

Factual Findings Report

External audit of the Management of the National Integrity
Agency for 2024

June 2025



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Executive summary

Introduction

In accordance with the provisions of the service contract (hereinafter "the Contract"), concluded between the National Integrity Agency (hereinafter "ANI" or "Institution" or "Agency") registered under no. 6055/14.04.2025 and TGS Romania Assurance & Advisory Business Services SRL (hereinafter "TGS") under no. 7/14.04.2025, as well as with the Additional Act to the contract, we submit to you the Factual Findings Report ("Report"), regarding the performance of external audit services of ANI's management for 2024, in accordance with the provisions of art. 32 para. (1) Law no. 144/2007 on the establishment, organization and functioning of the National Integrity Agency, republished, with subsequent amendments and additions.

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

- General planning - understanding ANI's core activities and defining the audit engagement objectives, as well as understanding the risks that may be associated with the audit engagement.
- Developing the work program.
- Performing the work program and verification procedures (examination of documentation, interviews with key staff, conducting specific detailed tests).
- Drawing up the conclusions and drafting the factual findings report.

Objectives and scope of the audit engagement

The evaluation of the quality of ANI's management for 2024 was assessed during the period between April 29th and June 27th, 2025. The entire process was carried out by the team of TGS specialists, by implementing procedures specific to this engagement, namely the examination of documentation, interviews of key staff and specific detail tests. Throughout the engagement, we collaborated with ANI's representatives to achieve the objectives set as part of our technical offer.

The project was performed in accordance with:

- ✓ The tender documentation which led to the conclusion of the contract.
- ✓ International Standards on Related Services (ISRS 4400)¹;
- ✓ Legal framework applicable to the National Integrity Agency.

¹International Standards on related Services - 4400 Engagements to perform agreed upon procedures – agreed procedures

Procedures performed and factual findings.

We have planned and performed the verifications in accordance with the objective and scope of this engagement, and with the agreed-upon procedures, as they are detailed in *Chapter 2 Engagement Engagement approach, work plan and project* phases of this Report. All the procedures detailed in Chapter 2 have been performed in accordance with the terms agreed by the Contract.

By following and performing the agreed upon procedures, we obtained sufficient and appropriate evidence to issue this factual finding report in accordance with the International Standards on Related Services (ISRS 4400). The procedures performed during this engagement are neither a financial audit, nor a review and thus we do not express any assurance regarding the quality of ANI’s management and financial statements for the year that ended December 31, 2024.

In 2024, as a result of the verifications carried out, no new deficiencies were identified compared to the previous year. During this mission, we also assessed the remediation status of the deficiencies identified in previous years, included in the previous factual findings reports regarding ANI’s management evaluation. Thus, of the 46 recommendations from previous years, 74% of the total recommendations were implemented or partially implemented. The status of the deficiencies formulated in the factual findings reports for the previous years is presented in the table below:

Status of implementation of recommendations for deficiencies formulated in previous years	Impact			Total
	Major	Medium	Minimum	
Implemented recommendations	5	3	6	14
Partially implemented recommendations	9	5	6	20
Recommendations not implemented	5	4	3	12
TOTAL	19	12	15	46

The external audit of the Agency’s management carried out over the years has contributed to the quality of the processes/activities carried out within the Agency and is an important tool to ensure an independent evaluation of the level of compliance with operational procedures and undertaking responsibilities by all ANI staff, as indicated by the improvements observed during the prior audited periods.

Findings

The results of the application of the agreed-upon procedures performed in accordance with the International Standards on Related Services (ISRS 4400) are presented within this report.

Through its attributions and clearly defined status, the National Integrity Agency is an autonomous administrative authority, with exclusive competence in ensuring integrity in the activity of dignities and public functions and preventing institutional corruption, with

responsibilities in managing the system of asset and interest declarations and identifying, preventing or combating integrity incidents, as well as resolving public interest whistleblowing and following up the entire mechanism at the national level in the matter of public interest whistleblowing, operating at the national level as a unique structure.

At the same time, the Agency prepares the list of important public functions provided for in the national legislation, mentioned by Law no. 129/2019 for the prevention and combating of money laundering and the financing of terrorism, as well as for the modification and completion of some normative acts, based on the data and information immediately transmitted by the entities responsible for this obligation.

Also, the National Integrity Agency ensures compliance with the legal provisions in the process of drafting normative acts that are subject to Law no. 52/2003 on decision-making transparency in public administration.

The Agency fulfils the role of coordinator of reforms and/or investments within the National Recovery and Resilience Plan, Pillar V – *Health, as well as economic, social and institutional resilience*, Component 14 – *Good governance*, Reform 7 – *Evaluation and updating of the legislation on the integrity framework*, according to Emergency Ordinance no. 124/2021 regarding the establishment of the institutional and financial framework for the management of the European funds allocated to Romania through the Recovery and Resilience Mechanism, as well as for the amendment and completion of the Government Emergency Ordinance no. 155/2020 regarding some measures for the development of the National Recovery and Resilience Plan necessary for Romania to access reimbursable and non-reimbursable external funds within the Recovery and Resilience Mechanism, with subsequent amendments and additions.

Following the assessment of ANI's activity performed during the year 2024, we observed that ANI continued its efforts to implement measures to ensure the efficient and effective management of the institution's activity and maintained its positive results in terms of managing conflicts of interest, incompatibilities, the legal regime for declaring assets and public interest warnings. Even when a number of austerity measures have been taken at national level (e.g. suspension of vacancies, salary and budget limitations) and which have had a direct impact on ANI's activity, through the measures taken, ANI has managed to fulfil its role for which it was established and to ensure integrity in the exercise of public functions and dignity and to combat integrity incidents, in conditions of legality, impartiality, transparency and accountability.

Among the achievements for 2024, we note the following:

- Optimization and digitization of management processes and implementation of efficient working mechanisms, as in 2024 the SAS platform was implemented, which led to the streamlining of the activity on the identification of clues regarding non-compliance with the legal provisions on conflict of interest and incompatibilities, based on the declarations of assets and declarations of interests;
- Implementation at the beginning of 2024 of the new ESIMIDAI platform through which the capacity to solve the files managed by integrity inspectors was improved;
- Constant actions in the prevention of conflict of interest in the procedures for awarding public procurement contracts by establishing an ex-ante verification mechanism to remove situations that may generate conflicts of interest in procedures initiated through the

electronic public procurement system. In 2024 19,592 public procurement procedures were analyzed and 19 integrity warnings were issued for a value of 396 million lei;

- Ensured the main role of external whistleblowing channel in the public interest, during 2024 ANI continued to solve and manage reports of violations of the law, as well as provided consultations and training activities. In 2024 a number of 236 consultation activities (including confidential consultations) were carried out, which had as beneficiaries individuals authorities, public institutions, as well as private legal entities;
- Follow-up of the implementation of the recommendations made by the OECD Committees responsible for evaluating Romania's accession to the OECD, in the areas related to its activity, in order to fulfil the requirements set out in the Accession Roadmap; some of these recommendations concerned the PIAC (Integrity and Anticorruption) working group on the area of strengthening public governance;
- Continuation of the training process of the persons responsible for the implementation of the provisions of Law no. 176/2010, as well as for deponents within public authorities and institutions, on the process of submitting declarations and interests, as well as on the legal regime of incompatibilities and conflicts of interest. In 2024 more than 360 persons were trained;
- Pursued interest in attracting external funding through the following actions undertaken:
 - ✓ Continued the implementation of the projects included in Pillar II – Digital Transformation, Component 7 – Digital Transformation within the National Recovery and Resilience Plan. ANI was the beneficiary within the projects.
 - ✓ Continuation of the implementation of the project *"23RO06 Support in implementation of the integrity and anti-corruption framework in Romania, including reducing the risk of corruption in public procurement"*, the project was financed through the Technical Support Instrument (TSI) of the European Commission and carried out in partnership with the Ministry of Justice with the objective of providing technical assistance by the Organization for Economic Co-operation and Development (OECD), in order to implement the integrity and anti-corruption framework in Romania, including the reduction of risks in public procurement;
 - ✓ Continuation of the implementation of the project *"iMonitor - Enhancing law enforcement efficiency by bringing together public procurement data analytics and civil monitors"*, funded by the European Commission.
 - ✓ Start of the project *"Legitimacy and responsibility for a better protection of whistleblowers – LAW"*. ANI was the role of partner in the project.
- Continuation of transparency and awareness efforts, especially in the case of the points of view granted to petitioners who requested clarifications on the legal regime of conflicts of interest, incompatibilities, the manner of completion/submission of declarations or other situations. In 2024 a number of 2,070 points of view were granted;
- Maintaining a constant dialogue with national entities, in order to ensure an improved framework for preventing and combating integrity incidents, in the context of the electoral processes carried out in 2024, including the launch of a specific section on the Agency's website, populated with useful information for both candidates and any interested person;

- The export of best practices and strengthening international cooperation with institutions in the field of preventing and combating corruption, with similar competences to ANI. During 2024 ANI representatives participated in a number of international events, promoting ANI's institutional profile and the exchange of best practices at international level.
- Signed in November 2024, during the 23rd EPAC/EACN Annual Conference, the Memorandum of Understanding between ANI and the Hungarian Integrity Authority, which aims to raise awareness and encourage international cooperation, through the exchange of knowledge, expertise, and best practices on common areas of interest.
- Achieving 96% of the objectives set by the National Integrity Agency Strategy 2022 – 2025, with an implementation deadline by the end of 2024 or a permanent deadline. Of the total 31 objectives assumed by the programmatic document, which also include objectives with a deadline for completion by the end of 2025, 81% of the objectives have been implemented or partially implemented by December 31, 2024.
- Updating, publishing, and submitting to the European Commission the *List of Important Public Functions*, also available on the Agency's website.
- Launched in April 2024, the new ANI website with improvements in the field of functionalities and information security.
- Continuation of the implementation of the ANI's Pilot Internship Program for students, master, and PhD students.
- Achieved 74% implementation rate of the recommendations on improving the Agency's activity, formulated in the previous audit reports. 34 out of the 46 recommendations have the status implemented or partially implemented, indicates a high degree of involvement and efficiency on the part of the Institution's management.

Areas of vulnerability that may prevent the achievement of ANI's objectives and for which remedial action by management is still needed include the following:

- Shortage of human capital, as the level of job occupancy is 53% at the end of 2024, 85 positions were occupied out of the total of 160 approved positions, the occupancy rate of current job positions is still low. Related to ANI's core activity, at the level of the 2 specific directorates (General Directorate for Integrity Inspection and Directorate for Whistleblowers in the Public Interest), the occupancy rate is only 45%, 35 positions were occupied, and 42 positions were vacant at the end of 2024. Therefore, the workload of integrity inspectors is very high considering the complexity and volume of work and sensitive information they manage.
- Attracting talented and qualified employees, as well as retaining existing employees, is an extremely challenging process considering the relationship between the benefits offered by the position of integrity inspector and the complexity of the work to be performed. The uncompetitive financial benefits and the lack of a legal framework that clearly regulates the special status of the integrity inspector, led to a low interest in potential candidates, which is also reflected in the low number of candidates applying for the organized recruitment sessions.
- The lack of a coherent and unitary legal framework for the prevention and sanctioning conflicts of interest, incompatibilities and unjustified assets, as well as the successive

amendments to the integrity laws lead to a considerable increase in the lack of clarity and legal certainty and reduce efficiency and effectiveness of the integrity system.

Bucharest, June 27, 2025

In the name:

TGS Romania Assurance & Advisory Business Services SRL

Registered in the electronic public register of financial auditors and audit firms with number FA 91

For signature, please refer to the
Romanian version

Madeline Alexander

Audit Partner

Registered in the electronic public register of financial auditors and audit firms with number AF 36

1 Objectives and Scope of the project

According to the Contract, the engagement specific's objective, as defined in the Tender Documentation, is to carry out the external audit of the management of the National Integrity Agency, for the year 2024, in accordance with the International Standards on Related Services (ISRS 4400) – Engagement Mission to carry out the agreed procedures. The purpose of this engagement is to contribute to the improvement of the general management of the National Integrity Agency and at a minimum to bring added value to the Agency, by carrying out an objective evaluation of the activity carried out by all structures of the Agency, and by drafting potential recommendations related to these findings.

The expected results of the project are as follows:

- Elaboration of a factual findings report on the proper functioning of the management system, which will include the findings identified during the audit mission as well as the implementation of the recommendations made in previous years.
- Draft viable, specific, achievable and qualitative recommendations, meant to significantly improve the managerial performance of the Agency as part of a letter to the management of the Agency.
- Presentation of the findings in work sessions where recommendations are analyzed.
- Integration of possible deficiency received from ANI's management in the analysis performed.

2 Engagement approach, work plan and project phases

The project was approached in four phases, correlated with the objectives pursued to achieve the project result, as follows:

1. General project planning.
2. Developing the engagement plan.
3. Performing the engagement plan.
4. Conclusions and reporting results.

2.1 General project planning

In the general planning phase of the project, we considered two essential aspects, namely the understanding of the Agency's activity and the risk environment. Therefore, as part of the planning phase, we carried out the following steps:

- Organize the „kick-off“ meeting.
- Prepare the preliminary request for information.
- Determine and establish the professional standards applicable to the engagement with ANI's management.
- Preliminary identification of potential issues.
- Establish the timeline for obtaining the information needed to develop the mission plan.
- Preliminary understanding and analysis of mission-related risks as identified by Agency management.

On April 29, 2025, before starting the actual fieldwork, we organized, at ANI's headquarters, a kick-off meeting with the following results:

- Presentation of the team members involved in the project, both TGS and ANI, as well as their responsibilities.
- Mutual agreement for preliminary timetable to carry out the engagement activities, deadlines for execution and reporting for the project.
- Submitting a preliminary information request.
- Mutual agreement for the communication protocol between TGS and ANI teams.

2.2 Developing the engagement plan

Based on the information obtained in the first phase, we identified the areas that are the subject of this engagement (both the main structures of the Agency and the support structures) and evaluated the internal operational workflow and the internal managerial control system in order to achieve effective engagement planning. We developed the engagement plan, on the following structure:

- Establishing and agree the verification techniques used (observation, interviews, analysis, sampling, testing, confirmation).
- Organizing interviews aimed at identifying and understanding specific risks.
- Analyzing the way of making decisions and the activities carried out by ANI during the year 2024 which will be subject to sampling; following this analysis, we agreed together with the Institution's management on the sampling strategy so that the selections subject to verification are relevant for the purpose of this project.
- Monitoring the implementation status of the recommendations formulated as a result of the audit missions performed during previous years.
- Establish together with the relevant staff the format and content of the interview templates.
- Establish the format and content of detailed tests.
- Establish the size sample to be tested for each ANI structure (direction, service, office or compartment, as the case may be)

By the end of the two phases, on May 6, 2025, we delivered the Initial Report to ANI for management for approval. In this report we made a presentation of the verification procedures applicable to each ANI structure, sampling methodology and engagement planning phases. The report was approved without objection by ANI's management and registered with no. 7210/06.05.2025.

2.3 Execution of the engagement plan and performance of verification procedures

During this phase, we carried out the procedures agreed upon with ANI management that included tests and interviews to conclude whether the policies, procedures and systems are compliant with both the national legislation in force and with the best practices in the field.

The verification procedures were performed in several stages:

1. **Sampling:**

In order to obtain audit evidence, in accordance with the International Standards on Related Services (ISRS) - 4400 *Engagements to perform agreed - upon procedures*, based on professional judgment, taking into account the status of the recommendations resulting from the audit of previous years and the specific objectives, as well as the purpose of this project, we determined the audit risk related to ANI's activity and processes and designed the verification procedures in such a way as to ensure that the risk is reduced to an acceptable level. In the process of selecting the sample and exercising professional judgment, we also considered the impact of the relevant recommendations from previous years on the examined population, as well as the assessment of the risk of non-compliance with the procedures in force.

Based on the statistical reports on the specific activities of the National Integrity Agency in 2024, made available to us by ANI's team, we analyzed the situation of the work files (selection basis) that were the subject to the specific ANI activity in 2024, and we determined the stratification criteria of basis of selection and we randomly selected the testing sample, based on the following rule which is consistent with the statistical methodology of previous years and is based on the auditor's professional judgment, agreed with ANI's management:

Total population (number of iterations of control activities)	Sample size*
Over 350	20
52-350	10
13-51	5
5-12	2
1-4	1

** When establishing the sample for the 2 Integrity Inspection services, we took into account a maximum of 20 work files for each of the 2 statuses of the solved and closed cases, and for the cases in progress, considering that the number of files has increased significantly compared to the previous year (an increase in the number of cases in progress of approximately 62% in 2024 compared to 2023) and taking into account that the number of inspectors has decreased in 2024 compared to 2023, we considered, based on our professional judgment, to increase the sample for cases in progress from 20 to 31 files, as the main activity of the institution is carried out within these integrity services.*

The sampling methodology was agreed by the Agency's management, for each structure, as part of the Initial Report and detailed tests were applied on the selected sample.

2. **Verification of the performance of managerial tasks by Agency's management** based on the selected sample:

- Verification of compliance with operational procedures (formalization and observance of the procedural flow; use of standard documents defined in the procedural framework; documentation of analysis and evaluation indicators).
- Analysis of the effectiveness of ANI's organization in relation to set objectives.
- Verification of the communication system within ANI.
- Analysis of the management decisions and instrumentation process.

- Monitoring the functioning / performance of ANI's management, in compliance with the principles of forecasting, organization, coordination, management and internal control.
 - Analysis of the manner in which managerial attributions are being fulfilled by ANI's management as well as verification of the existence, performance and efficiency of managerial controls.
3. **Staff workload analysis**, respectively the analysis of the adequacy of the allocated resources compared to workload.
4. **Organizing interviews with key staff from all ANI structures to assess the level of compliance of the specific activities carried out with the operational procedures, norms, internal regulations and legislation in force**, respectively we have organized interviews with key staff from ANI structures, in accordance with the organizational structure in force for 2024.
5. **Assessing the adequacy and operational effectiveness of the IT system's general controls**.

Review of the IT systems for audit purposes to assess the extent to which IT systems meet the needs resulting from the specific tasks that ANI has to perform, including from the point of view of security environment.

6. **Stages of the management quality assessment procedure**, respectively the verification of the existence and adequacy of the following elements:
- Reporting chart
 - Decision-making process at Agency level
 - The circuit of documents
 - System and operational procedures
 - Attributions and responsibilities, delimitations and delegations of competence, diagrams of relations, clearly formulated in the Organization and Functioning Regulations as well as in mandated contracts signed by managers of the Agency in the year 2024.
 - Adherence to the random allocation principle as it applies to the distribution process to each integrity inspector for the evaluation of work files.
 - Compliance with the deadlines for completion of the work

At the same time, the following aspects were included while performing our verification procedures:

- Understanding and knowledge of internal rules and procedures, respectively we have analyzed and familiarized ourselves with:
- ✓ ANI Organization and Functioning Regulation (hereinafter referred to as ROF), approved by Order of the President of ANI no. 1822/18.01.2023, valid until 11.09.2024.
- ✓ ANI Organization and Functioning Regulation (hereinafter referred to as ROF), approved by the Order of the President of ANI no. 14645/11.09.2024, valid from 11.09.2024.
- ✓ Provisions included in Law no. 144 of May 21, 2007, regarding the establishment, organization and functioning of the National Integrity Agency, republished, with subsequent amendments and additions.
- ✓ Provisions included in Law no. 176 of September 1, 2010, regarding integrity in the exercise of public functions and dignities, for the amendment and completion of Law no. 144/2007

regarding the establishment, organization and functioning of the National Integrity Agency, as well as for the modification and completion of other normative acts, with subsequent modifications and additions.

- ✓ Provisions included in Law no. 161/2003 of 19 April 2003 on some measures to ensure transparency in the exercise of public dignity, public functions and in the business environment, prevention and sanctioning of corruption, with subsequent amendments and completions.
- ✓ Provisions of Law no. 184/2016 regarding the establishment of a mechanism to prevent conflicts of interest in the procedure for awarding public procurement contracts.
- ✓ Provisions of Law no. 105 of July 9, 2020, to supplement Law no. 176/2010 regarding integrity in the exercise of public functions and dignities, for the amendment and completion of Law no. 144/2007 regarding the establishment, organization and operation of the National Integrity Agency, as well as for the modification and completion of other normative acts.
- ✓ Provisions of Law no. 115 of October 16, 1996 - for the declaration and control of the assets of dignitaries, magistrates, people with management and control functions and civil servants, with subsequent amendments and completions.
- ✓ Provisions of Law no. 361 of December 16, 2022, regarding the protection of whistleblowers in the public interest.
- ✓ Provisions of Law no. 129/2019 for the prevention and combating of money laundering and the financing of terrorism, as well as for the modification and completion of some normative acts.
- ✓ The provisions of Emergency Ordinance no. 124/2021 regarding the establishment of the institutional and financial framework for the management of European funds allocated to Romania through the Recovery and Resilience Mechanism, as well as for the amendment and completion of Government Emergency Ordinance no. 155/2020 regarding some measures for the development of the National Recovery and Resilience Plan necessary for Romania to access reimbursable and non-reimbursable external funds within the Recovery and Resilience Mechanism, with subsequent amendments and additions.
- ✓ Internal rules and procedures - we identified the responsibilities of each structure, the allocation of tasks, the applicable legislation and the work cycle for the diverse types of work files.
- Verification of primary documents (operational procedures, orders, various reports, etc.), in order to ensure a thorough understanding of terms and conditions of significant importance, both individually and globally, in order to assess their area of applicability
- Specific observation, questioning, confirmation and detail tests.

