions section (F.A.Q.)	Permanent	➤ Updated section published on ANI web-site	Implemented The frequently asked questions section shall be improved once the Agency's website new design shall be implemented.

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
2.2. Improving the understanding of mechanisms used in the correct submission of wealth and interests statements	2.2.4. Training people from the public institutions / authorities, responsible for implementing the legal provisions regarding wealth and interests statements	Permanent	<ul style="list-style-type: none"> ➤ 50 training sessions; ➤ 1,000 responsible people trained. 	<p>Implemented</p> <p>During 2013, ANI organized two presentation and training sessions for persons responsible for implementing the legal provisions regarding wealth and interest statements within the project “Effective public services by simplifying the procedure to fill in, archive and analysis of documents within ANI and facilitating electronic access public interest information”, as follows:</p> <ul style="list-style-type: none"> ✓ During 18-22 November 2013 – 265 participants, ✓ On 5 December 2013 – 61 participants.
2.3. Stimulating the civic attitude of citizens, leading to making notifications addressed to ANI	2.3.1. Developing the facilities of the public Portal for wealth and interests statements	2011-2014	<p>Portal development component</p> <ul style="list-style-type: none"> ➤ Improved existing Portal – ergonomics, look & feel. 	<p>Implemented</p> <p>Please refer to 2.1.1. above.</p>

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
2.3. Stimulating the civic attitude of citizens, leading to making notifications addressed to ANI	2.3.2 Dissemination of information regarding methods of notifying the Agency	Permanent	➤ Information materials posted on the web-site	Implemented Methods of notifying ANI are published on ANI web-site, under complaints section http://www.integritate.eu/home/sesizari.aspx .
	2.3.3 Giving specialized assistance to individuals and legal entities that make notifications	Permanent	➤ Number of replies (written and by telephone) to requests and petitions addressed to the Agency	Implemented During 2013, ANI conferred specialized assistance to individual persons and legal entities that requested clarifications regarding normative acts on ways to fill in and submit wealth statements, legal regime of incompatibilities and conflicts of interest. Thus, 1,593 points of view have been issued, as follows: <ul style="list-style-type: none"> ○ 280 points of view regarding legal regime of conflicts of interest; ○ 1,215 points of view regarding legal regime of incompatibilities; – 98 points of view regarding ways to fill in / submit wealth and interest statements.

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
2.4. Consolidating the standards of integrity and ethics of the Romanian public function, in accordance to the levels established by European Union member states	2.4.1. Implementing the project “Developing an integrated and unified integrity system in public function”	24 months since the project's approval	<ul style="list-style-type: none"> ➤ 1,080 civil servants with improved standards of expertise and knowledge; ➤ 1,200 civil servants trained in the program for ethical training/qualification certificates; ➤ 20 civil servants instructed in the train the trainers domain: <ul style="list-style-type: none"> ○ Defined integrity systems; ○ Information system for monitoring the activity of ethics counselors; ○ Study visit; ○ Awareness campaign “BE ETHICAL, BE HONEST!” ○ TV commercial. 	<p>Not implemented</p> <p>The financing request for this project, whose beneficiaries are the National Agency of Civil Servants and ANI, through the Operational Program Development of Administrative Capacity is pending evaluation.</p> <p>This project has been approved for funding by the Management Authority – Operational Program Development of Administrative Capacity, however, at this moment, funding sources necessary for implementation are not available.</p>

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
2.5. Cooperation with magistrates from the investigation of wealth Commissions from the Courts of Appeal in regards to instrumenting cases submitted by the Agency	2.5.2. Organizing roundtables between ANI management, CSM management and management of Appeal Courts, in order to identify problems that may occur in investigating cases submitted to Investigation of Wealth Commissions	Permanent	<ul style="list-style-type: none"> ➤ Number of meetings organized; ➤ Identified issues. 	<p>Implemented</p> <p>The objective of the project "Increase of Romanian legal system capacity to approach unjustified wealth", developed by ANI in cooperation with Romanian Academic Society and Judiciary National Institute, is to improve operative activity and ensure an active monitoring of cases progress under investigation of Wealth Search Committees or courts.</p>
	2.5.3. Preparing, in collaboration with CSM, of orientation guidelines regarding instrumentation procedures for cases of confiscation of wealth, for magistrates and prosecutors of the Investigation of Wealth Commissions from the Appeal Courts	December 2011	<ul style="list-style-type: none"> ➤ Guidelines prepared and disseminated for magistrates and prosecutors 	<p>Partially implemented</p> <p>Following combined magistrates and integrity inspectors points of view which were concluded within discussion sessions, a guide shall be prepared that will help parties involved in interpreting the legislation in this area. These guidelines shall be electronically distributed to the 15 Courts of Appeal.</p> <p>These guideline were not yet prepared, given that, in order to have a comprehensive approach, ANI shall wait for courts issuing decisions in cases where ANI identified unjustified differences between wealth and revenues.</p>

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
	2.5.4. Submitting decisions issued by the first court and those issued by Investigation of Wealth Commissions to CSM and their input into the internal recording system	Permanent	➤ Documentation submitted to the CSM	Implemented During 2013, ANI submitted the decisions issued by first courts and by Investigations of Wealth Commissions to CSM.
	2.5.5. Consolidation of ANI role in the context of conflicts of interest/ incompatibilities regime issues which might rise with respect to the performing public procurement contracts awarding procedures	Permanent	<ul style="list-style-type: none"> ➤ Critic analysis performed over the effectiveness of Romanian legal framework regarding conflicts of interest ➤ Joint seminars and exercises of collaboration for integrity inspectors and other personnel categories from legal/administrative institutions with role in combating and prevention of corruption ➤ Work and education guides performed ➤ Roundtables organized for disseminating information and exchange of best practices 	Implemented <p>At the beginning of 2013, Romania Government approved the "Memorandum for ensuring an effective ex-ante verification of conflicts of interest in awarding of public procurement contracts process by modifying the legal framework and implementing an integrated IT system for prevention and identification of situations which determine a conflict of interest, so that ANI to signal these situations to contracting authorities, in public procurement process performed within projects funded through European funds".</p> <p>In order to achieve memorandum's objectives, ANI constituted a work group with the purpose to write a project for modification and completion of applicable legislation in order to achieve the measures stated in the memorandum.</p> <p>Thus, in February 2013, the first work meeting took place that reunited representatives of High Court of Cassation and Justice, Ministry of Justice, National Authority for Regulating and Monitoring of Public Procurement, Unit for Coordination and Verification of Public Procurement, Ministry of Regional Development and Public Administration, Ministry of European Funds, Anti-fraud Department, Romanian</p>

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
				<p>Information Service. During the meeting it were defined the elements under ANI competence, namely providing examples of fraud patterns, identification of filters to be included in the electronic form and preparation of a set of regulation changes.</p> <p>Also, in May 2013, the second work meeting took place at ANI headquarter, reuniting experts from all authorities with responsibilities within the public procurement process performed in project funded through European funds. During the meeting, it was subject to debate the Law Project on implementing a mechanism for preventing conflicts of interest in procedures for granting European Funds; it was presented the architecture of the integrated IT system created by Deloitte from set technical parameters; it were defined the specific elements to be included in the integrity form that will be introduced as an interface in the Public Procurement Electronic System (SEAP).</p> <p>For the purpose of making the IT system (named PREVENT System) operational, ANI accessed European structural funds by applying to the financing program within Increasing Economic Competitiveness Sectorial Operational Program (POS CCE) 2007 – 2013, 3rd Axis "Information and communication technology for private and public sectors".</p> <p>On 4 December 2013, it was signed the financing contract, with a value of RON 31,025,648.50 (approx. EUR 7,000,000); the system shall be implemented over a period of 16 months.</p> <p>ANI contracted specialist technical assistance services for preparation of documentation afferent to public procurement procedure, and it was published in SEAP the participation conditions to</p>