The details of the elements to be verified were established, on a case-by-case basis using the applicable audit trails and applicable operational procedures manuals.

2.4 Reporting phase

Following the evaluations made in accordance with ISRS 4400, TGS Romania has submitted to ANI's management this factual finding report containing the deficiencies identified regarding internal processes and/or procedures applicable at the Agency's level.

The factual findings are detailed in the next chapter, for each of the structures verified.

3 The stage of implementation of the objectives assumed by the Strategy of the National Integrity Agency 2022-2025

The National Integrity Council approved, by Decision no. 1 of February 10, 2022, "Strategy of the National Integrity Agency 2022 - 2025". At the level of ANI, the Order of the President of ANI no. 3889/15.02.2022 by which ANI's Strategy 2022 – 2025 was approved and, at the same time, to make the Strategy implementation process more efficient, ANI's Strategy Monitoring and Implementation Commission was established. The Order of the President of ANI no. 3889/15.02.2022 regarding the approval of the Strategy of the National Integrity Agency was amended by the Order of the President of ANI no. 27347/10.11.2023, respectively the composition of the Monitoring and Implementation Commission of ANI's Strategy and of the Technical Secretariat of the Strategy implementation was changed. The Order of the President of ANI no. 27347/10.11.2023 was amended by the Order of the President of ANI no. 17423/24.10.2024, respectively, both the composition of the Monitoring and Implementation Commission and the composition of the Technical Secretariat for the implementation of the Strategy of the National Integrity Agency were modified. The implementation of the objectives of ANI's Strategy is the responsibility of all departments within ANI, in accordance with the Strategy Action Plan.

We have obtained the Strategy of the National Integrity Agency 2022 - 2025, as well as the Action Plan of the ANI Strategy 2022 - 2025. ANI's Strategy 2022 - 2025 was structured in 7 areas of activity: (1) Evaluation and consolidation of the legislative integrity framework; (2) Evaluation of integrity incidents; (3) Prevention of integrity incidents; (4) Communication and awareness; (5) Administrative capacity; (6) National cooperation; (7) International relations and includes 31 objectives.

The action plan of ANI's Strategy 2022 – 2025 details each of the 31 assumed objectives, the deadlines, responsible, financial resources, risks, deliverables.

We followed the implementation stage of the objectives assumed by the Strategy of the National Integrity Agency 2022 - 2025. Following the procedures carried out, we found that the level of implementation of the objectives of the ANI Strategy 2022 – 2025, with a deadline of December 31, 2024, or permanently, is 96%, respectively 25 of the 26 objectives with a deadline of completion by December 31, 2024 or with a set deadline, have been implemented or partially implemented. From the total 31 objectives assumed by the program document, which also include objectives with a deadline of 2025, 81% of the objectives have been implemented or partially implemented by December 31, 2024.

Total number of measures	Implemented	Partially implemented	Not implemented or not applicable on 31.12.2024
31*	18	7	6

**We note that 26 objectives have an implementation deadline of December 31, 2024, or with set deadline.*

A detailed analysis of the progress related to the objectives assumed by the Strategy of the National Integrity Agency 2022 - 2025 can be found in Annex 1 to the report.

4 Remediation status for deficiencies identified during the verifications performed prior to the year 2024

Following the tests performed, the statistics on the status of remediation of deficiencies identified prior to the year 2024, are presented below:

Structure	Total recommendations	Stage		
		Implemented	Partially implemented	Not implemented
Integrity Inspection Services (2 services)	12	5	5	2
Analysis and Prevention Department	1	-	1	-
Directorate of Public Interest Whistleblowers	2	-	-	2
Contentious Department and Advisory and Legislation Department	2	-	2	-
Communication, Public Relations and GDPR Department	3	-	2	1
Implementation, Structural Funds, Studies and Strategies Department	1	1	-	-
Human Resources Department	2	2	-	-
Labor Protection Department	1	1	-	-
Procurement, Implementation and Archive Department	4	-	1	3
Accounting, Finance and Investments Department	1	-	1	-

Structure	Total recommendations	Stage		
		Implemented	Partially implemented	Not implemented
Internal Public Audit Department	2	2	-	-
Registry Department	2	-	1	1
Internal managerial control system	4	-	2	2
Information Technology Department	9	3	5	1
Total	46	14	20	12

For details on the corrected/partially corrected deficiencies, see Chapter 5 Verification methods and techniques specific to each area verified in 2024.

5 Working methodologies specific to each area verified in 2024

5.1 President, Vice-President and Secretary General

The National Integrity Agency is an autonomous administrative authority that operates at the national level, with a unique structure, and that acts according to the principle of operational independence. The legal framework for carrying out ANI's activity is regulated by the following normative acts:

- Law no. 144/2007 regarding the establishment, organization and operation of the National Integrity Agency, republished, with subsequent changes and additions,
- Law no. 176/2010 regarding integrity in the exercise of public functions and dignities, for the amendment and completion of Law no. 144/2007 regarding the establishment, organization and operation of the National Integrity Agency, as well as for the modification and completion of other normative acts, with subsequent modifications and additions,
- Law no. 184/2016 on the establishment of a mechanism to prevent conflicts of interest in the procedure for awarding public procurement contracts,
- Law no. 361/2022 on the protection of whistleblowers in the public interest,
- Law no. 129/2019 for the prevention and combating of money laundering and the financing of terrorism, as well as for the modification and completion of some normative acts.

In accordance with Law no. 144/2007 on the establishment, organization and operation of the National Integrity Agency, the Agency's management is ensured by a President and a Vice-President, appointed by the Romanian Senate, based on a competition organized by the National Integrity Council.

In accordance with the Decision of the Romanian Senate no. 89/2021, the President of ANI was appointed for a 4-year term, following the completion of the job competition examination for the position of the President of ANI organized between June 14 - 24, 2021. The Vice-President of ANI was appointed by Decision of the Senate of Romania no. 174/December 19, 2022, for a 4-year mandate, following the completion and validation of the job competition for the position of Vice-President of ANI, organized between December 5 and 12, 2022.

At the Agency level, the General Secretary of ANI, who coordinates the activities established according to the organizational structure of the Agency and fulfills other duties delegated to him by the president of ANI, is appointed to the position by the Prime Minister's Decision no. 7/2016.

The attributions of ANI's management provided in the ANI Organization and Functioning Regulation (thereafter „ROF”) were analyzed and interviews were organized with ANI's management to analyze the compliance of the practical activity with the provisions of the ROF.

At the level of 2024, no discrepancies were found between the practical activity and the provisions of the ROF regarding the positions of President, Vice-President and Secretary General.

5.2 General Directorate of Integrity Inspection

The Integrity Inspection operates at the level of the general directorate, having under subordination the Integrity Inspection Directorate. The Analysis and Prevention Department and 2 services of the Integrity Inspection work under authority of the Integrity Inspection Directorate. According to the organizational chart of ANI, the General Directorate of Integrity has allocated a total number of 55 job positions (public managerial and execution public positions). At the end of 2024, out of the 55 positions approved at the level of the General Directorate for Integrity Inspection, 30 positions were filled, and 25 positions were vacant or temporarily vacant. So, the occupancy rate at the level of the General Directorate of Integrity Inspection was low, respectively 54.55%. At the level of the execution public function with special status (integrity inspector), out of the 50 approved positions, 26 positions were occupied at the end of 2024, so that the occupancy rate at the level of integrity inspectors was low, respectively 52%.

5.2.1 Integrity Services (2 services)

At the level of the 2 integrity services, integrity inspectors mainly carry out evaluation activities that are subject to Law no. 176/2010 on integrity in the exercise of public functions and dignities, for amending and supplementing Law no. 144/2007 on the establishment, organization and functioning of the National Integrity Agency, as well as for the modification and completion of other normative acts, with subsequent amendments and additions, as follows:

- ✓ the assessment activity of the declaration of assets, data and information regarding the existing assets, as well as the existing patrimonial changes made during the exercise of public functions or dignities.
- ✓ the activity of evaluating compliance with legal provisions regarding conflicts of interest during the performance of public functions and dignities.
- ✓ the activity of evaluating compliance with the legal provisions regarding the legal regime of incompatibilities during the performance of public functions and dignities.

In addition to the main activities, the integrity inspectors within the 2 services also carry out the following activities:

- ✓ the activity of ascertaining and sanctioning contraventions.
- ✓ the activity of resolving petitions addressed to ANI, regarding possible violations of the legal regime of the declaration of assets, conflicts of interests and/or incompatibilities, as well as regarding the incidence of confidentiality clauses of information from the declaration of assets or interests.

Considering the responsibilities of the Integrity Inspection established by the ANI Organization and Functioning Regulation, approved by ANI President's Order no. 1822/18.01.2023 (valid until 11.09.2024) and by ANI President's Order no. 14645/11.09.2024 (in force from 11.09.2024), as well as by Law no. 176/2010 on integrity in the exercise of public functions and dignities, for the amendment and completion of Law no. 144/2007 on the establishment, organization and functioning of ANI, we proceeded to analyze the compliance of the practical activity carried out within the 2 services of the Integrity Inspection. The analysis also concerned the compliance of the operational procedures applicable at the level of integrity services in 2024 with the applicable legislation.

In order to evaluate the managerial actions within the 2 services of the Integrity Inspection, a sample of work files was selected following the reasoning presented below:

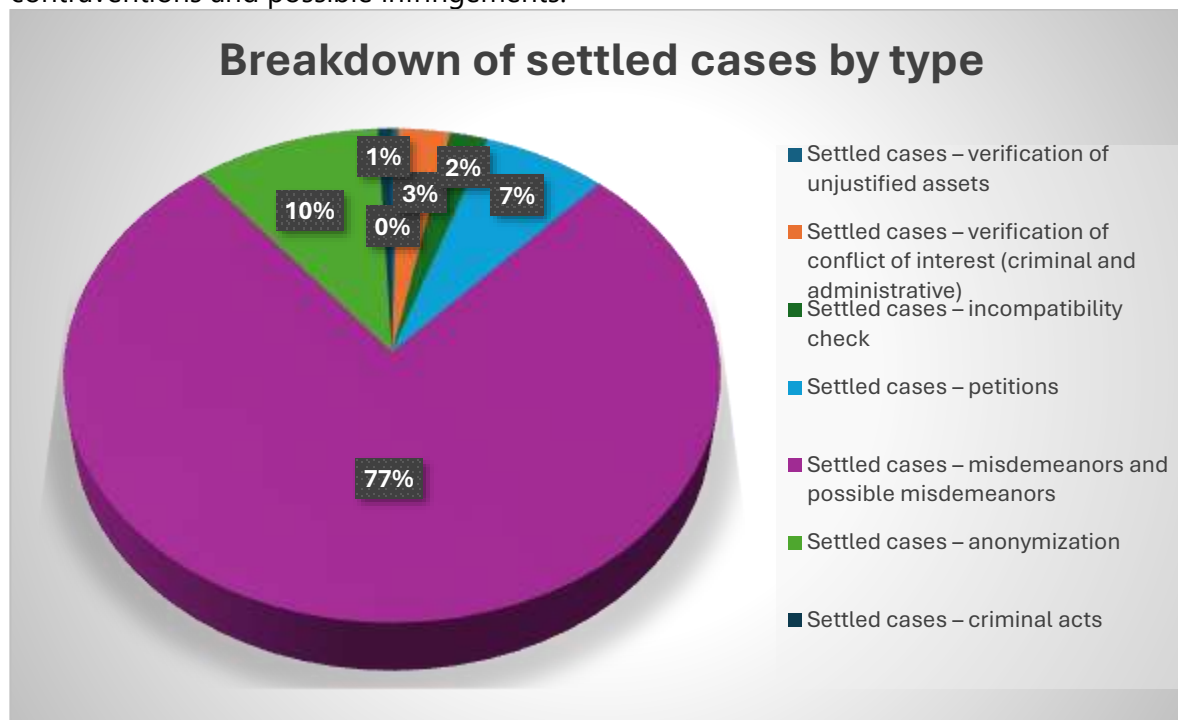
1. We requested a statistical summary regarding the number of work files verified by ANI on 31.12.2024, detailed by type of work (assets, conflict of interests, incompatibility, possible contraventions, contraventions, anonymizations and petitions) and by each of the 3 statuses (settled, closed and in progress);
2. Based on the statistics and professional judgement exercised regarding the related risk and the specifics of the Integrity Inspection's activity, the size of the sample subject to analysis was determined: namely 20 work files for each of the 2 statuses (settled and closed) and 31 work files in progress. In the process of selecting the sample and exercising professional judgment, we also considered the impact of the relevant recommendations from previous years on the examined population, the significant increases in works compared to the previous year, as well as the assessment of the risk of non-compliance with the procedures in force;
3. We requested the list of work files that were the subject to the evaluation procedures of the 2 integrity services in 2024;
4. Based on the list of work files, we randomly selected the sample work files subject to our detailed review.

Based on the audit rationale described above, we selected a sample of 71 work files, distributed as follows among the work categories:

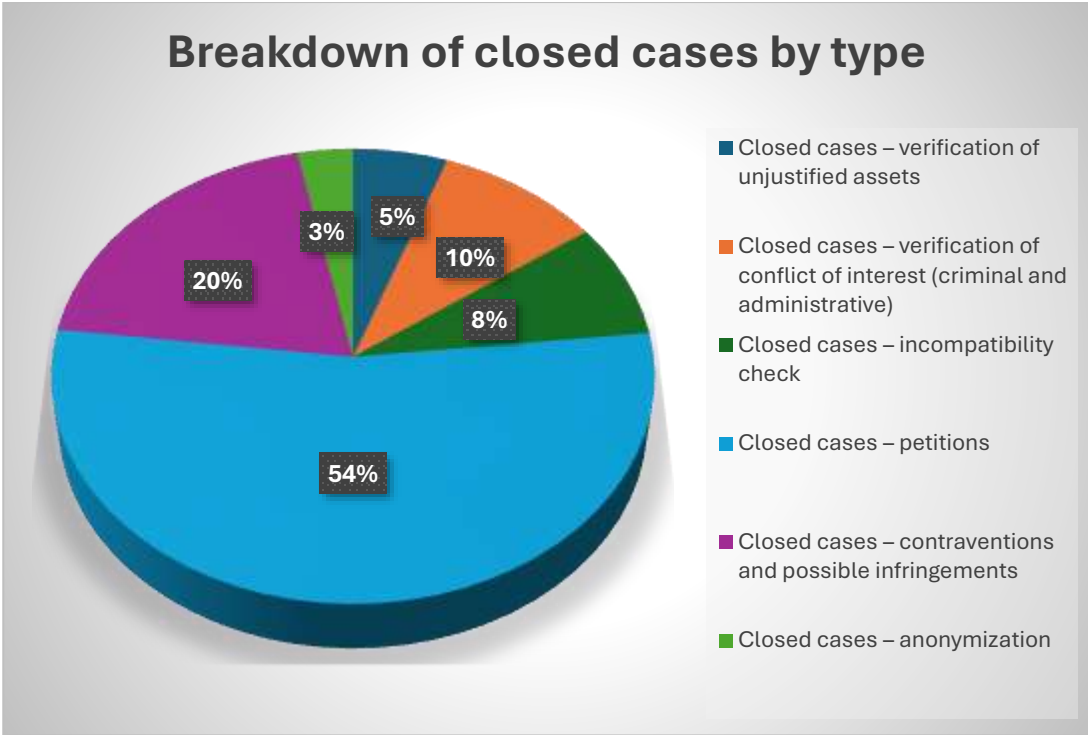
Type of work files Integrity Inspection in 2024 (January 1 – December 31, 2024)	Number of works	Sample size
SETTLED CASES	1180	20
Settled cases – verification of unjustified assets	4	1
Settled cases – verification of conflict of interest in administrative matters	33	3
Settled cases – incompatibility check	24	2
Settled cases – contraventions and possible infringements	913	6
Settled cases – criminal facts	9	1
Settled cases – anonymization	118	4
Settled cases – petitions	79	3
CLOSED CASES	1237	20
Closed cases – verification of unjustified assets	69	2
Closed cases – verification of conflict of interest in administrative matters	119	3
Closed cases – incompatibility check	101	3
Closed cases – contraventions and possible infringements	245	4
Closed cases - anonymization	40	2
Closed cases - petitions	663	6
CASES IN PROGRESS	5591	31
Cases in progress – verification of unjustified assets	1000	6
Cases in progress - conflict of interest verification	1351	6
Cases in progress - checking for incompatibility	977	6
Cases in progress – contraventions and possible infringements	1141	6

Type of work files Integrity Inspection in 2024 (January 1 – December 31, 2024)	Number of works	Sample size
Cases in progress - anonymization	166	2
Cases in progress - petitions	956	5

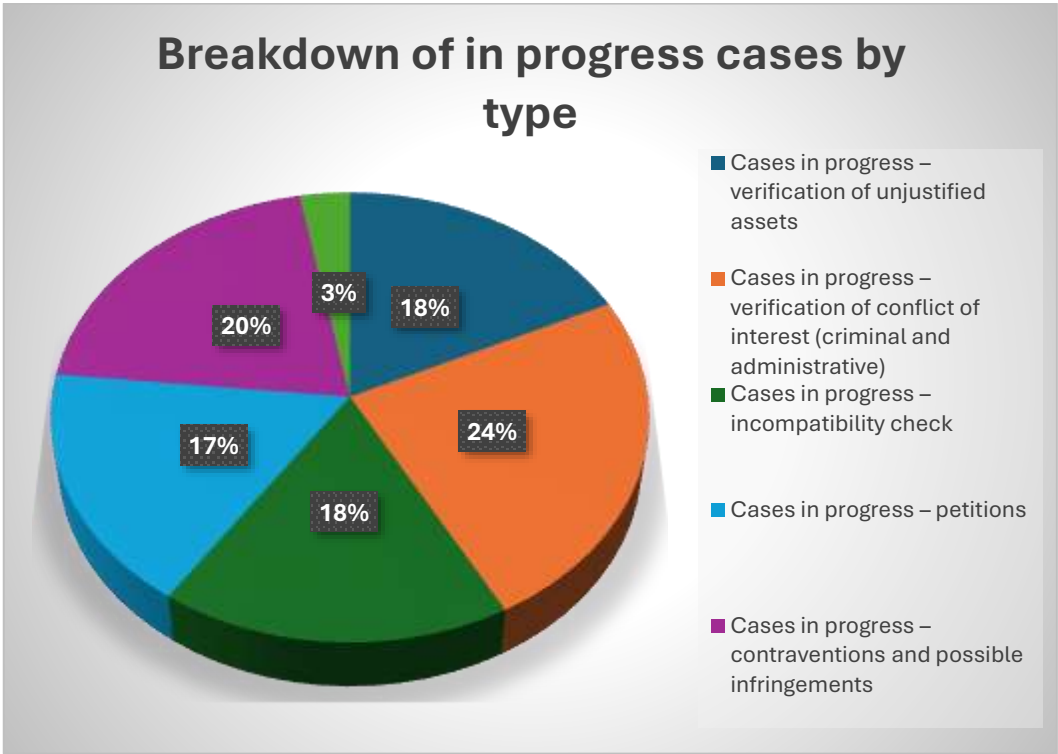
During 2024, the distribution of settled cases by type of work is presented according to the diagram below. We noted that out of the settled cases 77% have as their objective contraventions and possible infringements:



Regarding the closed cases in 2024, 54% of the total closed cases refer to petitions, according to the diagram below:



At the end of 2024, the distribution of cases in progress detailed by type of cases, 24% of the total cases in progress refers to the verification of the conflict of interest, according to the diagram below:



The activity of the Integrity Inspection is standardized and operates based on specific operational procedures, developed in accordance with the specific legislation and the provisions of Order no. 600/2018 on the approval of the Internal Managerial Control Code of public entities, with subsequent amendments and additions. During 2024, the operational procedures specific to the activity of the General Directorate for Integrity Inspection were updated, considering the changes in the organizational structure of ANI.

We have obtained and analyzed the procedures applicable to the Integrity Inspection and proceeded to verify the sample of 71 selected files, in accordance with the procedural process flow described in the operational procedures specific to each process.

In 2024, the average number of integrity inspectors who worked in the 2 integrity services was 22 inspectors (including the heads of services), so that out of the 42 positions related to the 2 services, only 22 positions were occupied on 31.12.2024, the remaining 20 positions being vacant, resulting in a very low occupancy rate, respectively 52.38%.

During 2024, 1 recruitment competition was organized to fill 9 vacant execution public positions with the special status of integrity inspector. The competition was completed in 2025, and 1 integrity inspector was hired, following the completion of the recruitment job testing procedures. Our understanding is that during 2025, the newly hired integrity inspector finished his collaboration with ANI. During 2024, following the completion of the recruitment job testing procedure initiated in 2023 and completed in 2024, 4 new integrity inspectors were hired. However, during the year 2024, 9 employees of the 2 integrity services terminated their service relationship.

Based on the analysis of the statistical situation regarding the activity carried out by each integrity inspector in 2024, provided by the general manager, we have analyzed the workload per inspector at the level of the 2 integrity services. This resulted in an average number of 602 documents drawn up by the integrity inspector, namely addresses, notes (e.g. notes on the result of the consultation of various databases, notes on the evaluation period and the limitation period provided for in art. 11 and art. 25 of Law 176/2010, notes on taking over the file) and minutes of hearings. Compared to the number of integrity inspectors at the end of 2024, respectively 22 inspectors, and taking into account the complexity of the activities performed by the integrity inspectors, as it also resulted from the interviews with the general manager, the heads of services and the integrity inspectors, the workload per inspector is very high, an average number of 151 work files (assets, conflict of interest, incompatibilities) were assigned per inspector on December 31, 2024. We also noted that the integrity inspector's salary level is not sufficiently market competitive to the level of workload and sensitive information they manage.

During 2024, the activity of the integrity inspectors also focused on involvement in the development of projects financed from non-reimbursable external funds, various trainings and participation in various events.

We analyzed the manner in which the process of supervising the activity of integrity inspectors is carried out and we followed the compliance of the supervision process with the provisions of the operational procedure regarding the supervision of the activity of integrity inspectors

(PO – II-14). The General Manager of the Integrity Inspection, the Director of the Integrity Inspection (vacancy on 31.12.2024) and the heads of services regularly monitor the activity of the integrity inspectors, through the existing reporting module in SIMIDAI.

Regarding the evaluation of the declarations of assets and interests submitted through e-DAI, the SAS platform was implemented at the level of the General Directorate for Integrity Inspection, which has led to the streamlining of the activity regarding the identification of cases of non-compliance with the legal provisions on assets, conflict of interest and incompatibilities, other than by referral to the Agency by individuals or legal entities. The SAS platform allows the generation of reports including a series of data and information that support the evaluation of the declarations of assets and interests submitted through e-DAI.

Following our review carried out on the activity from 2024, no new deficiency was identified different from the deficiency made in previous years.

Follow-up on the extent to which the findings identified in the audits prior to the year 2024 were addressed

The following deficiencies have been **remedied**:

➤ Lack of adequate workspace

The lack of adequate workspace that allows the integrity inspector to organize, store and manage the work files in order to minimize the risk of not meeting the deadlines set out in art.11 and art.25 para. (5) of Law no. 76/2010.

In 2024, the process of taking over a new space was completed, especially for carrying out the activity of the Integrity Inspection. The workspace is adequate and allows the Integrity Inspection to carry out its activities in optimal conditions.

➤ Lack of a high-performance IT system

The lack of a high-performance IT system allowing inspectors to prevent the intervention of the prescription terms (imposed by the provisions of art.11 and art.25 para. (5) of Law no. 176/2010, with subsequent amendments and additions) by generating warning messages.

Starting January 2024, through the implementation of the eSIMIDAI application, integrity inspectors, based on the information entered in the work section, receive notifications/alerts that warn them to the date when one of the prescription terms provided for by Law no. 176/2010 is due to occur. Moreover, the prevention of the occurrence of the limitation periods was mentioned as an objective in the performance evaluation of the integrity inspectors, in the sense that the resolution of the works in violation of the two deadlines leads to a significant decrease in the final grade of the performance evaluation of inspectors.

➤ Manual supervision and monitoring process and lack of differentiated allocation for heads of services

The process of supervising the inspectors' activity is carried out by the management of the Integrity Inspection by extracting information from several sections of the SIMIDAI application and manually entering the information in personalized statistics, which impacts the supervision

process. Also, there is no differentiated distribution of the work files, the heads of services, in addition to the supervision and monitoring of the inspectors, have allocated the same number of files as the integrity inspectors.

Starting with January 2024, new random allocation algorithms balanced the evaluation activity performed by department heads, respectively the management and supervision activities of inspectors. System changes and staff turnover have led to an increase in the number of tasks for both inspectors and department heads. In 2024, 10 integrity inspectors ended their service relationship. Based on the new allocation algorithms included in the application, the number of files assigned to department heads is significantly lower, compared to that of the inspectors on duty. In the case of department heads, it has been established that the number of files assigned to them should be half of the maximum score related to the files assigned to an inspector. Furthermore, monitoring of the activity of integrity inspectors by department heads is carried out exclusively through the eSIMIDAI application.

➤ ***Lack of tools for automatic verification of asset and interest declarations in order to streamline the verification activity***

At the level of the General Directorate for Integrity Inspection, we found that the verification of the approximately 900,000 declarations of assets and interests submitted annually is done manually by the integrity inspectors, an activity that does not cover the full verification of the declarations. Currently, the activity of verifying the approximately 900,000 declarations of assets and interests is focused more on verifying compliance with the deadlines for submitting declarations of assets and interests and does not cover all possible situations of violation of the applicable legislation in the field. Considering the fact that, following the amendment of Law no. 176/2010, the declarations of assets and interests are submitted exclusively electronically, through the e-DAI platform, in the process of verifying the declarations of assets and interests we have not identified the use of tools that would lead to the efficiency of the activity of verifying the declarations of assets and interests, both in terms of increasing the number of verified declarations of assets and interests, and from the point of view of identifying and verifying other possible situations of violations of the applicable legislation. The e-DAI application does not currently allow the generation of alerts for possible situations of non-compliance with the specific legislation.

At the level of the General Directorate for Integrity Inspection, the SAS platform was implemented, which led to the streamlining of the activities related to identifying cases of non-compliance with legal provisions on assets, conflict of interest and incompatibilities, other than through reports submitted to the Agency by individuals or legal entities. The SAS platform allows the generation of reports that include a range of data and information to support the evaluation of asset and interests' declarations submitted through e-DAI.

➤ ***Lack of participation of integrity inspectors in training courses specific to their activity***

The process of evaluating assets declarations (data and information regarding the existing assets and patrimonial changes), declarations of interests and compliance with the legal provisions regarding the incompatibility's regime, is a complex process and requires inspectors to have in-

depth and specific knowledge checked areas. We found that the integrity inspectors did not benefit from specific training courses to support them in their work.

In 2024, some of the integrity inspectors participated in the conference "Integrity in the exercise of public functions and dignities", organized in collaboration with the National Institute of Magistracy. The purpose was to promote the exchange of expertise and best practices between judges and prosecutors who are part of the asset investigation committees of each court of appeal, integrity inspectors and legal advisors of ANI. This participation supports integrity inspectors in the asset valuation work.

The following deficiencies were **partially remedied**:

➤ ***Delays in issuing procedural documents***

Following the evaluation of the selected work files, we identified that although the operational procedures in force regarding information request are respected, in some work files there are periods longer than 6 months in which the integrity inspectors did not prepare the evaluation report and the redistribution of the files was not carried out. The delays in the issuance of procedural documents were due both to the constant legislative changes, to the practice of the courts, to the inadequate work space but also due to the fact that in 2020 the activity of the inspectors was carried out predominantly in telecommuting/work at home conditions, in compliance with social distancing imposed by the COVID-19 pandemic, and the database can only be accessed from the office. Also, the supervision process carried out by the heads of services is carried out by extracting some information from SIMIDAI and manually processing the information in various statistics and moreover, the heads of services, in addition to the supervision and monitoring activity of the inspectors, have allocated the same number of works with integrity inspectors, which has a direct impact on the monitoring of works where delays in the issuance of procedural documents could be recorded.

Based on the sample audited for 2024, we identified cases where there were delays in issuing procedural documents. Following the interviews with integrity inspectors, the heads of services and the general director, we noted that the delays were due to the very high workload and heavy caseload of the integrity inspector. Regarding the supervision and monitoring activity carried out by the heads of services, starting with January 2024, the eSIMIDAI system was implemented, providing a new concept of random allocation and eliminating the possibility that existed in the previous version of the application where, for example, only a certain category of inspectors received cases of possible contraventions, while others only received cases of contraventions and did not allow for a balanced random allocation with two or three evaluation objects. Based on the new distribution algorithms included in the application, the number of files assigned to the heads of services is significantly lower than that assigned to inspectors on duty. However, the level of workload per inspector is high, complemented by the fact that in 2024, 9 integrity inspectors from the 2 services terminated their service relationship. In the case of the heads of services, it was established that the number of cases assigned to them should be half of the maximum number of files that an inspector has. The new eSIMIDAI simplifies the monitoring activity carried out by the heads of service, given the fact that a series of notifications are issued by the application that allow the integrity inspector to follow the procedural steps/avoid the occurrence of the limitation periods regulated by Law no. 176/2010, as subsequent amendments and additions.

➤ **The workload per inspectors is high**

The workload per inspectors is high in relation to the volume of activity and the types of activities performed by inspectors (petitions, possible contraventions, contraventions, support to the legal counselors during representation before courts of law for the contested cases), the level of vacancies at the level of the Integrity Inspection being below 50% at the end of 2020.

During 2024, one recruitment job testing procedure was organized to fill 9 vacant public execution positions with special status as integrity inspector. The recruitment job testing procedure was completed in 2025, and following its completion, one integrity inspector was hired. Our understanding is that in 2025, the newly hired integrity inspector ceased his collaboration with ANI. During 2024, following the completion of the recruitment procedure initiated in 2023 and completed in 2024, four new integrity inspectors were hired. However, during 2024, 9 employees terminated their employment relationship. Compared to the number of integrity inspectors at the end of 2024, respectively 22 inspectors, and taking into account the complexity of the activities carried out by the integrity inspectors, as revealed in interviews with the general manager, heads of services and integrity inspectors, the workload per inspector remains very high, with an average of 151 cases (assets, conflict of interest, incompatibilities) were allocated per inspector as of December 31, 2024.

Distinct from the average number indicated above, it has resulted that the workload is much higher if we consider the cases registered as petitions, possible contraventions, contraventions, anonymizations and information that are managed through SIMIDAI. Also, the activities carried out by the integrity inspectors include the real-time management of requests sent to the e-mail address: completaredai@integritate.eu, as well as presentation at events organized by public institutions/authorities on the topic of compliance with legislation on how to complete the declaration of assets and the declaration of interests, incompatibilities and conflicts of interest. During 2024, the activity of the integrity inspectors also covered the following:

- ✓ Involvement in the evaluation missions carried out in the context of Romania's accession process to the Organization for Economic Co-operation and Development (OECD);
- ✓ Involvement in projects financed by non-reimbursable external funds from the National Recovery and Resilience Plan;
- ✓ Training of approx. 362 people on the legal regime of incompatibility and conflicts of interest, as well as on the submission of declarations of assets and interests.

We also noted that the salary level of the integrity inspector is not market competitive considering their workload and sensitive information they manage.

➤ **Constant legislative changes impact the activity of integrity inspectors**

Constant legislative changes impact the activity of the integrity inspectors because with each legislative change, integrity inspectors proceed to identify the files in their portfolio that could be affected, and respectively to prioritize them in such a way as to reduce the impact on the activity of the National Integrity Agency.

One of the objectives of the project "NIAct - Updating the legislation in the field of integrity and providing support to the authorities and depositors in the transition to the digital declaration of assets and interests", financed by the Administrative Capacity Operational Program, is to update the legal framework for the prevention and sanctioning of conflicts of interest, incompatibilities and unjustified assets;

During 2023, related to the standardization of the application of integrity rules, multiple rounds of consultations were organized with the representatives of the authorities and public institutions concerned. The points of view submitted by the participants in the consultations were integrated into the new legislative draft. At the same time, in November 2023, a debate was organized on the proposed normative act, to which key institutions from the central level were invited and participated, and opinions were formulated regarding the key points of the proposed legislative changes and the legislative needs of Romania were debated. In this sense, substantiation notes were developed for the proposals to amend the legislation in force, also considering the proposals submitted by the authorities and public institutions consulted following the three rounds of consultation meetings. The draft normative act contains changes regarding situations of incompatibility and conflicts of interest for all categories of functions. A 30-day period was introduced for all categories of functions to be able to generate a situation of incompatibility, and this draft act aligned the sanctions applied as a result of legislation violations.

The draft normative act was sent in December 2023 to the Ministry of Justice as a partner in the project and the legislative draft will be sent to the European Commission in 2024 and will enter the decision-making transparency process.

At the time of the audit mission, no progress had been identified regard to the objective of the project entitled "*NIAct - Updating the legislation in the field of integrity and providing support to the authorities and depositors in the transition to the digital declaration of assets and interests*".

➤ ***Lack of a special status of the integrity inspector***

The lack of a special status of the integrity inspector leads to a low level of occupancy of the job positions within the 4 integrity services. Although several employment exams were organized in recent years, it was noted that the level of employment occupancy was low. Based on the analysis of the employment exams organized in previous years, a minimum degree of interest in participating in the organized exams was noted, the causes being, on the one hand, the non-competitive financial benefits for the positions compared to the complexity of the work, and, on the other hand, lack of an act that clearly regulates the special status of the Integrity Inspector, as defined by Law 176/2010, with subsequent amendments and additions.

In 2023, the National Integrity Agency took steps to develop a normative act to regulate the special status of the integrity inspector. In this sense, discussions were held at the Ministry of Justice, a draft of the status of the integrity inspector was sent and working groups were organized with representatives of the two institutions. However, at present, there is no regulated framework for integrity inspectors, which leads to the demotivation of integrity inspectors and a difficult recruitment process, given that the salary differences between integrity inspectors and administrative staff are insignificant.

➤ ***Lack of a functional module on Jurisprudence***

At the level of the Integrity Inspection Directorate there is no Jurisprudence module/manual in which all the cases encountered in the practical daily activity of integrity inspectors are treated and addressed, including all decisions/judgments issued by the courts, which would allow the inspector to have an integrated common vision and consistent view on the analyzed case, and in the future if similar cases happen to be treated in a similar way.

In 2024, no manual/collection of relevant cases was developed to centralize the cases encountered at the ANI level, including from the perspective of court decisions. However, to support the activity of integrity inspectors, access was created to the jurisprudence module managed by the General Directorate for Legal, Public Relations, Communication and Human Resources.

The following deficiencies **were not remedied**:

➤ **86% of the number of cases resolved in 2023 are cases of contraventions and possible infringements.**

At the level of the General Directorate of Integrity Inspection, the assessment activity is represented by the assessment of declarations of assets and interests, assets, incompatibilities and conflicts of interests. Following the audit activity carried out, we found that the highest percentage of the settled cases are the possible contraventions and contraventions file cases in which activities are carried out to verify the compliance with the deadline for submitting the declarations or the non-mention of the realized incomes of the examined persons, an aspect that leads to poor prioritization of specific activities.

According to art. 29 para. (1) from Law no. 176/2010: "Non-submission of asset declarations and declarations of interests within the terms provided by this law, as well as non-declaration, in the declaration drawn up according to annex no. 1, of the amount of realized income, or declaring them with reference to other documents constitutes a contravention and is sanctioned with a fine from 50 lei to 2.000 lei." Also, according to art. 30 of the same normative act "The detection and sanctioning of the contraventions provided for by this law are done by the authorized persons within the Agency, according to the provisions of Government Ordinance no. 2/2001 regarding the legal regime of contraventions (...)." Government Ordinance no. 2/2001 regarding the legal regime of contraventions regulates the fact that: "The violator can pay, within no more than 15 days from the date of handing or communication of the report, half of the minimum fine provided by the normative act (...)"

In conclusion, regardless of the amount of the contravention sanction applied, the violator can pay half of the minimum fine provided by law, namely 25 lei, an instrument that cannot lead to holding the depositor responsible since the amount of the fine is so insignificant.

In 2024, no steps were taken to amend Law 176/2010 regarding the amount of the contravention sanction provided for in art. 29, primarily by exempting situations of violation of Law no. 176/2010 from the provisions of the Government Ordinance no. 2/2001 on the legal regime of contraventions.

➤ **Lack of efficient equipment used in the activity of integrity inspectors**

In the process of representing the National Integrity Agency before the courts, the integrity inspector communicates to the legal advisor all the documents that form the basis of the contested evaluation report, for each procedural stage, with the aim of the legal advisor formulates a written defense. The effort to prepare and scan all the documents required by the courts is significant, with the integrity inspector consuming significant time in preparing and scanning tens of pages of documents. We note that the equipment used in this process is not sufficiently efficient, an aspect that complicates the process of document preparation, requiring

a longer preparation time, and puts a lot of pressure on the human resources involved in the execution of this process.

In 2024, no equipment was purchased to support the process of preparing the documents required by the courts.

5.2.2 Analysis and Prevention Department

The Analysis and Prevention Department functions under the provisions of Law no. 184/2016 regarding the establishment of a prevention mechanism for conflicts of interest in the procedure of awarding public procurement contracts and in compliance with the provisions of Law no. 176/2010 on integrity for the exercise of public functions and dignities, for amending and supplementing Law no. 144/2007 regarding the establishment, organization and functioning of the National Integrity Agency, as well as for the modification and completion of other legislation.

The Analysis and Prevention Department coordinates the activity related to utilization of the integrated information system for the prevention and identification of potential conflicts of interest, named "PREVENT - Prevention System". The system aims to prevent conflicts of interest by establishing a mechanism for ex-ante verification, to exclude situations that may generate conflicts of interest. Targeted procedures are public procedures regulated by Law no. 98/2016 on public procurement, as well as sectoral procurement procedures regulated 22 / 107 by Law no. 99/2016, initiated through the electronic public procurement system, and prevention activity is organized without affecting the respective procedures.

From the point of view of the Agency's internal regulatory framework, the Operational procedure for preventing conflicts of interest in the process of awarding public contracts (PO- II-15), revised in 2024, is the one that defines the process of verifying public procurement procedures initiated through the electronic public procurement system, in order to prevent conflicts of interest and other suspicions of irregularities.

Thus, in view of evaluating the management actions within the Analysis and Prevention Department, a sample was selected based on the following procedure, agreed upon with ANI's management:

- ✓ A request was made for the statistics regarding all public procurement procedures published in SICAP, that were automatically transmitted to PREVENT system in 2024.
- ✓ The size of the sample subject to analysis was determined.
- ✓ The sample of procedures subject to testing was randomly selected.

Following the implementation of the methodology presented above, the result was a sample consisting of 5 public procurement procedures out of a total of 19 procedures that were reviewed by the Analysis and Prevention Department in 2024 and for which the PREVENT system generated a notification regarding the existence a potential conflict of interest. We noted that during the period January - December 2024, to prevent conflicts of interest situations, ANI analyzed through the PREVENT computer system a number of 19.592 public procurement procedures, with 19 integrity warnings being issued in the amount of 396 million lei.

The sample testing methodology was developed based on our understanding and evaluation of the operational procedures of Law no. 184/2016 regarding the establishment of a mechanism to prevent conflicts of interest in the procedures for awarding public procurement contracts, as well as based on the functionality of the PREVENT system.

We have analyzed the content of the operational procedure regarding the verification and prevention of conflict of interests in the procedures to award public procurement contracts, in order to understand the workflows and internal processes at the level of the Analysis and Prevention Department and to determine the relevant criteria for the sampling stratification. Through the interviews conducted with the head of the Analysis and Prevention Department, we were able to analyze the level of compliance of the workflows compared with the existing internal procedural framework in 2024.

In 2024, the average number of integrity inspectors who worked in the Analysis and Prevention Department was 10 (including the head of department), so that of the 11 positions, 10 were occupied as of December 31, 2024, with an occupancy rate of 90.90% at the department level.

Following our review carried out on the activity from 2024, no new deficiency was identified.

Follow-up on the extent to which the findings identified in the audits prior to the year 2024 were addressed

The following deficiency was **partially remedied**:

➤ The need to improve the PREVENT IT system

Currently, the PREVENT IT system does not operate at full capacity and does not allow direct access to the data and information held, both by ANI, e-DAI, and by other institutions. The IT infrastructure dedicated to the PREVENT system is subject to wear and tear, and the databases with which the system interconnects (the Integrity Form to be completed in SEAP/SICAP, DEPABD and ONRC) are not always functional or are not sufficient. To investigate possible conflicts of interest in the matter of public procurement, currently, different databases and information are accessed separately, which leads to obtaining disparate and time-consuming information.