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
				<p>the tender for implementation of PREVENT System – “Integrated IT system for prevention of public procurement conflicts of interest”.</p> <p>On 5 March 2013, the procedure of opening the public procurement offers shall take place.</p> <p>Also, the Agency joined civil society efforts regarding public procurement problems by assigning an ANI expert who will participate as trainer at the seminar organized by Freedom House “National and European funds fraud, a penal and administrative approach”, part of the project “Fighting crime in public procurement. An operational approach”.</p> <p>ANI hosted the campaign developed by Public Policy Institute for awareness on the Public Procurement System in Romania’s credibility by increasing procedures’ transparency, called “Open doors day in public procurement”.</p>
2.6. Prevention and identification of situations which determine a conflict of interest in public procurement within projects financed from European funds by implementing PREVENT Project	2.6.1. Preparation and approval of a memorandum for ensuring an efficient mechanism for ex-ante verification of conflict of interest in public procurement contracts awarding process	January 2013	➤ Approved memorandum	<p>Implemented</p> <p>Please refer to assessment of measure 2.5.5. above.</p>

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
	2.6.2. Setting-up a work group with representatives from more institutions with the purpose to make a proposition regarding a project to modify and complete applicable legislation to ensure achieving the measures proposed in the memorandum	1 st Quarter – 2013	<ul style="list-style-type: none"> ➤ Setting-up a work group ➤ Making propositions for modification of legislation ➤ Preparing legislative proposal 	<p>Implemented</p> <p>Up to the date of the assessment, two meetings of the work group have been organized, as follows:</p> <ul style="list-style-type: none"> ✓ On 28 February – there were defined the elements under ANI competency, namely: providing examples of fraud patterns, identification of filters to be included in the electronic form and preparation of a set of regulation changes. ✓ On 20 May, the second work meeting took place at ANI headquarter, reuniting experts from all authorities with responsibilities within the public procurement process performed in project funded through European funds. During the meeting, it was subject to debate the Law Project on implementing a mechanism for preventing conflicts of interest in procedures for granting European Funds.
	2.6.3. Providing specialist consulting services, pre-feasibility study, risk and impact analysis to fundament elaboration of technical specifications necessary for acquisition of PREVENT System	1 st Semester – 2013	<ul style="list-style-type: none"> ➤ Elaboration of pre-feasibility study ➤ Preparation of risk and impact analysis 	<p>Implemented</p> <p>During 2013, ANI contracted Deloitte services to perform a, pre-feasibility study, risk and impact analysis to fundament elaboration of technical specifications necessary for acquisition of PREVENT System.</p>
	2.6.4. Implementation of PREVENT System	2 nd Semester –	<ul style="list-style-type: none"> ➤ Approved financing request ➤ Implemented IT modules 	<p>Partially implemented</p> <p>For the purpose of making the IT system (named PREVENT System) operational, ANI accessed</p>

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
	(Integrated IT system to prevent public procurement conflict of interest)	2014		<p>European structural funds by applying to the financing program within Increasing Economic Competitiveness Sectorial Operational Program (POS CCE) 2007 – 2013, 3rd Axis “Information and communication technology for private and public sectors”.</p> <p>On 4 December 2013, it was signed the financing contract, with a value of RON 31,025,648.50 (approx. EUR 7,000,000); the system shall be implemented over a period of 16 months.</p> <p>ANI contracted specialist technical assistance services for preparation of documentation afferent to public procurement procedure, and it was published in SEAP the participation conditions to the tender for implementation of PREVENT System – “Integrated IT system for prevention of public procurement conflicts of interest”.</p> <p>On 5 March 2013, the procedure of opening the public procurement offers shall take place.</p>