At the level of ANI, the project entitled "Development of the PREVENT system in order to increase the interoperability of the electronic systems of public institutions for the ex-ante verification of conflicts of interest in the public procurement process" is being implemented, financed by the Recovery and Resilience Mechanism, within the Non-competitive Call for Projects – code: PNRR/2022/C.7/I.4/1, carried out by the Ministry of Justice as coordinator of reforms and investments. The overall objective is to upgrade the PREVENT IT system, which is designed to verify ex-ante potential conflicts of interest in public procurement procedures carried out through SEAP/SICAP, by switching to a BIG DATA intelligent IT platform. The estimated completion date for the project is May 17, 2026. The procurement for the development and implementation of the PREVENT IT system was published in SEAP on December 19, 2024, with a deadline for submitting bids on February 17, 2025.

5.3 Directorate of Public Interest Whistleblowers

The Public Interest Whistleblower Directorate (hereinafter "DAIP") is a new, distinct structure, subordinated to the President of ANI, established in accordance with the provisions of Law no. 361/2022 on the protection of whistleblowers in the public interest. The Public Interest Whistleblowing Service operates within the structure of the Public Interest Whistleblower Directorate.

DAIP carries out its activity by reporting to the legislative framework, as defined by Law no. 361/2022 regarding the protection of whistleblowers in public interest. Considering the attributions of the Public Interest Whistleblower Directorate established by the ANI Organization and Functioning Regulation, approved by ANI President's Order no. 1822/18.01.2023 (valid until 11.09.2024) and ANI President's Order no. 14645/11.09.2024 ((in force from 11.09.2024), as well as by Law no. 361/2022 regarding the protection of whistleblowers in the public interest, we proceeded to analyze the conformity of the practical activity carried out within DAIP.

Through the ANI Organization and Functioning Regulation issued on 04.09.2024, approved by Order 14645/2024, in force from September 11, 2024, published in the Official Gazette, Part I no. 916 of September 11, 2024, the attributions of DAIP were revised, in accordance with the Law no. 361/2022 on the protection of whistleblowers in the public interest, with subsequent amendments.

From the point of view of the Agency's internal regulatory framework, the Operational Procedure regarding the protection of whistleblowers in the public interest (PO-DAIP-01), developed in 2023, revised in 2024, is the one that defines the specific activities carried out by DAIP staff. In order to evaluate the managerial actions within DAIP, a sample of work files was selected based on the following method agreed with ANI's management:

1. The statistical summary regarding the number of working files examined by ANI in 2024 was requested, detailed by settled cases, closed cases and cases in progress as of 31.12.2024.
2. Based on the statistics and professional judgement related to the relevant risk, and the specifics of the activity of the Public Interest Whistleblower Directorate, as well as bearing in mind that this year is the second year of the DAIP activity, the size of the sample subject to testing was determined.
3. The list of work files that were the subject of the evaluation procedures of the Public Interest Whistleblower Directorate in 2024 was requested.
4. Based on the list of files, the sample of files subject to our review was randomly selected.

In 2024, the Agency received a total of 306 reports, through the available channels, namely: online on the platform, by e-mail, by post and in person at the Agency's headquarters, broken down as follows: 159 anonymous reports and 147 nominal reports. Of the total 306 reports received, 243 reports were closed, 32 reports solved, and 31 reports are in progress.

Following the procedures presented above, a sample of 20 files were selected for our review, as follows:

Type of cases Directorate of Whistleblowers in the public interest in 2024 (January 1 – December 31, 2024)	Number of works	Sample size
Settled cases	32	5
Closed cases	243	10
Cases in progress	31	5
TOTAL	306	20

The sample testing methodology was developed following the understanding and evaluation of the applicable operational procedure of Law no. 361/2022 regarding protection of whistleblowers in the public interest, as well as our understanding of the workflows and internal processes at the DAIP level. For the selected sample, we assessed the degree of compliance with the provisions of the operational procedure and specific legislation.

In addition to the activity of managing and evaluating reports on violations of the law, the integrity inspectors within DAIP also carried out other activities in 2024, as follows:

- The DAIP continued to take steps to identify the public authorities and institutions which, according to the special legal provisions, receive and resolve reports on violations of the law, within their area of competence, as well as the public authorities and institutions to which the Agency submits the reports for competent resolution (approx. 45 entities).
- meetings were organized with people designated with responsibilities for receiving, registering, examining, carrying out follow-up actions and solving reports.
- Verification of the implementation of Law no. 361/2022, as subsequent amendments, by verifying the manner in which public and private entities have established the internal/external reporting channels and established the procedures related to internal/external reporting, as appropriate.
- A total of 236 consultation activities (including confidential consultations) were carried out, benefiting individuals, authorities, public institutions, as well as private legal entities. The consultation activity was carried out in the following ways: by phone, by e-mail, in person at the Agency's headquarters. The aspects subject to the advisory activity concerned the following: the implementation of Law no. 361/2022, with subsequent amendments; counseling on reporting and the classification of the report based on the Law no. 361/2022; consultations on identifying and establishing internal reporting channels; advice on the conditions that a person must meet in order to benefit from the provisions of Law no. 361/2022; advice on reporting, etc.
- holding an information session in September, during a workshop organized by the Constanta Chamber of Commerce, regarding the application of Law no. 361/2022, with subsequent amendments, focusing on the regulatory and enforcement area; reporting methods and common provisions applicable to reports on violations of the law; internal reporting procedure; identity protection applicable to whistleblowers in the public interest, without limitation.
- organization in November 2024 of a round table on the topic of "Law no. 361/2022: the role and responsibilities of the authorities in the protection of whistleblowers in the public interest", with the aim of strengthening the unitary application of the legislation, exchanging best practices and the consolidating inter-institutional collaboration in the field. The event brought together representatives of public authorities and institutions.

- An online workshop on unitary application of the legislation was organized in December. Discussions focused on reporting methods and content, as well as document records, internal reporting channels and procedures, protection measures and counselling, and sanctions. Thus, the Agency sought to raise awareness of the obligations of private legal entities, the power of the competent authorities, the obligations of individuals who report or disclose information on violations of the law, measures to protect them.
- activities related to providing responses requested by institutions/individuals.

According to interviews held with the management of DAIP and based on the documents made available, the activity of DAIP in 2024 was mostly carried out with a number of 6 integrity inspectors. On December 31, 2024, the occupancy rate of the Directorate of Public Interest Whistleblowers was 22.73%, i.e., of the 22 positions allocated according to the state of functions, 5 positions were occupied and 17 vacant. As a result of the competition organized in 2023 and completed in 2024 to fill vacant public positions within DAIP, 2 integrity inspectors were hired, and 1 DAIP director ceased his activity at the end of 2024. The uncompetitive financial benefits compared to the complexity of the work and the lack of a clear act that regulates the special status of the integrity inspector have contributed to maintaining a low number of staff within DAIP. At the same time, we note that in 2024 the predominant type of work carried out by DAIP were closed cases, out of the 306 work files registered and analyzed, 243 work files were classified, respectively a percentage of approximately 79.41%.

Following the verifications carried out on the activity of the Public Interest Whistleblower Directorate in 2024, no new deficiencies were identified.

Follow-up on the extent to which the findings identified in the audits prior to the year 2024 were addressed

The following deficiencies **were not remedied**:

➤ Lack of an integrated IT system

At the level of the Public Interest Whistleblower Directorate, all the records of the registered work files, including the follow-up of the inclusion in the procedural terms, are kept in excel files that are filled in manually by the staff of the department. There is no integrated IT program implemented at the directorate level, which would allow, on the one hand, the predefined generation of the forms/appendices provided for in PO-DAIP-01 and the management of all procedural documents, and, on the other hand, the generation of alerts regarding the reporting deadlines and the monitoring of the work load per inspector by the management of the department, a fact that would facilitate the transparency of the inspectors' productivity at any time.

At ANI level, the project entitled "Development of the PREVENT system in order to increase the interoperability of the electronic systems of public institutions for the ex-ante verification of conflicts of interest in the public procurement process" is being implemented, financed by the Recovery and Resilience Mechanism, within the Non-competitive Call for Projects – code: PNRR/2022/C.7/I.4/1, carried out by the Ministry of Justice as coordinator of reforms and investments. One of the objectives of the project is to create an IT system for receiving and solving reports on violations of the law, designed to support the application of legal provisions

related to the protection of whistleblowers in public interest (according to the provisions of Law no. 361/2022). The estimated completion date for the project is May 17, 2026.

It is relevant to note that in 2025, the procedure for the procurement of an IT system for receiving reports from whistleblowers in the public interest and a software solution for case management and for carrying out counseling, assistance, training and information activities was initiated, in order to support the digitization of operational flows.

➤ ***The number of integrity inspectors is insufficient compared to the complexity of the work performed and the workload***

Following the analysis carried out and the discussions held with the representatives of the Public Interest Whistleblower Directorate, we found that at the level of the Directorate, the degree of employment is very low compared to the complexity of the activities carried out and the workload. At the end of 2023, out of the 22 positions approved at directorate level, only 4 positions were occupied, respectively the degree of job occupancy being approximately 18%.

As a result of the analysis carried out and discussions held with representatives of the Public Interest Whistleblower Directorate, we found that at the level of the directorate, the occupancy rate is very low compared to the complexity of the activities carried out and the workload. At the end of 2024, out of 22 positions approved at the directorate level, only 5 positions were occupied, with an occupancy rate of approximately 23%.

5.4 Legal, Public Relations, Communication and Human Resources General Directorate

Within the Legal, Public Relations, Communication and Human Resources General Directorate (hereinafter "DGJRPCR") operates the Contentious Department, the Advisory and Legislation Department, the Communication, Public Relations and Strategy Department, the Human Resources Department and the Labor Protection Department.

5.4.1 Contentious Department

As part of the external audit, we analyzed the way internal processes are organized and carried out at the level of the DGJRPCR.

According to the information provided by the General Manager of the DGJRPCR, the activity of the Contentious Department is focused, in general, on the activity of drafting documents regarding the institution's defenses before the courts and representing ANI before the courts. However, in the alternative, due to the overloading of the legal advisors within the Advisory Services and Legislation Department, part of the activity of the legal advisors may also refer to the preparation of responses to the requests formulated based on OG no. 27/2002 addressed to ANI.

Based on the statistical summary made available, regarding the files pending before the courts registered during 2024, we randomly selected a sample of 10 legal files from the total of 145 files pending before the courts and registered in the year 2024 proceeded to check conformity of the selected sample, with the provisions of the ROF and of the applicable operational procedures, and we organized interviews with the general director of the DGJRPCR.

Regarding the verification of the selected sample, we did not find any deviations from the applicable procedural provisions.

Regarding the presence of ANI's representatives before the Assets Investigation Commissions and before the courts in the files that have as their purpose the assessment of assets, the provisions of art. 16 of Law no. 115/1996, which specifies the following: "The President of the Court of Appeal or the President of the Administrative and Fiscal Litigation Section, upon receiving the file, sets a trial date, according to the law, and orders the summoning of all the parties who have been summoned to the Agency. The state, through the Ministry of Economy and Finance, will always be summoned to court. The participation of the prosecutor and the National Integrity Agency is mandatory." In addition to the representation in the files that have as their purpose the assessment of the assets, the representation of the institution is ensured in all the files that are on the Bucharest Court of Appeal (substance or appeal) and on the High Court of Cassation and Justice (appeal), regardless of the subject of the file.

Thus, regarding the representation of ANI in the courts and in the Assets Investigation Commissions in the country and Bucharest, during 2024 a total number of 114 trips were made in the country, of which 113 representations in cases regarding unjustified asset (Timișoara, Cluj, Iași, Suceava, Bacău, Craiova, Constanța, Oradea, Alba Iulia, Pitești, Ploiești, etc) and 391 representations in the files located in Bucharest (assets, incompatibilities, conflict of interest).

On 31.12.2024, on the role of the courts (all levels of jurisdiction) there were a number of 414 files (145 registered in 2024 and 269 registered in previous years), in different procedural stages and in which the National Integrity Agency was part of.

Within the Contentious Department, there are 11 positions approved by the state of functions (including the position of head of department), of which at the end of 2024, the number of filled positions occupied was 7 (6 execution staff positions and 1 head of department), and a number of 4 vacant or temporarily vacant positions. The occupancy level at the end of 2024 is 63.64%.

Considering the small number of legal advisers, to ensure the representation of the Agency's interests before the courts, ANI requests in all cases, judgment in absentia, to avoid procedural incidents such as suspension. The physical presence of legal advisors in the courts is necessary in the following two situations:

- ✓ In all cases pending before the High Court of Cassation and Justice, the Bucharest Court of Appeal, as well as within the files that may constitute a precedent of judicial practice.
- ✓ At the Courts of Appeal and at the Assets Investigation Commissions attached to the Courts of Appeals in the country, in the cases that had as their purpose the finding of significant differences (as a result of the assessment of the declaration of assets, the data and information regarding the existing assets, as well as patrimonial changes made during the exercise of public functions or dignities).

Also, during 2024, the legal advisors requested and obtained the issuance of 86 registry certificates with the decision pronounced in the appeal proceedings, which were communicated to integrity inspectors to initiate proceedings for the application of disciplinary/administrative sanctions.

In the context of the complexity of the activities carried out at the level of the Contentious Department, the time spent traveling to ensure the representation of ANI in front of the courts in the files that have as their object the assessment of assets, as well as in all the files pending before the Bucharest Court of Appeal (substance or appeal) and on the role of the High Court of Cassation and Justice (appeal), the workload of legal advisors remains high.

At the level of the Contentious Department, all the records regarding the work carried out are kept in excel files, without an integrated IT system, interconnected with justice portals, that would generate alerts regarding the set court deadlines and the documents issued in the files pending before the courts.

During 2024, a subscription to the Termene.ro platform was purchased, which provides access to the monitoring of up to 500 files pending before the courts. However, the lack of an integrated IT system makes the activity of legal advisors difficult, in the sense that the procedural documents issued in the files pending before the courts are not accessible in real time.

5.4.2 Advisory Services and Legislation Department

As part of the external audit mission, the organization and conduct of internal processes at the level of the Advisory Services and Legislation Department within the Legal, Public Relations, Communication and Human Resources General Directorate (DGJRPCRUC) was analyzed.

The activity of the legal advisers within the Advisory Services and Legislation Department refers to the following activities:

- ✓ Preparing answers to the requests formulated based on O.G. no. 27/2002 regarding the regulation of the activity of solving petitions.
- ✓ endorsement of contracts.
- ✓ endorsement of internal documents within the ANI as well as the addresses sent to different public institutions.
- ✓ providing legal advice to structures within ANI as well as formulating points of view regarding the application of legal norms.
- ✓ elaboration points of view regarding the projects of normative acts, protocols, memoranda, framework collaboration agreements to be approved or signed by the ANI management.

According to the information provided by the General Manager of the DGJRPCRUC, although the activity of the Advisory Services and Legislation Department is focused on carrying out the above-mentioned activities, the legal advisers within the service are assigned (including at the level of job descriptions) legal files in order to formulate objections or other documents for ANI's defense before the courts and even represent the institution before the courts, according to the procedures, in cases where the workload of the legal advisors within the Contentious Department is high and does not permit them to attend those cases.

With strict reference to the preponderant activity of the Advisory Services and Legislation Department, namely the elaboration of responses to the requests formulated on the basis of

OG no. 27/2002, we selected for analysis a sample of 20 responses to requests from the total population of 3207 requests for points of view registered in the year 2024, according to the record made available by the general director of DGJRPCR.U.

As a result of the review carried out on the selected sample of 20 responses to requests, we found that in 13 cases out of the 20 selections, there were delays in providing the response to the petitioner. The recorded delays, according to the discussions held with the director of the DGJRPCR.U, are caused, on the one hand, by the high workload of the legal advisers, and, on the other hand, by the lack of an integrated IT system that would allow document tracking and management, including the initiation of alerts for settlement deadlines. Also, during 2024, another reason that led to delays in sending the response to the petitioners was caused by the technical problems that occurred in the process of replacing the DMS application with a new document registration and integrated management system with Active Directory (REGEN). We did not consider formulating a new finding because we noticed that towards the end of 2024, when the functions of the REGEN application could be used under optimal conditions, the delays in providing the response to the petitioners decreased or were no longer recorded.

Within the Advisory Services and Legislation Department, there are 11 positions approved by the state of functions, of which at the end of 2024, 5 positions were occupied (4 execution staff positions and 1 head of service position), while 6 were vacant or temporarily vacant, the occupancy rate on 31.12.2024 being 45.45%. We note that out of the 4 execution positions occupied, 2 are occupied by legal advisers and 2 individuals are responsible for the secretarial and support activity at the level of the Contentious Department and the Advisory and Legislation Service.

Some of the staff of the two services (4 legal advisers and the general director) were involved in the implementation of projects carried out at Agency level.

Based on the review carried out we note the overlapping of the activities of the two services (Litigation and Approval and Legislation) - legal advisers from the Advisory Services and Legislation Department preparing objections/other requests to the court and vice versa, legal advisers from the Contentious Department formulating answers to petitions - we decided to formulate common deficiencies and conclusions both services.

In conclusion, at the level of the 2 services, in 2024, we analyzed the procedural framework and the degree of compliance in relation to it, based on the test work of selected samples and the interviews carried out, we did not identify any new deficiencies.

Follow-up on the extent to which the findings identified in the audits prior to the year 2024 were addressed

The following deficiencies were **partially remedied**:

➤ ***The number of legal advisers is insufficient compared to the workload and complexity of the activity***

In 2024, in order to increase the occupancy rate at the level of the two services, a recruitment job testing procedure was organized and completed, as a result of which the legal advisor

position was not filled. Also, during 2024, a new recruitment job testing procedure was organized, completed in 2025, through which a position of legal advisor at the Advisory and Legislation Service was occupied in 2025. At the same time, in 2024, a legal adviser was transferred from another institution to the Contentious Department. At the same time, within the Advisory and Legislation Service, a legal advisor terminated his employment relationship in 2024. However, at the end of 2024, the cumulative staff structure, at the level of both services, the Contentious Department and the Advisory and Legislation Service, includes 22 positions, of which 12 positions are occupied (including the heads of services), resulting in an occupancy rate of approximately 54% at the level of both services. In the context of the complexity of the activities carried out at the level of the Contentious Department, the number of files pending before the courts, the time spent on traveling to ensure the representation of ANI before the courts of law in the cases concerning the valuation of assets, as well as in all the files pending before the Bucharest Court of Appeal (first instance or appeal) and before the High Court of Cassation and Justice (appeal), and taking into account the large number of requests for points of view, the workload of the legal advisers remains high. This results in the number of personnel to be, often, insufficient for the timely resolution of current files. Filling the vacant positions would facilitate the performance of the two services in optimal conditions and would ensure the separation of the duties and types of cases corresponding to the two services.

➤ **Lack of an integrated IT system**

All the records regarding the work carried out at the level of the 2 services are kept in excel files, without an integrated IT system, interconnected with the justice portal, which would generate alerts regarding the set court deadlines, the documents issued in the files pending before the courts, notifications regarding the resolution deadlines in the case of petitions, as well as easy access to the jurisprudence related to the Agency's activity. The lack of an integrated computer system complicates the activity of legal advisors from the 2 services, in the sense that the procedural documents issued in the files pending before the courts are not accessible in real time, the process of tracking the deadlines for resolving petitions is done manually by each advisor legal. Delays were registered in drafting the responses to the requests formulated based on OG no. 27/2002 in 4 of the 20 responses to selected requests. The recorded delays, according to the discussions held with the director of LPRCGD, are caused, on the one hand, by the high workload of the legal advisors, and, on the other hand, by the lack of an integrated IT system that allows the management of documents and their tracking in real time, including the initiation of alerts regarding trial/settlement deadlines. At the same time, such a system would be opportune to access also by the integrity inspectors, in order to know at any time the status of the court file, as well as the related jurisprudence, considering that at the time of the preparation of this report, this information is sent exclusively by email to the director general of the Integrity Inspection, the director, as well as to the integrity inspector who issued the disputed evaluation report.

In 2024, two new IT applications were implemented to support the activity of legal advisors, namely:

- TERMENE.RO: access subscription on the "termene.ro" platform with the possibility to monitor up to 600 cases pending before the courts. The application is currently being configured on the desktops of staff within the two services.

- REGEN: an application that allows the registration, allocation and monitoring of petitions and responses to them, with the facility to alert the lawyer to whom the petition has been assigned, who has the possibility to view in the application the number of assigned petitions that have not been opened and, implicitly, worked on.

However, the lack of an integrated IT system leads to delays in the activity of the 2 services.

5.4.3 Communication, Public Relations and Strategy Department

The Communication, Public Relations and Strategy Department comprises the Communication, Public Relations and GDPR Department and the Structural Funds, Studies and Strategies Implementation Department. The Communication, Public Relations and Strategy Department operates under the Legal, Public Relations, Communication and Human Resources General Directorate.

Communication, Public Relations and GDPR Department

The responsibilities of the Communication, Public Relations and GDPR Department are set out in the Organization and Functioning Regulations of the National Integrity Agency. The Communication, Public Relations and GDPR Department activity is standardized and operates based on specific operational procedures, developed in accordance with the provisions of SGG Order no. 600/2018 regarding the approval of the Internal Managerial Control Code of public entities, published in the Official Gazette on May 7, 2018.

We proceeded to verify the compliance of the practical activity of the Department with the procedural provisions, we organized interviews with the representatives of the Department and evaluated through detailed tests, on a sample basis, the following:

- ✓ The factual functioning of the system process for elaborating answers to the requests formulated based on Law no. 544/2001.
- ✓ Compliance of media monitoring activities with the provisions of operational procedures applicable to this process.

With respect to the process of elaborating the answers formulated based on Law no. 544/2001, we performed the following procedures:

- ✓ We selected from the "Register of requests made under Law no. 544/2001", a sample of 10 requests for public information from the 10 requests registered in 2024, to verify compliance with the deadlines established in the applicable operational procedure.
- ✓ We verified the existence, on the Agency's website, of mandatory public information, in accordance with Law no. 544/2001.

To test the media monitoring process, we selected 5 days from the total working days of 2024, for which we checked whether the media monitoring activity was carried out in accordance with the provisions of the operational procedure. We also selected a sample of 5 press releases from the 34 registered in the 2024 Press Release Register.

We obtained the operational and system procedures applicable to each process and evaluated the applicable documentation in terms of periodicity, compliance with legal provisions, authorization, compliance with legal deadlines.

We also obtained ANI's reports to the Ministry of Justice regarding the assessment of the progress made by ANI in the context of the European Commission's assessment of significant developments related to the rule of law, within the National Anti-Corruption Strategy.

Regarding the implementation of the Strategy of the National Integrity Agency 2022 - 2025, we evaluated the implementation process of the objectives established in the Strategy. The evaluation report of ANI's Strategy 2022 – 2025, including the stage of implementation of the assumed objectives can be found in Annex 1 to this report.

Regarding the assessment of personal data processing activities, we examined the applicability of the General Data Protection Regulation no. 679/2016 (hereinafter referred to as the "Regulation" or "GDPR") to determine the categories of personal data processing that fall under the Regulation.

We found that the data regarding the basic activity of the Agency does not fall under the scope of the Regulation, based on art.2. Paragraph 2 letter d) which stipulates that *"this Regulation does not apply to the processing of personal data by the competent authorities for the purpose of prevention, investigation, detection or prosecution of crimes or the execution of punishments, including protection against and prevention of threats to public safety"*.

Within the Communication, Public Relations and GDPR Department, there are 7 positions approved by the state of functions, of which at the end of 2024, the number of occupied positions was 1, with a number of 6 vacant or temporarily vacant positions, the occupancy rate on 31.12.2024 being 14.29%.

At the level of 2024, following the evaluation of the operational procedures and based on the methodology applied, no new deficiency was identified regarding the activity of the Communication, Public Relations and GDPR Department.

Follow-up on the extent to which the findings identified in the audits prior to the year 2024 were addressed

The following deficiencies were **partially remedied**:

- *Technical and organizational measures for data security - no specific mentions regarding the protection of personal data were found. Although technical and organizational measures have been taken that demonstrate compliance with the provisions of the GDPR, following the interviews held with the responsible persons, areas covered by the Regulation have been identified that are not implemented from a technical point of view (the storage period of data/activity logs in systems, implementing the right to be forgotten).*

In the year 2024, we did not notice the full remediation of this deficiency. During 2023, at the Agency level, the implementation of 2 projects with funding through the PNRR, projects that also target the GDPR component, was started, but no progress was made in 2024.

- *At the time of the assessment, after consulting the Agency's updated organization chart, we noticed that the position of Data Protection Officer (DPO) is not distinctly defined in the organization chart.*

There is no legal requirement obliging ANI to have a distinct position for the DPO defined in the organizational chart. However, during 2024, adequate mechanisms were not implemented at the Agency level to ensure the independence of the designated DPO from the activities they evaluate. During 2024, related to the issuance of a new version of the Organization and Functioning Regulation, approved by Order no. 14645/11.09.2024, it now includes the specific duties of the personal data protection process, specified to art. 71 of the ROF. We consider that the Data Protection Officer (DPO) should be appointed from among the staff of the Communication, Public Relations and GDPR Department.

The following deficiency **was not remedied**:

- *In terms of conducting awareness sessions related to personal data protection and information security, the DPO as well as other ANI employees did not participate in training sessions.*

In 2024, ANI employees did not carry out professional training courses in the field of training and awareness on data protection issues.

Implementation of Structural Funds, Studies and Strategies Department

Considering the attributions of the Implementation of Structural Funds, Studies and Strategies Department (hereinafter "CIFSSS"), established by the ANI Organization and Functioning Regulation, we analyzed the compliance of the practical activity carried out within this department, with the procedural provisions and ROF.

Also, from the analysis of the documents made available, the following aspects were addressed:

- ✓ Analysis of the activities carried out within the department in 2024;
- ✓ Understanding the management methodology for these projects which are being financed from non-reimbursable sources and implemented at Agency level.
- ✓ Defining the management process related to identifying national and/or external financing sources.
- ✓ Identification of possible risks and areas of activity in order to increase the efficiency of the activities carried out at the Agency level.

The activities of the department included the following:

- ✓ Identification and assessment of ANI's needs for the realization of project applications, including documentation for submitting applications to access non-reimbursable external funds.
- ✓ Identifying and analyzing opportunities for the application and submission of funding applications for projects, respectively the submission of funding applications for projects with funding from non-reimbursable external sources.
- ✓ Maintaining relations with institutional partners with whom there are ongoing projects (e.g., Transparency International Romania, Ministry of Justice, etc.);

- ✓ Monitoring the implementation of the projects carried out at the Agency level.

Within the National Recovery and Resilience Plan (PNRR), ANI has the role of coordinator of reforms and/or investments under Pillar V – Health and economic, social and institutional resilience; Component 14 – Good governance, Reform 7 – Evaluation and updating of the legislation on the integrity framework. In order to complete milestone 431 regarding the entry into force of the consolidated integrity laws, in 2023, the project "*NIAct - Updating the legislation in the field of integrity and providing support to the authorities and depositors in the transition to the digital declaration of assets and interests*", SIPOCA code 1158, co-financed from the European Social Fund through POCA 2014 – 2020, was successfully implemented.

Also, ANI has the role of beneficiary for 2 other projects that correspond to Pillar II – Digital Transformation, Component 7 – Digital Transformation. These 2 projects aim at the development of the PREVENT system, the development of ANI's technical capabilities to retrieve and process declarations of assets and interests in digital format, as well as the design of a digital awareness and prevention platform regarding the legal integrity framework, respectively:

- ✓ The project "Development of the PREVENT system in order to increase the interoperability of electronic systems of public institutions for the ex-ante verification of conflicts of interest in the process of awarding public contracts", call PNRR/2022/C.7/I.4/1, PNRR/2022/C.14/I.1/1, PNRR/2022/C.14/I.2/1, through the Ministry of Justice, the Agency having the role of Beneficiary, submitted in September 2022, being in implementation since 17.01.2023;
- ✓ The project "Designing a digital awareness and prevention platform through which the relevant stakeholders will be able to clarify, on their own, certain obligations aimed at the integrity framework, which they must respect", call PNRR/2022/C.7/I.4/1, PNRR/2022/C.14/I.1/1, PNRR/2022/C.14/I.2/1 through the Ministry of Justice, the Agency having the role of Beneficiary, submitted in September 2022, being in implementation since 17.01.2023. At the time of the audit, the development of the platform is being testing.

In order to optimally implement Milestone no. 431 of the National Recovery and Resilience Plan - The adoption of the consolidated laws on integrity, the National Integrity Agency launched, in September 2023, the project entitled "*23RO06 Support in implementation of the integrity and anti-corruption framework in Romania, including reducing the risk of corruption in public procurement*". The project is financed by the technical support instrument (TSI) of the European Commission, being developed by ANI, in partnership with the Ministry of Justice and refers to the provision of technical assistance by the Organization for Economic Cooperation and Development (OECD), in order to implement the framework of integrity and anti-corruption in Romania, including risk reduction in public procurement.

The main objectives pursued are:

- Elaboration of a national risk map and an action plan that provides for the reduction of corruption risks in public procurement.
- The formulation of recommendations addressed to Romania regarding the institutional arrangements that must be made for the optimal implementation of the legislative changes in terms of integrity (Milestone 431 of the NRRP).
- Increasing the involvement of public sector organizations to implement the provisions on conflicts of interest, pantouflage and protection of whistleblowers in the public interest.

The results of the project will be coordinated, either by the National Integrity Agency or by the Ministry of Justice, for ANI, the following results from the project being of interest:

- Output 6: Report to support the implementation of the new legal framework on integrity.
- Result 7: Recommendations regarding the improvement of the conflict-of-interest system and the efficiency of the declaration verification process.
- Output 8: Recommendations and guidelines for the implementation of the EU Directive on the protection of public interest whistleblowers.
- Outcome 9: Framework for mitigating the risks of undue influence with a focus on pantouflage.

In 2024, Outcome 8 and Outcome 9 were finalized through the preparation of two reports that include findings and recommendations made by the OECD.

In addition to the specific duties of the department, the staff was involved in several activities, as follows:

- ✓ Providing the secretariat of the working group with the implementation of Standard Methodology for assessing the risk of corruption within the central public authorities and institutions
- ✓ Providing the technical secretariat within the Commission for monitoring the internal managerial control system at ANI level;
- ✓ Monitoring and implementing the action measures provided for in the National Anti-Corruption Strategy, which fall under ANI in the short term.
- ✓ Maintaining contact and collaboration with the Organization for Economic Co-operation and Development (OECD).

At ANI level, in addition to the 2 projects being implemented through the National Recovery and Resilience Plan, the following projects are also being implemented:

- ✓ The project "*Legitimacy and accountability for better protection of whistleblowers – LAW*", the overall objective of the project is to contribute to national and EU efforts to support and protect whistleblowers and to strengthen the capacity of national authorities and legal practitioners to ensure legal pathways of protection of whistleblowers, funded by the European Commission. ANI is a partner in this project.
- ✓ The project "*iMonitor – improving the efficiency of law enforcement by unifying the analysis of public procurement data and civilian monitors*", the overall objective being the creation of networks of civilian monitors who will have on-site monitoring role and the creation of a dedicated reporting standard, bringing together quantitative indicators of corruption risk and detailed civilian monitoring results, in order to produce operationally relevant reports for representative actors (law enforcement or other public authorities), funded by the European Commission.

In 2024, the activity of the Implementation of Structural Funds, Studies and Strategies Department was carried out by 3 people, at the end of 2024, 3 positions were occupied and 1 vacancy out of the total 4 positions approved at the level of the department.

Following the verifications carried out on the activity in 2024, no deficiencies were identified related to the activity of the Implementation of Structural Funds, Studies and Strategies Department.

Follow-up on the extent to which the findings identified in the audits prior to the year 2024 were addressed

The following deficiency **has been remedied**:

- *The workload of the SIFSSS staff is high, compared to overall workload of the services and considering that there are only two positions occupied within the service, out of the 9 positions approved by the job description, 7 positions being vacant at the end of 2021.*

During 2024, following the reorganization of the National Integrity Agency, there have been changes in the number of positions occupied, so that out of the 4 positions approved by the state of functions, 3 positions were filled and 1 position is vacant, at the end of 2024. Also, according to the new organizational structure of ANI, the Structural Funds Implementation Service, Studies and Strategies has been changed to the Implementation of Structural Funds, Studies and Strategies Department.

5.4.4 Human Resources Department

The human resources activity is ensured within the National Integrity Agency by the Human Resources Department (hereinafter "CRU"). The CRU operates under the Legal, Public Relations, Communication and Human Resources General Directorate.

According to the state of functions, at CRU level, there are 5 approved positions, of which, on 31.12.2024, 4 positions were occupied, the occupancy rate being 80%.

The responsibilities of the Human Resources Department were analyzed in accordance with the ROF, the operational procedures related to the CRU activity, and we also analyzed the compliance of the operational procedures applicable in 2024 with the ROF and the applicable legislation.

We organized interviews with the CRU staff and evaluated, through detailed tests, the flow of documents and processes carried out within the service, respectively:

- ✓ professional file management, both for civil servants and contract staff.
- ✓ organization of contests for filling vacant positions and for promotion within ANI.
- ✓ receiving, registering, tracking declarations of assets and interests for ANI's own staff.
- ✓ drawing up, endorsing and circulating time sheets (time sheets), including records of rest, medical, unpaid leave, etc.
- ✓ professional training – the annual improvement plan for 2024 and the evaluation of professional training actions.
- ✓ evaluation of the individual professional performances of the ANI staff.
- ✓ the employee promotion process.
- ✓ the process of termination/modification of employment relationships.
- ✓ the activity of the Disciplinary Commission established at the Agency level.
- ✓ drawing up and approving the state of functions of the ANI.
- ✓ drawing up and updating job descriptions.
- ✓ drawing up, approving and submitting the quarterly reports on the professional training of civil servants within the ANI and the annual report on the professional training of the Agency's staff.

As part of the verification process, the testing was carried out in two ways, depending on the nature of the activity subject to evaluation:

- ✓ Testing an operation from initiation to completion.
- ✓ Stratification of the population to be evaluated/sampling and testing of a transaction from initiation to completion for each individual process.

In order to carry out the detailed tests on the CRU activity, we requested the documentation related to the selected sample, respectively:

- ✓ From the situation of competitions organized by ANI in 2024, we selected 2 competitions out of the 9 competitions organized in 2024, to fill a public or contractual position.
- ✓ From the nominal situation of the contractual staff at ANI level for the year 2024, we selected 5 professional files from the 13 contractual positions occupied.
- ✓ From the situation of termination of employment relationships, 5 termination files were selected out of the 21 termination files for 2024.
- ✓ From the situation regarding the record of civil servants, 10 professional files were selected from the 70 civil servant files, active files in 2024.
- ✓ From the situation of newcomers in 2024, 5 files were selected out of the 19.
- ✓ Timesheet for October 2024 for the analysis of the method of drawing up, approval and the circuit of collective attendance sheets (timesheets).
- ✓ For testing the professional performance evaluation process in 2024, 10 performance evaluation reports for civil servants and 5 performance evaluation reports for contract staff were selected.

We obtained and evaluated the documentation applicable to each process from the point of view of periodicity and compliance with legal and procedural provisions, authorization and subsequent steps, compliance with legal deadlines, relevance and completeness of the information.

We also analyzed the duties included in the job descriptions of the personnel employed in the CRU, their concordance with the ROF and the applicable regulations. Regarding the activity of the Disciplinary Commission at ANI level, in 2024, we noted that in 2024 no case of disciplinary investigation was registered.

Following the verifications carried out on the activity in 2024, no deficiencies were identified regarding the activity of the Human Resources Department.

Follow-up on the extent to which the findings identified in the audits prior to the year 2024 were addressed

The following deficiencies have been **remedied**:

➤ Internal regulation of ANI not updated

The Internal Regulation of ANI, approved by Order 28/04.01.2008, does not include all the changes made in the legislation regarding the general framework for the organization and operation of public authorities, the status of their staff and other changes (e.g. GEO no. 57/2019 on the Administrative Code).

During 2024, the process of updating the ANI's Internal Regulations was started, a process that was completed in 2025 by approving the ANI's Internal Regulations by ANI's President Order no. 185/09.01.2025.

➤ **Low occupancy rate within the HRD**

The rate of employment within the HRD is 30%, starting from the second half of 2020 only 3 positions out of 10 positions provided in the organization chart are occupied. The personnel structure within the HRD, considering the number of positions occupied at the date of the audit, is undersized in relation to the workload.

As a result of the reorganization of ANI, starting with the approval of the new organizational structure of ANI, the Human Resources Service was transformed into the Human Resources Department, so that the occupancy rate at CRU level is 80%, respectively out of the 5 positions approved on 31.12.2024, 4 positions were occupied.

5.4.5 Labor Protection Department

The Labor Protection Department (hereinafter "CPM") operates under the General Directorate of Legal, Public Relations, Communication and Human Resources, based on ANI's organizational chart. The activity of the CPM is regulated by the Organization and Functioning Regulations of ANI and by the operational procedures that describe the flow of processes carried out in relation to ensuring protection and safety at work.

During 2024, at the level of the National Integrity Agency, a number of 194 trainings in the field of occupational health and safety were carried out for civil servants and contractual staff, with the individual training sheets being completed.

Based on the obtained documents, we selected the verification sample and performed the detailed tests on the selected sample. Thus, we randomly selected 15 files for which we verified the existence of the Health and Safety at work cards, as well as the existence and periodicity of the related training and signatures. We verified whether the provisions of the operational procedures are being followed, including the maximum time interval between two successive training sessions.²

At the CPM level, for the year 2024, by analyzing the procedural framework and the degree of compliance in relation to it, based on the selected samples, no findings were identified.

Follow up on the extent to which the findings identified in the audits prior to the year 2024 were addressed:

² The methodological norms for the application of Law 319/2006 approved by GD 1425/2006: "the interval between two periodic trainings is established according to the conditions of the job and will not be longer than 6 months."

The following deficiency has been **remedied**:

➤ **Occupational Safety and Health Committee non-functional**

We found that at the Agency level there is no updated order defining the composition of the Occupational Safety and Health Committee (CSSM). For the year 2023, no documents have been made available to certify the operation of the committee. Also, the Regulation on organization and operation of the CSSM was not made available to the auditor.

We noted that during 2024, the Occupational Safety and Health Committee was established at ANI level, by Order of the President of ANI no. 20693/17.12.2024. Also, the operational procedure regarding the organization and functioning of the CSSM was revised, respectively PO-CPM-43/12.12.2024. The Functioning Regulation of the CSSM was approved by the Order of the President of the ANI no. 4665/13.03.2015.

Ethics counseling activity

During the year 2024, the ethical counseling activity at the level of ANI was ensured by 2 employees, namely a person appointed by the Order of the President of ANI no. 22946/19.11.2021 until 19.11.2024 and another person appointed by the Order of the President of ANI no. 18966/19.11.2024, starting with 19.11.2024. The designated person is responsible for observing, monitoring and preventing the violation of the principles and rules of conduct by public officials.

We proceeded to verify the compliance of the activity carried out by the ethics advisor with the provisions of PO-DGJRPC-10 – *Operational procedure regarding the monitoring of compliance with the rules of conduct by civil servants and contractual staff within ANI*, approved on 23.11.2023 and revised on 30.09.2024.

At the level of 2024, no deficiencies were identified related to the activity of ethics counseling.

5.5 Procurement, Implementation and Archive Department

In accordance with the organizational structure, an integral part of the Organization and Functioning Regulation of ANI, approved by the ANI President's Order no. 14645/04.09.2024, the Procurement, Implementation and Archive Department (hereinafter "C.A.I.A.") operates as a structure under the authority of the ANI President.

The activity of the Procurement, Implementation and Archive Department is standardized and operates on the basis of specific operational procedures, developed in accordance with the provisions of Law no. 98/2016 regarding public procurement, Government Decision no. 395/2016 for the approval of the Methodological Norms for the application of the provisions relating to the awarding of the public procurement contract/framework agreement from Law no. 98/2016 and Law no. 101/2016 on remedies and appeals in matters of public procurement, sectoral contracts and works concession contracts and service concessions, as well as for the organization and operation of the National Council for the Resolution of Appeals.

In order to analyze the compliance of the activities carried out within PILB, we analyzed the way of organizing and carrying out the internal processes regarding the public procurement carried out at the Agency level in 2024.

We requested the list of public procurements carried out in 2024 and, after examining the list, we randomly selected a sample of 8 procurement procedures from the total of 48 procurements carried out during the year, as follows:

- ✓ 3 direct purchases,
- ✓ 1 procurement carried out through a simplified procedure,
- ✓ 1 acquisition carried out by an open tender procedure.

The extent to which the basic principles established by the current domestic regulatory framework ensure the use of transparency and competition as a means of obtaining fair and reasonable prices for all public procurement procedures carried out by the ANI was analyzed.

Therefore, we analyzed the extent to which public procurement rules and procedures are effective by meeting the following minimum criteria:

- a. respecting the **principle of competitiveness** between bidders in order to obtain the most advantageous offer from an economic point of view;
- b. ensuring compliance with the **principle of transparency** through the appropriate publication of information regarding the procurement procedure, from the moment of the notice of intent, during the procurement procedure and even after the award;
- c. ensuring compliance with the **principle of equal treatment, proportionality and non-discrimination**;
- d. preventing potential **conflicts of interest** during the entire procurement procedure.