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
3.1. The development and consolidation of partnerships with public institutions and nongovernmental organizations at national and international level, with the purpose of professional training of operational personnel	3.1.1. Maintaining a permanent connection with courts of law and prosecution bodies, in accordance to art. 19 para. (2) of Law no 176/2010	Quarterly	➤ Number of quarterly notifications submitted to prosecution bodies on measures taken in files transmitted by the Agency	<p>Partially implemented</p> <p>The collaboration protocol between ANI and the Prosecutor's Office attached to the Supreme Court has been renewed on 29 May 2013, with the purpose to continue the inter-institutional collaboration.</p> <p>Additionally, during 04 – 09 September 2013, a delegation led by Agency's President took part to the 2nd inter-institutional annual meeting for the purpose of achieving the objectives set through Anti-corruption National Strategy 2012 – 2015.</p> <p>Also, during 2013, ANI submitted the decisions issued by first court and Investigations of Wealth Commissions to CSM.</p>

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2012
3.1. The development and consolidation of partnerships with public institutions and nongovernmental organizations at national and international level, with the purpose of professional training of operational personnel	3.1.2. Issuing points of view in regards to legislative projects currently under public debate / in front of specialized Parliament commissions, regarding ANI field of activity	Permanent	➤ Number of points of view issued	<p>Implemented</p> <p>At the request of the Department for Parliament Relations of the Romanian Government, the Agency constantly expresses its points of view in regards to legislative projects that regulate ANI activity.</p> <p>During 2013, ANI issued:</p> <ul style="list-style-type: none"> ✓ Three negative points of view regarding the proposition on modification and completion of Law on local public administration no 215/2001, republished, with subsequent additions and completions; ✓ One negative point of view regarding modification and completion of Law no 393/2004 on local officials statute; ✓ Four negative points of view regarding modification of Law 161/2003 on some measures for ensuring transparency in the exercise of public dignities, public functions and in the business environment, prevention and sanctioning of corruption; ✓ One negative point of view regarding modification of Law no 96/2009 on deputies and senators statute; ✓ One negative point of view regarding modification of Law on 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.

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2012
	3.1.3. Identifying the necessity for professional training of operational staff through the Training Strategy	Yearly, first quarter	Centralized data regarding the necessary professional training	Implemented At the beginning of 2013, Human Resources Department prepared the Annual Plan on professional development of public servants within the Agency, considering the propositions made by specialized compartments, on the needs for training and professional development of the personnel, Training Strategy 2011 – 2014, provisions of ANI Strategy 2011 – 2014, as well as objectives stated in the Anti-corruption National Strategy 2012 – 2015.

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
3.1. The development and consolidation of partnerships with public institutions and nongovernmental organizations at national and international level, with the purpose of professional training of operational personnel	3.1.4. Identification of possible training suppliers and the start-up of acquisition procedures for services, split according to the interest domains	Yearly	<ul style="list-style-type: none"> ➤ Training suppliers identified; ➤ Services acquired. 	<p>Implemented</p> <p>During 2013, the following trainings have been recorded:</p> <ul style="list-style-type: none"> ➤ Third party course for IT security management system, in accordance with SR ISO/CEI 27001:2006 standard – RINA SIMTEX ORGANISMUL DE CERTIFICARE S.R.L ➤ School of Public Finance and Customs – Course “Risk management, basic concepts and implementation at the level of public institution” – Ministry of Public Finances ➤ The International Center for Asset Recovery – Course Financial Investigations and Asset Recovery – Ministry of Justice ➤ Seminar “Prevention of Professional Diseases” – Labor Territorial Inspectorate ➤ Course “Management and protection of classified information” – Infoprotect Consulting Network SRL ➤ Course “Audit and Internal Control. Application of Order no 946” – Editura Arte SRL ➤ Course “Management of public function and aspects on public servants carrier” – Asociatia Profesionala a Specialistilor in Administratia Publica (APSAP) ➤ Course “Perspectives and challenges in internal control” – Internal Control Institute ➤ Course “Human Resource manager and inspector” – Extreme Training SRL ➤ Course “Transition to ISO/IEC 27001:2013” – Rina SIMTEX Organismul de Certificare SRL ➤ English language course – British Council