On the occasion of the interview conducted with the representatives of C.A.I.A., the analysis of the procedural framework as well as the verification of the degree of compliance with it, through tests at the level of procurement files selected by sampling, the following aspects were found:

- ✓ the internal procedural framework is hierarchically organized and applies to all public procurements carried out;
- ✓ the public procurement system ensures an adequate degree of transparency throughout the entire public procurement cycle, from advertisement/intention/participation, evaluation, award and dispute resolution, to promote fair and equitable treatment of tenderers, i.e., potential suppliers and contractors;
- ✓ the public procurement system includes provisions regarding equal access for all potential bidders, including measures to ensure the absence of restrictions for certain candidates (of a technical, administrative nature - selection, exclusion and award criteria - and from the point of view of the calendar and deadlines);
- ✓ the public procurement system provides rules for communicating with potential tenderers in the same time frame and in the same way, in particular by ensuring that answers to clarification questions are provided promptly and that this information is transmitted to all interested parties;
- ✓ the procurement system includes rules to ensure the security and confidentiality of submitted information, in particular by: ensuring the existence of necessary measures for the security and storage of tender documents (for example, keeping a register of

- documents, numbering all documents or having a central storage space of all documents), as well as for limiting access to documents;
- ✓ the public procurement system provides clear and objective criteria for evaluating the economic and financial capacity as well as for the technical and professional evaluation of bidders;
 - ✓ the public procurement system provides rules for informing bidders (winners and non-winners) and the public about the result of the procurement process;
 - ✓ the public procurement system provides rules regarding the management of appeals to award procedures.

In 2024, C.A.I.A.'s activity was ensured by an average of 3 people, at the end of 2024, 3 positions were occupied and 4 vacancies out of the total of 7 positions approved at the department level, so that the occupancy rate at the C.A.I.A.'s level is 42.86%.

Regarding the document archiving, the activity was carried out, until May 14, 2024, by a suitably qualified person appointed by the Vice-President's Order no. 4572 of March 10, 2020. Following the recruitment competition for the position of archivist, starting on November 25, 2024, in accordance with ANI President's Order No. 19243/November 25, 2024, a new person was hired for the contractual position of archivist within the Procurement, Implementation, and Archive Department. The archiving, scanning, conversion, indexing, and storage of all declarations of assets and interests, as well as files resolved or closed by integrity inspectors, is carried out based on service contracts with companies specializing in this field. In order to verify the archiving process, we randomly selected a sample of 5 minutes of proceedings concerning the operational flow for the delivery and receipt of documents to the archive. We verified whether the selected sample complied with the procedural flow for the submission or removal of documents from the archive.

The archival nomenclature for the documents of the National Integrity Agency was approved by ANI Presidential Order No. 18424/17.11.2016 and endorsed by the National Archives through ANB -11423-U/12 December 2016 and includes the documents in the archiving file for each structure and the retention period.

In conclusion, for 2024, at the level of C.A.I.A., by analyzing the procedural framework and the degree of compliance in relation to it, based on the selected sample, we have not identified any deficiencies.

Follow-up on the extent to which the findings identified in the engagements prior to the year 2024 were addressed

The following deficiencies were **partially corrected**:

- ***The internal procedural framework is not correlated with the operational flow used in practice*** at the level of the Procurement, Investments and Administrative Department through the Procurement, Investments and Logistics Bureau, as a Necessity Report model is not used. The requirements regarding the establishment of resolution deadlines assigned by apostille, in physical format, as well as in the DMS, are not used in practice as a method of tracking the fulfillment of procedural steps.

During 2024, the system procedure for drawing up the "Necessity Report", code PS 25, Edition 1 Revision 2, approved on 20.06.2024, was developed. However, given the changes that occurred in 2024 regarding the organizational structure of ANI, including the subordination of C.A.I.A., PS 25 was not updated accordingly.

The following deficiencies were **not remedied**:

- ***The need to use some types of public procurement procedures that were not procedurally covered at that time, more precisely negotiation without publishing a tender notice and the competitive negotiation procedure based on GEO no. 114/2011 regarding the awarding of certain public procurement contracts in the fields of defense and security.***

Although in 2023, the procedures for the purchase of products/services/works through negotiation without publishing a tender notice and the purchase of products/services/works through competitive negotiation based on GEO 114/2011, were developed in a preliminary version (draft), these not being finalized and approved in 2024. Thus, no progress was made in 2024 regarding the development of the operational procedures for negotiation without the publication of a tender notice and the competitive negotiation procedure based on Government Emergency Ordinance No. 114/2011. According to discussions with the C.A.I.A. staff, delays in approving the procedures are caused by the high degree of workload of C.A.I.A. staff.

- ***The analysis of the procedural framework revealed two material errors to which a low level of risk can be attributed, namely:***
 - ✓ *the numbering of the operational procedure PO 10/S.A.I.A. – B.A.I.L. "Recording and keeping a copy of Public Procurement Contracts" does not follow the numbering of the operational procedures applicable within the service, the correct numbering being PO 7/S.A.I.A. – B.A.I.L.;*
 - ✓ *PO 01/ S.A.I.A. - B.A.I.L. "Acquisition through the "simplified procedure" of products/services/works" contains, in art. 12 (Rules/Constraints), the obligation to use the Report of Necessity format presented in PO 03/S.A.I.A. - B.A.I.L. regarding the purchase of products/works/services. The form referred to was identified in the annex to another operational procedure, namely PO 02/ S.A.I.A. - B.A.I.L. "Purchase through "Direct Purchase" of products/works/services".*

During 2024, the C.A.I.A.'s specific operational procedures were not revised, although this process should have been carried out in view of the changes that occurred during 2024 regarding C.A.I.A.'s organizational structure and reporting lines.

- ***The archival nomenclature is not updated***

Following the analysis carried out, we found that the Archival Nomenclature approved by the Order of the President of ANI no. 18424/17.11.2016 does not include the documents to be archived and the terms of document retention for the newly established structures at the level of ANI (e.g. the Directorate of Whistleblowers in the Public Interest). Also, the Archival Nomenclature has not been updated with the exact name of the structures on which changes have occurred over time.

During 2024, the Archival Nomenclature has not been updated.

5.6 Administrative and Logistics Department

The Administrative and Logistics Department represents within the National Integrity Agency the structure responsible for managing the car fleet and administrative spaces. The department's activity, carried out according to the ANI Organization and Functioning Regulations, refers to the following:

- Ensuring the maintenance, operation and repair of cars from the car fleet, as well as the repair of cars from the car park, as well as the application of the legal provisions in force that regulate car transport activity;
- Drawing up the journey sheets for each car in the Agency's fleet;
- Submitting requests for the supply of car tires, car batteries, car accessories, as well as for carrying out maintenance and repair operations, necessary for the proper functioning of cars;
- Notification, in suitable time, of the expiry dates of the mandatory and CASCO insurance policies for all cars in the fleet, in order to renew them;
- Ensuring the cleanliness and image of all the institution's vehicles, as well as the freedom from any obstacle, including snow, of the parking lot and the access ways in the institution's yard;
- Keeping the vehicles in perfect working order and their proper operation;
- Ensuring the state of cleanliness of the Agency's administrative headquarters and dependencies, by complying with hygiene and sanitary norms;
- Carrying out the procedures for registering/unregistering cars from the Agency's fleet and proposing their disposal, scrapping and capitalization under the law;
- Ensuring the management and recording of assets;
- Cleaning the administrative headquarters in appropriate conditions;
- Keeping, in good condition, the cleaning materials assigned to them, in order to clean the administrative headquarters;
- The selective collection of waste within the Agency, the transportation on the established circuit of garbage and residues of any kind, under appropriate conditions and responsibility for their correct deposit in bags/containers/bins;
- Developing and updating the fire prevention and extinguishing plan for all work areas within the Agency's headquarters;
- Verifying and monitoring how all Agency employees apply and comply with the provisions of Law 307/2006 on fire protection;
- Ensuring and coordinating the training of employees in emergency situations, participating in the development of documents and the application of the fire protection concept;
- Ensuring the preparation of the necessary documentation for obtaining permits, agreements, and authorizations for construction/expansion, tree pruning and clearing, fire safety, etc.

In 2024, the activity of the Administrative and Logistics Department was ensured by an average of 6 people, at the end of 2024, 6 positions were occupied and 2 vacant out of the total 8 positions approved at the department level, so that the occupancy rate at the level of the department is 75%.

In 2024, no deficiencies were identified regarding the activity carried out at the level of the Administrative and Logistics Department.

5.7 Accounting, Finance and Investments Department

The economic activity within ANI is ensured by the Accounting, Finance and Investments Department (hereinafter "CCFI"), and the specific attributions of CCFI are established by the Regulation of Organization and Operation of the ANI, which completes the normative acts with an impact on the activity of the department and its staff.

The CCFI's activity is standardized and carried out on the basis of operational and system procedures, developed in accordance with the requirements of SGG Order no. 600/2018 for the approval of the Code of internal/managerial control of public entities and other specific regulations.

We analyzed and evaluated the compliance of the operational and system procedures in force in 2024, with the ROF and the applicable legislation and also evaluated through detailed tests the specific CCFI processes and organized interviews with the department's representatives to conclude on the compliance of the practical activity with approved procedures and rules.

In order to analyze the CCFI's activity, we evaluated the following processes through detailed tests:

- ✓ Elaboration of the expense budget project for 2024;
- ✓ Elaboration of the public investment program for 2024;
- ✓ The substantiation process regarding the need for credits for 2024;
- ✓ Communication and implementation of budget corrections and credit transfers;
- ✓ Own preventive financial control at the level of the financial process;
- ✓ The hiring, liquidation, ordering and payment of expenses process;
- ✓ Monitoring personnel expenses;
- ✓ Carrying out cash register operations in lei and foreign currency, in compliance with the Regulation for cash operation.

For the sample selected on each process, we obtained the documentation specific to each process and evaluated the factual situation from the point of view of periodicity, compliance with the legal provisions and the way of handling errors.

We have obtained and analyzed the following documents:

- ✓ The Framework Letter of the Ministry of Finance no. 27584/14.11.2023 on the macroeconomic context, the methodology for drawing up the budget projects for 2024 and the estimates for the years 2025-2027;
- ✓ Internal administrative orders, issued by the Agency's management, regarding the appointment of people responsible for the process of hiring, liquidation, ordering and payment of expenses;
- ✓ Agency's Vice President Order no. 21062/30.12.2020 regarding the organization and exercise of own preventive financial control within ANI;
- ✓ Agency's President Order no. 6152/01.04.2024 and 6153/01.04.2024 regarding the organization and exercise of own preventive financial control within ANI;

- ✓ The register regarding the operations presented at the preventive financial control visa of the year 2024 for the I, II, III, IV quarter and we tested, by sample, the compliance of the operations presented at the visa;
- ✓ Cash register in RON and foreign currency for the month of October 2024 for which we checked the compliance of the flow of documents with the legislative provisions and those provided for in the operational procedure regarding payments made through the cash register;
- ✓ The report regarding Monitoring of personnel expenses financed from the state budget, submitted to the Ministry of Public Finance during 2023, for the months of October and December 2024, we verified compliance with the provisions of the operational procedure (PO – CCFI -12, Edition I, Revision I).

We also evaluated, through detailed tests, the following processes:

- ✓ Own preventive financial control at the level of the Department;
- ✓ Preparation of yearly financial statements;
- ✓ The process of assets inventory, based on a sample.

For this purpose, we have obtained and evaluated the documentation applicable to each process from the point of view of periodicity, compliance with legal provisions, authorization, compliance with legal deadlines and how to deal with errors.

In 2024, the activity of CCFI was ensured by an average of 5 people, at the end of 2024, 5 positions were occupied and 3 vacancies out of the total 8 positions approved at the level of the department, so that the occupancy rate is 62.5%.

Following the examination of the activity of the Accounting, Finance and Investments Department in 2024, no deficiencies were identified.

Follow up on the extent to which the findings identified in the engagements prior to the year 2024 were addressed:

The following deficiency has been **partially remedied**:

➤ The workload is high in relation to the complexity and volume of the activities carried out

The level of workload of the staff within the Economic Department is high, compared to the workload and the complexity of the works. Of the 11 approved positions at the service level, only 6 positions were filled at the end of 2023. Our understanding is that at the beginning of 2024 another 2 positions within the service became vacant due to the departure of 2 more people from the institution.

As a result of the reorganization of ANI, with the approval of ANI's new organizational structure, the Economic Service was transformed into the Accounting, Financial and Investment Department. Although in 2024 the Department's staff was supplemented with 2 new employees, we noted that 3 employees terminated their employment relationship in 2024. In order to ensure an organizational and functional framework of economic activity at ANI level, as well as to prevent possible situations of non-compliance with the legal provisions on

segregation of responsibilities, in relation to the volume of activities carried out at Department level, we consider it necessary to complete the personnel scheme at CCFI.

5.8 Public Internal Audit Department

The internal audit function is ensured within ANI by the Public Internal Audit Department (hereinafter "CAPI"), operating under the direct subordination of the President of ANI.

Taking into account the CAPI's attributions established by the Regulation on the organization and operation of the ANI and by the "Methodological norms regarding the exertion of the internal public audit activity", we proceeded to analyze the compliance of the practical activity carried out within the CAPI with the operational procedures in force for the year 2024 and with applicable law.

The department's activity is standardized and operates on the basis of specific operational procedures, developed in accordance with the provisions of Order no. 600/2018 regarding the approval of the Internal Managerial Control Code of public entities, as well as on the basis of the Specific Methodological Norms for the exercise of the internal public audit activity and the Internal Audit Charter. We noted that during 2023, respectively on 19.09.2023, the preliminary Specific Methodological Norms for the exercise of internal public audit activity and the Internal Audit Charter, updated as a result of the legislative changes in audit matters, were submitted for approval by UCAAPI internally. U.C.A.A.P.I. granted a favorable opinion on the Internal Audit Charter, no. 215/17.06.2024. The procedure for approving the methodological norms, by the U.C.A.A.P.I. is ongoing.

We organized interviews with CAPI staff and evaluated, through detailed tests, the flow of documents and processes carried out within the department, respectively we analyzed the following processes:

- ✓ Preparation of the Annual Internal Public Audit Plan for 2024, registered with no. 26196/30.10.2023;
- ✓ The preparation of the Multi-year Internal Public Audit Plan for the period 2024 – 2026, registered with no. 26194/30.10.2023;
- ✓ Preparation of the Program for Ensuring and Improving the Quality of the Internal Audit Activity for 2024 no. 30916/28.12.2023;
- ✓ Elaboration of the Annual Report on the internal public audit activity of the year 2024, registered with no. 1295/29.01.2025 and submitted to the U.C.A.A.P.I. and the Court of Accounts of Romania;
- ✓ Carrying out internal audit missions;
- ✓ Evaluation of the individual professional performance;
- ✓ Ensuring the continuity of the internal audit function;
- ✓ Continuous professional training of internal auditors.

During 2024, 3 assurance missions were carried out – regularity/compliance. In order to evaluate the managerial actions within the Public Internal Audit Department, we selected the assurance mission with the theme "Evaluation of the activities carried out within the Public Interest Whistleblower Directorate", a mission that was tested. In this sense, we obtained the documentation related to the selected internal audit mission and assessed the compliance of the activities undertaken with the applicable operational procedures.

The duties of coordinator of the activities specific to the internal audit structure were delegated by the Order of the President of ANI no. 19652/31.07.2023, the coordinator being approved by the U.C.A.A.P.I. In 2024, CAPI's activities were carried out by one person until October 14, 2024, when another person joined CAPI, so that by the end of 2024, two people were working within CAPI. The occupancy rate at the end of 2024 was 100%, respectively 2 positions were occupied out of the 2 positions approved at the level of the department.

At the level of 2024, following the evaluation of the operational procedures and based on the application of the verification methodology, no new deficiencies were identified.

Follow up on the extent to which the findings identified in the engagements prior to the year 2024 were addressed:

The following deficiencies have been **remedied**:

➤ ***Lack of an organizational and functional framework of internal audit activity***

At the end of 2023, the degree of occupancy at the PIAD level was 33.33%, respectively 1 post was filled from the 3 positions approved at the PIAD level, 2 positions being vacant (1 vacant temporary position and 1 vacant position). The mandatory minimum requirement for ensuring an organizational and functional framework of the internal public audit activity is that an internal public audit compartment is made up of at least 2 positions of internal auditors, full-time employees, according to art. 2 lit. d) and g) from Law no. 672/2022 on the internal public audit, with subsequent amendments and additions.

In 2024, the CAPI staff scheme is completed, the occupancy rate is 100% at the end of 2024, respectively 2 positions being occupied out of the 2 positions approved at the level of the department. Thus, the minimum mandatory requirement for ensuring an organizational and functional framework for public internal audit activities by establishing an internal public audit department with a minimum of 2 internal auditor positions is met.

➤ *According to the "Methodological norms regarding the exercise of internal public audit activity within ANI" and the "Evaluation of individual professional performances" procedure, **internal auditors must complete at least 15 days of professional training per year***

In 2024, the internal auditors of CAPI have carried out continuous professional training for a minimum of 15 working days per year for each auditor, as provided for in section 4.6.7. of the General Norms on the exercise of internal public audit activity of 11.12.2013, approved by Decision no. 1086/2013. One of the internal auditors carried out his professional training program based on the Professional Training Year Plan, approved by the President of ANI and registered with no. 1072/17.01.2024, as follows:

- Individual study sheet no. 2089/01.02.2024 and the individual study sheet results no. 2516/07.02.2024 (5 days),
- Individual study sheet no. 7460/22.04.2024 and the results individual study sheet and 7850/26.04.2024 (5 days)
- Individual study sheet no. 13905/19.08.2024 and individual study sheet results and 14479/02.09.2024 (5 days)

According to the discussion with CAPI staff, the second internal auditor, joined the CAPI team on 14.10.2024, carried out the professional training days at his previous workplace.

5.9 Registry Department

The Registry Department represents within the National Integrity Agency the structure responsible for the registry process, carried out according to the Organization and Functioning Regulation of ANI and in accordance with the operational procedures that describe the general registry flow.

The general registry process involves the following main activities:

- Receiving and verifying the correspondence addressed to the Agency and presenting it to the President of the Institution for distribution to the structure that will solve the issue and draft the response;
- Checking the correctness of the documents addressed to the Agency and sending them, if the correspondence is carried out by courier or registered mail;
- The immediate dispatch of the works based on the bill of lading, after they have been signed by the president or vice-president of the Agency;
- Technical editing of papers assigned by the president or vice-president of ANI.

In addition to the above activities, another activity mainly carried out within the RGA is the activity of taking telephone calls, according to PO-RGA-06 approved on 31.12.2021.

Taking into account the activities carried out within the RGA for the general registry process, activities established by the Organization and Functioning Regulations of ANI, we proceeded to analyze the compliance of the practical activity carried out with the applicable procedural provisions provided in PO-RGA-01 – PO-RGA-07.

We randomly selected a sample of 10 records out of the total 9050 records in the Electronic Register of Correspondence in 2024 and analyzed the way of receiving, registering and transmitting the responses. We also conducted interviews with the staff who ensure the general registry activity at the level of ANI.

The general registry activity was provided by an average of 2 people in 2024, at the end of 2024, with a number of 2 vacant positions and 1 temporary vacant, so that the occupancy rate at the end of 2024 was 40%.

At the level of 2024, by analyzing the procedural framework and the degree of compliance in relation to it, based on the selected sample and the interviews held, no new deficiencies were identified.

Follow up on the extent to which the findings identified in the engagements prior to the year 2024 were addressed:

The following deficiency was **partially remedied**:

- ***Lack of a digitized solution to support the activity of completing and preparing courier correspondence – Romanian Post***

The transmission of correspondence by courier - Romanian Post is carried out by drawing up a daily slip for the items of correspondence with the recommended indication and manually drawing up the recommendations with confirmation of receipt. The manual completion of the recommendations with confirmation of receipt requires a daily effort of time, on average 50 registered envelopes are sent daily. Also, the envelope that accompanies the correspondence is stamped with the ANI registration number, the number and date being filled in manually by the staff who ensure the correspondence process by courier. We found that in the process of preparing the documents necessary for the transmission of correspondence through the Romanian Post, no computer program is used that could simplify the process of preparing the documents that accompany the correspondence through the Romanian Post and would considerably reduce the time used by the personnel responsible for the transmission of the correspondence.

In 2024, with the replacement of the DMS application with the new Active Directory integrated document registration and management system (REGEN), a simplification of the document registration process has been observed. However, in the process of preparing the documents required for the sending correspondence through the Romanian Post, no computer program is used that could simplify the process of preparing the documents accompanying correspondence through the Romanian Post Office.