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Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
3.1. The development and consolidation of partnerships with public institutions and nongovernmental organizations at national and international level, with the purpose of professional training of operational personnel	3.1.5. Implementing partnerships	Yearly	<ul style="list-style-type: none"> ➤ Training plan performed; ➤ All operational staff trained 	<p>Implemented</p> <p>The collaboration protocol between ANI and the Prosecutor's Office attached to the Supreme Court has been renewed on 29 May 2013, with the purpose to continue the inter-institutional collaboration.</p> <p>During the visit of Ethics and Anti-corruption representatives from Republic of Kenya, it was signed a cooperation protocol between the two institutions with the purpose of continuing the collaboration regarding exchange of experiences and best practices in anti-corruption domain.</p> <p>At the beginning of 2013, Human Resources Department prepared the Annual Plan on professional development of public servants within the Agency, considering the propositions made by specialized compartments, on the needs for training and professional development of the personnel, Training Strategy 2011 – 2014, provisions of ANI Strategy 2011 – 2014, as well as objectives stated in the Anti-corruption National Strategy 2012 – 2015.</p>
	3.1.6. Organizing meetings with relevant actors with the purpose to obtain support in achieving ANI institutional objectives	June 2013	<ul style="list-style-type: none"> ➤ Meetings ➤ Identified joint action tools 	<p>Implemented</p> <p>During 2013, the National Integrity Council addressed the Prime Minister and Presidents of Deputies and Senate Chamber in Romania requesting support for approving Agency's budget for 2013, and 2014, for the purpose of ensuring optimum conditions for performance of ANI activities.</p>
	3.1.7. Active	Permanent	➤ Functional database	Partially implemented

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
	involvement of the Agency in STAR program – developed by World Bank and the United Nations Office on Drugs and Crime (UNDOC)		<ul style="list-style-type: none"> ➤ Joint trainings ➤ Technical assistance ➤ Exchange of best practices 	During 201, one ANI employee participated at the second seminar dedicated to train the trainer on the subject of recovery of crime products, part of the joint professional development program launched by National Office for Crime Prevention and Cooperation for Crime Asset Recovery and StAR initiative (Stolen Asset Recovery Initiative), developed by World Bank and United Nations Office on Drugs and Crime.
	3.1.8. Support and active involvement in the process of elaboration and implementation of the goods extended seizure policy	Permanent	<ul style="list-style-type: none"> ➤ Organization of consultations, roundtables, seminars ➤ Preparation of best practices guides and studies ➤ Legislative changes 	<p>Implemented</p> <p>ANI initiated the project “Joint Task Mechanism on Mapping Risk Areas in Conflict of Interest in Romania” in collaboration with Public Politics Institute, Center for support of non-governmental organizations, Basel Institute for Government and Secretary Associations at town and county level. Project’s objective is prevention and early detection of conflicts of interest risk areas, by identifying most vulnerable areas (e.g. public procurement) and should take place over a period of 24 months.</p> <p>Additionally, the Romanian Center for European Politics together with the Association for External Policy from Chisinau organized during 21 – 22 January 2013, a study visit from National Integrity Commission from Republic of Moldova at ANI headquarter.</p> <p>Also, at the time of our evaluation mission, ANI implemented in partnership with various institutions with a role in prevention and fighting of corruption and representatives of civil society the project “Fighting crime in public procurement domain” funded through the Prevention of and Fight against Crime (ISEC) program. Project’s total value is of €427,120.00 and lasts for 26 months.</p>
	3.1.9. Active	Permanent	➤ Consultations with decision factors	Implemented

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
	support for improvement and effectiveness of anti-corruption legislation		➤ Legislation proposals, etc.	<p>At the beginning of 2013, Romania Government approved the “Memorandum for ensuring an effective ex-ante verification of conflicts of interest in awarding of public procurement contracts process by modifying the legal framework and implementing an integrated IT system for prevention and identification of situations which determine a conflict of interest, so that ANI to signal these situations to contracting authorities, in public procurement process performed within projects funded through European funds”.</p> <p>In order to achieve memorandum’s objectives, ANI constituted a work group with the purpose to write a project for modification and completion of applicable legislation in order to achieve the measures stated in the memorandum. The work group held a number of two meetings during 2013.</p>
3.2. Cooperation with European Union institutions, for the fulfillment of assumed objectives	3.2.1. Information exchange with external institutions with which the Agency signed collaboration protocols regarding institutional developments	Every 6 months	➤ Progress reports submitted to partner institutions	<p>Implemented</p> <p>During 2013, ANI submitted seven progress reports and updates to these reports within Cooperation and Verification Mechanism.</p>

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
3.2. Cooperation with European Union institutions, for the fulfillment of assumed objectives	3.2.2. Improving the collaboration with diplomatic missions in Romania by regularly submitting progress reports and inviting them to events to which the Agency participates	Permanent	<ul style="list-style-type: none"> ➤ Number of reports sent per diplomatic mission per year; ➤ Number of participations by foreign mission representatives to Bucharest per event. 	<p>Implemented</p> <p>During 2013, ANI submitted seven progress reports and updates to these reports within Cooperation and Verification Mechanism.</p> <p>ANI submits to diplomatic missions press/media handouts on operational or administrative activities</p>

APPENDIX 4 Action Plan on implementing ANI Strategy for combating and preventing the accumulation of unjustified wealth, conflicts of interest and incompatibility (continuance)

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
3.3. Increasing the Agency's operational capacity through collaboration with the civil society	3.3.1. Achieving an active connection with the civil society's environments, especially the informing, training, prevention and identification of best practices Components	Permanent	➤ Number of common actions carried out (projects carried out in partnership, roundtables on providing consultancy, etc.)	<p>Implemented</p> <p>ANI initiated the project "Joint Task Mechanism on Mapping Risk Areas in Conflict of Interest in Romania" in collaboration with Public Politics Institute, Center for support of non-governmental organizations, Basel Institute for Government and Secretary Associations at town and county level. Project's objective is prevention and early detection of conflicts of interest risk areas, by identifying most vulnerable areas (e.g. public procurement) and should take place over a period of 24 months.</p> <p>Additionally, the Romanian Center for European Politics together with the Association for External Policy from Chisinau organized during 21 – 22 January 2013, a study visit from National Integrity Commission from Republic of Moldova at ANI headquarter.</p> <p>Also, at the time of our evaluation mission, ANI implemented in partnership with various institutions with a role in prevention and fighting of corruption and representatives of civil society the project "Fighting crime in public procurement domain" funded through the Prevention of and Fight against Crime (ISEC) program. Project's total value is of €427,120.00 and lasts for 26 months.</p>
	3.3.2. Carrying out research studies, in partnership with the civil society, on the causes that generate conflicts of interest or of	June 2012	➤ Research study carried out	<p>Partially implemented</p> <p>ANI initiated the project "Joint Task Mechanism on Mapping Risk Areas in Conflict of Interest in Romania" in collaboration with Public Politics Institute, Center for support of non-governmental organizations, Basel Institute for Government and Secretary Associations at town and county level.</p>

Objective	Measure	Deadline	ANI Evaluation indicators	Deloitte Assessment as at 31.12.2013
	states of incompatibility, erroneous completion of wealth and interests statements etc.			<p>Project's objective is prevention and early detection of conflicts of interest risk areas, by identifying most vulnerable areas (e.g. public procurement) and should take place over a period of 24 months. The projects main two objectives are:</p> <p>1) <i>increasing anti-corruption policies/conflicts of interest efficiency</i> resulted following the action taken by ANI until the finalization of the project, through <i>risks configuration</i> mechanisms and procedures and early warning signals regarding possible local conflicts of interest (with a focus on public procurement)</p> <p>2) development of policies and mechanisms for prevention of corruption/conflicts of interest with a focus on the administrative level by stimulating access to previous information concerning public procurement at the same time with stimulating direct involvement of main interested local actors (local public administration and civil society) – to all these active participants ANI shall make available practical tools/construction capacity for the purpose of acting as conflicts of interest prevention agents.</p>

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