The following deficiency was **not remedied**:

➤ ***The high degree of workload of the staff who ensure the activity of the general registry***

The general registry activity is provided by 2 people. In addition to the activities related to the actual activity of the general registry (receiving/sending correspondence, technical editing of documents, Romanian Post trips, etc.), activity carried out daily by the personnel who ensure the registry activity is the activity of taking telephone calls received at the Agency level. One person from the 2 always answers the phone and provides information, where appropriate and within their competence, or directs the call to another structure within ANI. Considering the large number of calls received, especially during the periods of submitting declarations of assets and interests and considering the other responsibilities of the staff who ensure the activity of the general registry, we consider that the workload of the 2 persons is high.

Compared to the workload, the occupancy rate at the Registry Department, at the end of 2024, remains low, at 40%, with 2 positions occupied and 3 vacant or temporary vacant.

5.10 The activity of the Monitoring Commission of the Internal Managerial Control System

Within the National Integrity Agency, the Internal Managerial Control System (SCIM) Monitoring Commission was established, which ensures compliance with OSGG provisions no. 600/2018. The duties and responsibilities of the SCIM Monitoring Commission are reflected in the Regulation of Organization and Operation of the Monitoring Commission, approved by Internal Note no. 20391/18.10.2021.

During 2024, ANI Presidential Order no. 17475/28.10.2024 was issued, amending and supplementing the composition of the Monitoring Committee of the Internal Managerial

Control System provided for in Annex 1 to ANI Presidential Order no. 19781/01.08.2023 on the composition and duties of the Internal Managerial Control System Monitoring Commission, in accordance with the provisions of art. 3, para. (2) of the OSGG no. 600/2018 on the approval of the Code of Internal Managerial Control of Public Entities. The new composition of the Monitoring Commission is provided for Annex 1 to ANI President's Order no. 17475/28.10.2024.

The development program of the managerial control system of ANI, for the year 2024, was submitted for the President's approval, through address no. 8133/07.05.2024 and includes:

- ✓ the purpose of developing the internal managerial control system at the Agency level;
- ✓ the purpose of the Development Program of the internal managerial control system of ANI;
- ✓ the objectives of the development of the internal managerial control system at the Agency level;
- ✓ the stages of the development program of the internal managerial control system of ANI;
- ✓ the algorithmic steps of the Program.
- ✓ The development program of the Internal Managerial Control System at the level of ANI, for the year 2024, detailed on the 16 standards of the Code of Internal Managerial Control.

The SCIM development program includes details on the measures/operations established to achieve the ANI objectives, the persons responsible for the implementation of these measures, the relevant documents and deadlines.

We have analyzed the following documents for the evaluation of the degree of adequacy and effectiveness of the Monitoring Commission of the internal managerial control system at Agency level:

- ✓ The development program of the internal managerial control system for 2024;
- ✓ Convening of the Monitoring Committee meeting, Minutes of the meetings and decisions resulting from the period meetings of the Monitoring Commission of the internal managerial control system;
- ✓ The self-assessment questionnaires of the implementation stage of managerial control standards, in accordance with the provisions of OSGG no. 600/2018, at the level of ANI structures;
- ✓ Records of specific objectives and procedural activities at the level of ANI structures;
- ✓ The risk register for each ANI structure, as well as the risk register drawn up and updated at the Agency level;
- ✓ Continuity plan for all ANI structures for 2024, a plan that includes activities/actions, situations generating activity discontinuity, preventive measures to ensure business continuity, responsible, deadline, date and deficiency;
- ✓ System procedures and operational procedures at the level of ANI;
- ✓ Register of sensitive functions at the level of ANI for 2024 no. 1820/30.01.2024, a number of 79 sensitive positions being identified at the level of ANI;
- ✓ The report on the internal managerial control system as of 31.12.2024, sent to SGG by letter no. 2424/13.02.2025.

At the level of 2024, the general objectives at the level of ANI, recorded in Internal Note no. 18083/05.11.2024. The specific objectives derived from the Agency's general objectives were updated, at the level of 2024 for each ANI structure, and were approved by Internal Note no.

37/08.01.2025. The internal note was drawn up based on the references included in the Record of specific objectives and procedural activities at the level of each ANI structure, as follows:

- ✓ Evidence of specific objectives and procedural activities at the level of the President's Cabinet for 2024 no. 20899/19.12.2024
- ✓ Evidence of specific objectives and procedural activities at the level of the Vice-President's Office for 2024 no. 20892/19.12.2024
- ✓ Evidence of specific objectives and procedural activities at the level of the Internal Public Audit Department for 2024 no. 20293/11.12.2024
- ✓ Evidence of specific objectives and procedural activities at the level of the Legal, Public Relations, Communication and Human Resources General Directorate for 2024 no. 21329/31.12.2024
- ✓ Evidence of specific objectives and procedural activities at the level of the IT department for 2024
- ✓ Evidence of specific objectives and procedural activities at the level of the Accounting, Financial and Investment Department, no. 20039/06.12.2024
- ✓ Evidence of specific objectives and procedural activities at the level of the Procurement, Implementation and Archive Department for 2024, no. 21313/31.12.2024
- ✓ Evidence of specific objectives and activities that can be carried out at the level of the Integrity Inspection for the year 2024, no. 21077/23.12.2024
- ✓ Evidence of specific objectives and procedural activities at the level of the Whistleblowers in Public Interest Directorate for 2024, no. 20376/12.12.2024

The business continuity plan was drawn up, at the level of 2024, for each individual structure, as follows:

- ✓ Continuity plan for the activity of the President's Cabinet for 2024 no. 20900/19.12.2024
- ✓ Continuity plan for the activity of the Vice-President's Cabinet for 2024 no. 20893/19.12.2024
- ✓ Business continuity plan for the IT Department for 2024
- ✓ Continuity plan for the activity of the Integrity Inspection for 2024, no. 21078/23.12.2024
- ✓ Internal Public Audit Department's Business Continuity Plan for 2024 no. 20294/11.12.2024
- ✓ Business continuity plan of the Legal, Public Relations, Communication and Human Resources General Directorate for 2024 no. 20648/16.12.2024
- ✓ Business continuity plan of the Accounting, Finance and Investments Department for 2024 no. 20255/10.12.2024
- ✓ Business continuity plan of the Directorate of Public Interest Whistleblowers for 2024 no. 20378/12.12.2024
- ✓ Business continuity plan of the Acquisitions, Implementation and Archive Department for 2024 no. 21317/31.12.2024

The register of risks was drawn up at the level of each structure, and the Risk Register was also drawn up at the level of ANI for 2024 no. 974/22.01.2025, which includes a number of 130 risks. The technical secretariat of the SCIM Monitoring Commission informed the ANI management about the implementation of the risk management process in 2024 at the ANI level, through letter no. 975/22.01.2024.

We have analyzed the Reports on the development of the risk management process in 2024, at the level of each ANI structure, as follows:

- ✓ ANNUAL REPORT on the implementation of the risk management process in 2024 at the level of the President's Office no. 21160/24.12.2024
- ✓ ANNUAL REPORT on the implementation of the risk management process in 2024 at the level of the Vice-President's Office no. 20897/19.12.2024
- ✓ ANNUAL REPORT on the implementation of the risk management process in 2024 at the level of the Integrity Inspection no. 21082/23.12.2024
- ✓ ANNUAL REPORT on the implementation of the risk management process in 2024 at the level of the Whistleblowers in the Public Interest Directorate no. 20382/12.12.2024
- ✓ ANNUAL REPORT on the implementation of the risk management process in 2024 at the level of the Legal, Public Relations, Communication and Human Resources General Directorate no. 20814/18.12.2024
- ✓ ANNUAL REPORT on the implementation of the risk management process in 2024 at the level of the IT Department
- ✓ ANNUAL REPORT on the implementation of the risk management process in 2024 at the level of the Accounting, Finance and Investments Department no. 21026/23.12.2024
- ✓ ANNUAL REPORT on the implementation of the risk management process in 2024 at the level of the Procurement, Implementation and Archive Department no. 21318/31.12.2024
- ✓ ANNUAL REPORT on the implementation of the risk management process in 2024 at the level of the Internal Public Audit Department no. 20540/16.12.2024

Regarding the performance monitoring process at the level of ANI for 2024, the Technical Secretariat of the SCIM Monitoring Commission informed the ANI management about the performance monitoring process in 2024 at the level of ANI, through the address no. 1262/28.01.2025.

We noted that no integrity incidents were recorded at the level of ANI for 2024, in accordance with the Annual Integrity Incident Assessment Report for 2024, prepared by the ANI responsible for the implementation of the Integrity Incident Assessment Methodology.

The plan for the implementation of the control measures at the ANI level for 2024 was approved by the President of the Monitoring Commission and approved by the President of ANI on 16.12.2024. The plan deals with each of the risks identified by each structure separately by establishing appropriate control measures, a deadline for the implementation of these measures, as well as the individuals responsible for implementing the established measures.

According to the information provided by the ANI representatives responsible for the technical secretariat of the SCIM Monitoring Commission, no professional training courses in the SCIM field were conducted.

Following the verifications carried out on the activity of 2024, no new deficiency was identified.

Follow up on the extent to which the findings identified in the engagements prior to the year 2024 were addressed:

The following deficiency has been **partially remedied**:

➤ ***Failure to update operational procedures and system procedures***

On 18.01.2023, the new ANI Organization and Functioning Regulations was approved by Order of the ANI President no. 1822/18.01.2023, valid from February 3, 2023. We found that the operational and system procedures have not been updated and do not include references to the new ANI Organization and Functioning Regulations.

Considering the amendments to the ANI Organization and Functioning Regulations, approved by the Order of the President of ANI no. 1822/18.01.2023 (valid until 11.09.2024) by the Order of the President of ANI no. 14645/11.09.2024 (in force from 11.09.2024), we noticed that not all operational and system procedures have been updated as a result of the reorganization of the National Integrity Agency at the end of 2024 (e.g. the operational procedures related to the C.A.I.A., the Registry Department, etc.).

- *At the level of 2022, it was identified the **need to draft a system procedure** regarding the elaboration of the report of necessity, which would define the responsibilities of each department involved in the initiation of the public procurement/direct purchase procedure.*

Procedure During 2024, the system procedure for the preparation of the "Report of Necessity", code PS 25, Edition 1 Revision 2, approved on 20.06.2024, was developed. However, in view of the changes that occurred in 2024 regarding the organizational structure of ANI, including the manner of subordination of the C.A.I.A., PS 25 has not been updated accordingly.

The following deficiencies were **not remedied**:

- *Lack of a system procedure at the level of ANI on the pantouflage*

At the level of ANI, an adequate procedural framework was not organized to establish a unitary and coherent mechanism for the prevention and monitoring of slippage situations in the case of public procurement and sectoral procurement procedures, of the selection procedures of applications for funding from non-reimbursable funds, of the prohibitions that arise when leaving the body of public officials and those regarding public auditors, as well as the evaluation indicators related to these mechanisms. Pantouflage is a measure of institutional transparency and corruption prevention, provided for in Appendix no. 3 "Inventory of preventive measures, as well as evaluation indicators" to GD no. 1269/2021 regarding the approval of the National Anti-corruption Strategy 2021-2025 and its related documents.

During 2024, a system procedure was not developed to establish a unitary and coherent mechanism for the prevention and monitoring of pantouflage situations, respectively measures to prevent/remedy these situations, in accordance with the provisions of OSGG no. 600/2018 on the approval of the Code of Internal Managerial Control of Public Entities, with subsequent amendments and completions, Management Standard no. 1 – Ethics and integrity. Also, we did not notice the completion of the process of designating at the level of the institution a person responsible for monitoring the situations of pantouflage and the inclusion of responsibilities in the job description of the designated person.

- *According to the operational procedure dedicated to tracking the creation and return of the performance guarantee for public procurement contracts (PO 06/SAIA – BAIL), it is necessary to segregate the responsibilities related to the awarding and tracking of the public*

procurement contract between the contract manager, from the initiating department, and the person appointed to carry out the procurement procedure, within S.A.I.A - B.A.I.L..

During 2024, an operational procedure was not developed regarding the management of contracts awarded within public procurement procedures, defining the appointment of a contract manager at the level of the initiating department, from the moment of initiating the procurement procedure by drawing up the Necessity Report. It is necessary for each contract to appoint a contract manager to follow the implementation of the contract until its completion, the person in charge being appointed from the initiating department of the acquisition. We recommend the elaboration of the system procedure, through cooperation with all ANI structures, considering that the responsibilities of C.A.I.A. are completed at the time of signing the procurement contract/order note/invoice. The procedure should detail all the steps of tracking and ensuring the management of a contract, including a description of the responsibilities and forms used in this process.

5.11 IT Department

IT system evaluation

The National Integrity Agency has implemented an Information Security Management System (ISMS) that provides better control to the Agency's Management over information flows within ANI and can ensure unified management of IT security issues through active control of resources and processes internal.

The procedures carried out on the IT environment of the National Integrity Agency consisted in evaluating environmental control regarding the IT processes and the IT systems that support these processes in order to appreciate how the IT system responds to the needs deriving from the specific tasks that the institution has to fulfill them.

As part of the system evaluation process, aspects such as the evaluation of the degree of adequacy and operational effectiveness of the general controls of the IT system, including specific controls regarding information security, were considered.

The procedures carried out also included verifications on the general internal control framework of IT systems as well as on the policies and procedures implemented by the National Integrity Agency.

We carried out verifications on the IT system for the integrated management of declarations of assets and interests as well as the systems for the purpose of auditing and their functionalities, as well as the data recovery process and related risks, in order to be able to appreciate how they meet the needs which derive from the specific tasks that ANI has to perform.

The activities carried out covered the following areas:

- ✓ Information security policies.
- ✓ IT resource management.
- ✓ Access control.

- ✓ Physical and environmental security.
- ✓ Security of operations.
- ✓ Communications security.
- ✓ The process of managing changes regarding IT systems.
- ✓ Managing relationships with suppliers.
- ✓ Information security incident management.
- ✓ Business continuity management and disaster recovery.

In this report, the factual findings resulting from the verifications carried out on the IT environment of ANI are presented and are based on:

- ✓ Interviews with IT Department staff;
- ✓ ISMS policies and procedures, documentation and information received from IT Department staff;
- ✓ Analyzing the activities performed by the IT Department;
- ✓ Visiting and verifying the physical locations where the hardware equipment serving the ANI's applications and infrastructure is installed.

Following the verifications carried out on the activity of the year 2024, no new deficiency was identified.

Follow up on the extent to which the findings identified in the engagements prior to the year 2024 were addressed:

*The following deficiencies have been **implemented**:*

- *Backup monitoring - In the period prior to 2024 for the applications used by the Agency, the backup system was not configured to send alerts in case of errors in the backup process.*

During 2024, the SAP system related to the PREVENT application was configured to send alerts to the maintenance service provider, thus fixing the previously identified problem.

- *Administration of the DMS application – In the period prior to 2024, the DMS application was managed internally by IT staff, without a formal support or maintenance contract. It was at an advanced stage of its lifecycle, and replacement plans were repeatedly postponed, which raised availability and security risks.*

During 2024, the Agency implemented a new DMS solution, based on the NEXGEN platform, which benefits from technical support services provided by the provider. The deficiency was considered implemented.

- *Out-of-date policies and procedures – In the period prior to 2024, the set of security policies and procedures was not regularly reviewed to reflect changes in ANI's IT infrastructure and activities. Many documents were in old versions or without formal traceability.*

During 2024, the policy set was fully updated, with external support, and was aligned with the ISO/IEC 27001:2022 standard. The new documents include clear processes, responsibilities, version traceability and normative references.

*The following deficiencies were **partially remedied**:*

- *Business Continuity and Disaster Recovery - In the period prior to 2024, the Agency did not have a fully implemented Business Continuity Plan and no operational secondary location for the recovery of IT operations.*

During 2024, a backup system was installed in two distinct locations, with external expertise, and it was determined that in the event of a disaster, the backup would be restored to an infrastructure consisting of rented equipment/cloud services in the event of a major incident. However, the DRP plan is not operational and does not cover periodic testing, full system restoration, staff training, or clear activation of the plan.

- *Relationship with suppliers - In previous years, the Agency managed contracts with IT and related service providers for which suspension periods were identified.*

During 2024, ANI reassessed the technical needs and analyzed solutions to cover them. However, it was not possible to confirm the contractual continuity for all IT services, maintaining the deficiency as only partially remedied.

- *Security Incident Management - In previous years, security incidents, such as virus alerts, were not properly framed according to internal procedures and were treated as simple IT incidents. This practice could lead to a superficial analysis of the causes and the lack of adequate response measures.*

In 2024, ANI started using the Fortinet suite (FortiGate and FortiAnalyzer) for monitoring security incidents and maintained the plan to implement a SIEM and DLP solution through the PREVENT project. However, the lack of a fully operational SIEM solution prevents centralized collection and advanced correlation of security events.

- *Lack of a consistent backup process for critical applications – In the period prior to 2024, not all of ANI's critical applications were covered by backup, and the existing process was manual, monthly, and without integrity testing. Some essential applications, such as SIMIDAI and SEAL, did not benefit from any form of automated backup.*

In 2024, a backup system was put into operation in two locations (Lascăr 15 and 17), using NAS and VEEAM equipment. However, some of the essential systems are not yet covered, and backups of some VMs cannot be made due to lack of space. There is no automatic mechanism for testing the integrity of backups, and some processes require manual intervention.

- *Insufficient staff within the Information Technology Department – In the period prior to 2024, all positions provided for in the structure of the Information Technology Department were vacant, as a result of the legal restrictions on the occupation of positions. The lack of internal staff generated risks of discontinuity in ensuring IT functionality and imposed dependence on outsourced services and the support provided by STS.*

During 2024, 5 people worked within the IT structure, including one delegated person from ADR in a management position. Although the structure has been partially operationalized, the existence of delegated staff implies risks regarding stability and continuity, in the absence of permanent hires.

The following deficiency **was not remedied**:

For the following deficiency followed up in the 'not implemented' stage at the end of 2023, no progress was identified during 2024 that would allow for a change in classification, as follows:

- *Lack of fire extinguishing systems – In the period prior to 2024, server rooms were not equipped with automatic inert gas extinguishing systems. The lack of a specialized extinguishing solution represented a major risk in the event of a fire, which could irreversibly compromise IT equipment and critical data.*

During 2024, no progress has been made in the implementation of such a system. The possibility of relocating the critical infrastructure into a technical container provided with an adequate system is being analyzed, but this initiative is still in the preliminary phase, without a concrete plan or allocated budget.

6 Use of this report

This Report is intended for use by the management of the National Integrity Agency, in order to communicate it to the National Integrity Council and publish it on the Agency's website. As such, the deficiencies/findings included in this report should not form a basis for any other action.

Our findings, as presented in this Report, are based on documentation made available to us by ANI. We cannot rule out the possibility that we could have reached different findings if additional information and documents had been made available to us. We have relied on the contents of the documents and information provided to us and have assumed that such information and documents are correct and complete.

If there is additional information and/or documents that have not been disclosed or provided to us, or if any of the verbal statements or explanations are incorrect or misleading, it is possible that any of the findings, interpretations or opinions contained in this Report to be incomplete or to have generated different results, which would require different and additional procedures outside the scope of this mission.

The verification procedures carried out by TGS have been agreed between the National Integrity Agency and TGS. TGS makes no assurance as to the sufficiency of these verification procedures performed for the purposes of the Agency.

If we had applied additional specified procedures, it is possible that other matters would have come to our attention, matters that we would have reported to ANI.

This Report should not be interpreted as expressing opinions in the legal field, which is outside our area of expertise.

TGS is not responsible for updating this Report with events or circumstances occurring after 31.12.2024.

This Report or its contents may not be used, reproduced or distributed, in whole or in part, to any other party or for any purpose other than that for which it was issued, without obtaining the prior written consent of TGS, except those mentioned in the first paragraph. Furthermore, we do not accept responsibility to any third party for any breach of this obligation or for any opinion expressed or information presented in this Report. The information included in this Report is provided on the assumption that the recipient will not use it as the exclusive basis for any action or decision. This Report relates only to the items specified above and does not extend to any other type of financial information.

This report refers only to the management audit of the National Integrity Agency for the year 2024, carried out in accordance with the provisions of the ISRS 4400 standard, as defined in the specifications.

🔒 End of Report 🔒

7 ANNEX 1 The stage of implementation of the objectives of the ANI Strategy 2022 – 2025

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
O1 – Analysis of the current legislation and the Agency's case history	NRRP	Clarification and unification of legislation	Preliminary analysis report	Difficulties and delays in project implementation	EU funds (NIAct project)	NIAct Project Team	Fourth quarter 2022	Implemented The analysis of the current legislation and the Agency's case history was completed in December 2022. Thus, the research report (the main deliverable of this activity) was prepared, accompanied by the following annexes: - Narrative report on the legislative analysis; - Analysis of international recommendations regarding incompatibilities, conflicts of interest, declarations of assets and interests; - Analysis of three areas vulnerable to the occurrence of integrity incidents; - Analysis of the health and education sectors from the perspective of managing the monitoring mechanism for the implementation of the National Anticorruption Strategy; - Recommendations of the working group made up of representatives of the public administration at local level.
	CVM reports							
	European Commission Rule of Law Reports	Elimination of procedural inconsistencies						
	GRECO reports	Uniformity of the application of integrity rules						
	G20 - High-Level Principles on Wealth Disclosure by Public Officials							
	Criticism of civil society							
	Inconsistency of judicial practice							
	Agency Practice							

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
O2 – Elaboration of the legislative intervention proposal	NRRP	Clarification and unification of legislation	Ferenda law proposal	Difficulties and delays in project implementation	EU funds (NIAct project)	NIAct Project Team	Third quarter 2023	Implemented In 2023, the first form of legislative intervention in the field of integrity was carried out. The main objectives pursued by these amendments are: - Clear dissociation of situations of incompatibility or conflict of interest from other prohibitions or conditions of access to a certain position or professional quality; - Generalization of the incident sanction in the event of a final finding of a conflict of interest; - Covering the legislative vacuum regarding certain categories of people who, although they have the obligation to declare their assets and interests, are not concretely bound by any case of incompatibility or conflict of interest; - Clarification of the competence of the National Integrity Agency to verify and sanction any situations of incompatibilities and conflict of interest; - Standardization, where similar situations require similar regulations, of some elements of the legal regime applicable to the
	CVM reports							
	European Commission Rule of Law Reports	Elimination of procedural inconsistencies						
	GRECO reports	Uniformity of the application of integrity rules						
	G20 - High-Level Principles on Wealth Disclosure by Public Officials							
	Criticism of civil society							
	Inconsistency of judicial practice							
	Agency Practice							

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
								people obliged to submit declarations of assets and interests. The document was sent at the end of the year to the Ministry of Justice.
O3 – Public debate on the new legislative proposal	<p>NRRP</p> <p>CVM reports</p> <p>European Commission Rule of Law Reports</p> <p>GRECO reports</p> <p>G20 - High-Level Principles on Wealth Disclosure by Public Officials</p> <p>Criticism of civil society</p> <p>Inconsistency of judicial practice</p> <p>Agency Practice</p>	<p>Clarification and unification of legislation</p> <p>Elimination of procedural inconsistencies</p> <p>Uniformity of the application of integrity rules</p>	Procedures regarding submission to public debate completed	Difficulties and delays in project implementation	EU funds (NIAAct project)	NIAAct Project Team	December 2023	<p>Partially implemented</p> <p>Within the NIAAct project, the network of experts specialized in integrity issues in Romania – <i>Think Tank</i> – was created. Thus, during the four editions, representatives of non-governmental organizations were also present, namely the Romanian Association for Transparency or the Association for Cooperation and Sustainable Development.</p> <p>Subsequently, in August and September 2023, multiple rounds of consultations were organized with representatives of interested public authorities and institutions (e.g.: Ministry of Internal Affairs, Ministry of Foreign Affairs, Ministry of National Defense, Ministry of Labor, Ministry of Health, Ministry of Finance, Ministry of Development, Public Works and Administration, General Secretariat of the Government, National Agency of Civil Servants, Court of Accounts, Senate, Chamber of Deputies, the</p>

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
								<p>Legislative Council, the Permanent Electoral Authority, etc.).</p> <p>The points of view submitted by the participants in the consultations were integrated into the new legislative draft.</p> <p>At the same time, in November 2023, a debate was organized on the proposal for a normative act developed within the draft, to which key institutions from the central level were invited and participated, such as the Ministry of Internal Affairs, the General Secretariat of the Government, the Ombudsman, the Ministry of Health, etc. During the event, the normative proposals integrated in the legislative draft were presented, opinions were formulated regarding the key points of the proposed legislative amendments and Romania's legislative needs were debated. In this regard, substantiation notes were developed for the proposals to amend the legislation in force, also considering the proposals submitted by the public authorities and institutions consulted following the three rounds of meetings.</p>

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
								The draft legislation was submitted to the European Commission at the end of the second quarter of 2024, through the national reform coordinator.
O4 – Promotion on the legislative circuit and adoption of the legislative proposal	NRRP CVM reports European Commission Rule of Law Reports GRECO reports G20 - High-Level Principles on Wealth Disclosure by Public Officials Criticism of civil society Inconsistency of judicial practice Agency Practice	Clarification and unification of legislation Elimination of procedural inconsistencies Uniformity of the application of integrity rules	Legislative proposal promoted on the legislative circuit Legislation adopted	Blockage on the legislative circuit Delays in the approval of the legislative proposal	EU funds (NIAct project)	NIAct Project Team	December 2024 (maximum term assumed by NRRP)	Partially implemented The legislative proposal was sent to the Ministry of Justice at the end of 2023. The proposal is to be sent to the General Secretariat of the Government, and will reach Parliament, in front of the Chamber of Deputies and, subsequently, in the Senate, for debate and adoption.

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
O5 – Completion of the development of the risk analysis module for declarations of assets and interests	GRECO reports Agency Practice	Increasing data processing capacity Reduction of the deadlines for processing the files Stimulating the evaluation activity	Completed risk analysis IT module	Difficulties and delays in project implementation	EU funds (EMOD project)	EMOD Project Team	July 2022	<p>Implemented</p> <p>Within the EMOD project, the SAS analysis IT platform was completed, meant to provide integrity inspectors with alerting functionalities based on the scoring established during the period of analysis and development of the platform. (i.e., activity prior to the investigation-support analysis through which the system generates calculation algorithms to determine the risk associated with a statement). The SAS analysis platform has been constantly tested and improved to meet the real needs of integrity inspectors in the evaluation activity. In 2024, the platform was completed and became functional.</p> <p>The platform allows the automatic identification of all declarations of assets and interests that can be considered with an increased risk of integrity incidents, identification that is made based on risk factors (alerts).</p> <p>At the same time, at the level of the National Integrity Agency, <i>the Operational Procedure on the verification of declarations of assets</i></p>

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
								<i>and interests through the platform was adopted.</i>
O6 – Creation of IT applications that streamline and reduce file analysis times	Independent external audit report for 2020	Reduction of the deadlines for processing the files Digitization of the process of supervision and monitoring of files	Improved IT Management Module	Inadequacy of human and budgetary resources Technological and security limitations	ANI Budget External funds	CIT DGII	December 2022	Implemented Within the EMOD project, the development of the SAS analysis information platform was started, meant to provide integrity inspectors with alerting functionalities based on scoring. The SAS analysis platform has been constantly tested and improved to meet the real needs of integrity inspectors in the evaluation activity. In 2024, the platform was completed and became functional. The platform allows the automatic identification of all declarations of assets and interests that can be considered with an increased risk of integrity incidents, identification that is made based on risk factors (alerts). Moreover, at the beginning of 2024, the new ESIMIDAI platform became operational. It benefits from a series of optimizations, improving the ability to solve the files managed by the integrity inspectors (e.g., notifications to the integrity inspector regarding the expiry of the limitation period provided by Law

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
								no. 176/2010, or the existence of another file regarding the same person).
O7 – SIMIDAI interconnection with relevant external registers and databases in the integrity incident assessment process	GRECO reports Independent external audit report for 2020 Agency's practice	Increasing data processing capacity Reduction of the deadlines for processing the files	Automatic access to external databases	Inadequacy of human and budgetary resources Technological and security limitations Lack of responsiveness of decision-makers	ANI Budget EU funds (EMOD project)	DGII CIT EMOD Project Team	December 2023	Partially implemented In 2024, the SAS Analysis Platform was completed and operationalized at the level of the National Integrity Agency. The platform allows the automatic identification of all declarations of assets and interests that can be considered with an increased risk of integrity incidents, identification that is made based on risk factors (alerts). Moreover, at the beginning of 2024, the new ESIMIDAI platform became operational. It benefits from a series of optimizations, improving the ability to solve the files managed by the integrity inspectors (e.g., notifications to the integrity inspector regarding the expiry of the limitation period provided by Law no. 176/2010, or the existence of another file regarding the same person). During 2024, in addition to the databases already accessible in the process of assessing integrity incidents, the access of integrity

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								inspectors to a new platform offering the possibility of consulting financial information was ensured.
O8 – Leveraging open data from key sensitive areas³ to identify potential integrity incidents	GRECO reports Agency Practice National Anti-Corruption Strategy 2021 – 2025	Proactivity in the selection of cases, increasing the data processing capacity, solidifying the ANI case history	Developed internal procedures Potential integrity incidents assessed	Insufficient staffing scheme at the level of the General Directorate of Integrity Inspection Lack of open data	ANI Budget	DGII	Permanent	Not implemented
O9 – Streamlining the integrity incident assessment activity	CVM reports European Commission Rule of Law Reports GRECO reports	Improving the ability to evaluate integrity incidents Decrease in case handling times	N/A	Insufficient staffing scheme at the level of the General Directorate of Integrity Inspection	ANI Budget	DGII	Permanent	Implemented Starting with January 1, 2022, the people provided for by Law no. 176/2010 have the obligation to submit the declarations of assets and interests exclusively in electronic format, through the e-DAI platform. Thus, ANI receives in real time the declarations of assets and interests submitted by the people in

³ The priority sectors established by the National Anticorruption Strategy 2021 – 2025 are: Public health system, National education system, Business environment in Romania, Public procurement, Financing of political parties and electoral campaigns, Activity of members of Parliament, Protection of cultural heritage, Field of environmental protection

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
	<p>Law no. 144/2007, with subsequent amendments and completions</p> <p>Law no. 176/2010, amended and supplemented</p>							<p>charge of this obligation. In this regard, integrity inspectors have access through the e-DAI platform to the list of people who have not complied with the legal provisions regarding the deadlines for submitting declarations, thus eliminating the obligation of the responsible persons to draw up this list.</p> <p>In 2024, the SAS Analysis Platform was completed and operationalized at the level of the National Integrity Agency. The platform allows the automatic identification of all declarations of assets and interests that can be considered with an increased risk of integrity incidents, identification that is made based on risk factors (alerts).</p> <p>Moreover, at the beginning of 2024, the new ESIMIDAI platform became operational. It benefits from a series of optimizations, improving the ability to solve the files managed by integrity inspectors.</p>
O10 – Fulfilling the duties established by the Law on Transposition of the Directive on	The law transposing Directive (EU) 2019/1937 on the protection	The implementation of the legal duties that reside in the	Regulation on the organization and functioning of	Failure to allocate the necessary human and	ANI Budget	All ANI departments	Permanent	<p>Implemented</p> <p>Following the adoption of Law 361/2022 on the protection of whistleblowers in the public interest, the National Integrity Agency was</p>

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
the Protection of Whistleblowers in the Public Interest	<p>of whistleblowers in the public interest</p> <p>NRRP</p> <p>National Anti-Corruption Strategy 2021 – 2025</p>	responsibility of ANI	<p>ANI amended and supplemented</p> <p>Supplemented staffing scheme</p> <p>Adopted internal enforcement procedures</p> <p>Information sessions addressed to the public and private sectors on the new legislative framework for the transposition of Directive 2019/1937</p> <p>Guide on the protection of whistleblowers in the public interest, which</p>	<p>financial resources</p> <p>Failure to identify good practices</p> <p>Insufficient space to carry out the activity in optimal conditions</p>				<p>designated as an external reporting channel – the authority competent to receive reports in the public interest, and on February 6, 2023, the Whistleblowers in the Public Interest Directorate was operationalized.</p> <p>Currently, 5 employees work within the new structure.</p> <p>In March, a new operational procedure on the protection of whistleblowers in the public interest was adopted.</p> <p>Next, the section available on the ANI website (https://avertizori.integritate.eu/), dedicated to the submission of reports in the public interest, is populated with general information and frequently asked questions, being constantly updated.</p> <p>The National Integrity Agency has developed two guides dedicated to both whistleblowers in the public interest and designated people within the entities to receive reports and carry out subsequent actions, available in the dedicated section.</p> <p>In addition, public information activities were carried out on the</p>

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
			will include good practices identified at national and European level, developed and disseminated					<p>procedure for reporting violations of the law and protection measures. Moreover, activities were carried out regarding the verification/updating of the procedures for the unitary application of the legislation on the protection of whistleblowers in the public interest by the competent authorities to receive reports on violations of the law – internal/external reporting channels. At the same time, during the year, confidential counselling sessions were organized on the procedure for reporting, examining and resolving the report for people who intend to make a report.</p> <p>During the year, the integrity inspectors of the Whistleblowers in the Public Interest Directorate held training sessions for the people designated to solve reports.</p>
O11 – Development of the PREVENT system (objective established by NRRP, Pillar II Digital transformation, Component C7.	<p>CVM reports</p> <p>European Commission Rule of Law Reports</p> <p>NRRP</p>	Increasing the interoperability of public institutions' electronic systems for ex-ante verification of conflicts of interest in the	All public procurement procedures, initiated and carried out exclusively through SEAP, by the contracting	Failure to allocate the necessary human and financial resources	<p>NRRP funds</p> <p>ANI Budget</p>	<p>Analysis and Prevention Department</p> <p>CIT</p>	<p>December 2025 (maximum term assumed by the NRRP)</p>	N/A

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
Digital transformation)	Independent external audit report for 2020	public procurement award process Improving the PREVENT system	authorities provided for in art. 4 of Law no. 98/2016 and art. 4 of Law no. 99/2016 analyzed All integrity warnings issued by the PREVENT information system analyzed and solved Statistical data on the PREVENT information system published quarterly	Technological and security limitations				
O12 – Design and development of the digital platform for awareness and prevention	NRRP National Anti-Corruption Strategy 2021 – 2025	Raising awareness of integrity rules among stakeholders	Integrity Portal digital platform developed	Failure to allocate the necessary human and financial resources	NRRP funds ANI Budget	CIT DGJRPCRU DGII	December 2025 (maximum term assumed by the NRRP)	N/A

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
(objective set by NRRP, Pillar II Digital transformation, Component C7. Digital transformation)		Reducing the number of integrity incidents Reducing the number of requests for views on the legal framework of integrity addressed to ANI		Lack of interest in the target group Technical malfunctions				
O13 – Ensuring integrity and transparency in the conduct of electoral processes	CVM reports European Commission Rule of Law Reports	Optimizing the process of submitting declarations of assets and interests by candidates Reducing the number of potential integrity incidents Avoiding non-unitary interpretations of art. 25 of Law	Assistance in filling in the declarations of assets and interests by candidates List of people prohibited from holding an elected office updated Section specially created on the ANI website dedicated to	Non-unitary interpretations of the courts Lack of responsiveness of decision-makers at local/central level	ANI Budget	DGII CIT DGJRPCR SCRPS	Permanent	Implemented In 2024, in the context of the electoral processes organized for the local public administration, the members of the Parliament and the European Parliament and the President of Romania, the following actions were taken: Local and European Parliament elections The National Integrity Agency has launched, on its own website, a section dedicated to the elections scheduled for June, populated with essential information for both candidates and any interested person.

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
		<p>no. 176/2010 by the courts regarding the validation of the mandates of the elected officials</p> <p>Avoiding the resumption of electoral processes as a result of the invalidation of the mandates of elected officials under ban</p>	electoral processes					<p>Moreover, two press releases were issued disseminating useful information on the regime for submitting declarations of assets and interests, frequently asked questions to avoid integrity incidents, information on available guides and manuals, the list of persons under ban, as well as how to notify the Agency in case of irregularities in the declarations submitted by candidates.</p> <p>In addition, in the context of validating candidacies, the National Integrity Agency sent addresses to the Permanent Electoral Authority, the Central Electoral Bureau and courts, regarding persons under a ban from holding an eligible position.</p> <p>Moreover, the updated list was also sent in the context of the validation of the mandates of local elected officials, to the Superior Council of Magistracy to be disseminated to the courts concerned, according to the law.</p> <p>Presidential and parliamentary elections</p> <p>In the context of the presidential and parliamentary elections, the</p>

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
								<p>National Integrity Agency has launched a dedicated section on its website, populated with the same categories of information available in the context of the June elections. At the same time, a press release was issued containing relevant information for the candidates for the positions in the Chamber of Deputies and the Senate, as well as for the President of Romania.</p> <p>The National Integrity Agency has sent a new address, together with the list of persons under interdiction, to the Superior Council of Magistracy, to be disseminated to the courts concerned, in the context of validating the candidacies for members of the Romanian Parliament.</p> <p>In the context of validating the mandates, the National Integrity Agency sent the list of people under interdiction, who obtained a mandate.</p>
O14 – Elaboration of an "induction" type package regarding the legal integrity framework	National Anti-Corruption Strategy 2021 – 2025 Agency Practice	Increasing awareness of integrity rules among people subject to Law no. 176/2010	Guides developed on specific categories of functions and disseminated	Failure to allocate the necessary human and financial resources	ANI Budget	DGII DGJRPCR	December 2023	<p>Partially implemented</p> <p>During 2023, the extraction of the relevant legislation was carried out, within Activity 3.1. of the NIAct project.</p>

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
addressed to public functions and dignities in central and local administration, as well as in legislative structures		Reducing the number of integrity incidents Reducing the number of requests for views on the legal framework of integrity		Lack of interest in the target group				Subsequently, the selected information was sent to the Ministry of Justice for the elaboration of the "induction" package, intended for members of the Government, Parliament and persons employed in their cabinets. At the end of the year, discussions were held with representatives of the Ministry of Justice in order to continue the process of developing the induction package. Thus, a working meeting is to be set at the beginning of 2025.
O15 – Implementation of training programs regarding the integrity framework for specific categories of functions and public entities	National Anti-Corruption Strategy 2021 – 2025 ANI Practice	Increasing awareness of integrity rules among people subject to Law no. 176/2010 Reducing the number of integrity incidents	Minimum 3 training programs organized annually	Lack of responsiveness of decision-makers Failure to allocate the necessary resources Restrictions imposed by the COVID-19 pandemic	ANI Budget	DGII DGJRPCR SCRPS	Permanent	Implemented In 2024, the National Integrity Agency trained over 360 persons responsible for implementing the provisions of Law no. 176/2010, as well as depositors from public authorities and institutions, regarding the process of submitting declarations of assets and interests, as well as regarding the legal regime of incompatibility and conflicts of interest.
O16 – Continuation of communication	National Anti-Corruption	Increasing the degree of compliance	Information activities	Lack of responsiveness among entity	EU funds (NIAct project)	NIAct Project Team	Permanent	Implemented The National Integrity Agency has trained over 360 persons

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
and awareness processes regarding the transition to the electronic declaration system	Strategy 2021 – 2025 Agency Practice	among the responsible persons and depositors provided for in art. 1, para. (1), items 1-38 of Law no. 176/2010, regarding the submission of declarations of assets and interests in the e-DAI platform	carried out annually	managers, responsible persons and depositors Lack of budgetary resources necessary for the purchase of qualified electronic signatures Technical malfunctions	ANI Budget	DGII CTI SCRPS		responsible for the implementation of the provisions of Law no. 176/2010, as well as depositors from public authorities and institutions, regarding the digitization of the process of submitting declarations of assets and interests, as well as regarding the legal regime of incompatibilities and conflicts of interest. During 2024, two press releases were issued aimed at increasing compliance among responsible persons and depositors. Thus, according to the provisions of art. 21, para. (3) of Law no. 176/2010, the obligation of depositors to submit certified declarations of assets and interests exclusively with a qualified electronic signature was established, through the e-DAI platform. In this regard, a press release was issued in order to ensure a high degree of compliance with legal requirements and to streamline the process of declaring assets and interests. In the same regard, in June, before the deadline for submitting annual declarations, the Agency issued a press release on the compliant

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								<p>submission of declarations of assets and interests.</p> <p>Thus, at the end of 2024, the situation of the e-DAI electronic system was as follows:</p> <p>486,620 users were registered as depositors;</p> <p>13,142 institutions with at least one account created were registered;</p> <p>1,312,426 declarations of assets were sent to ANI;</p> <p>- 1,295,048 declarations of interest were sent to ANI.</p>
O17 – Improvement of the design of the ANI website	<p>Law no. 544/2001, as subsequently amended and supplemented</p> <p>G.D. no. 123/2002, amended and supplemented</p> <p>Memorandum of the Government of Romania on increasing transparency and</p>	Improving the communication of public information on the activity of ANI	Improved ANI website	Delays in design and programming execution	ANI Budget	<p>CIT</p> <p>SCRPS</p>	April 2022	<p>Implemented</p> <p>The new website of the National Integrity Agency was launched in April 2024.</p> <p>The delay in the launch of the new page occurred as a result of identifying, in the development process, the need to make improvements in the field of functionalities, information security, as well as to consolidate and streamline the management of the website.</p>

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
	standardizing the display of information of public interest (2016) National Anti-Corruption Strategy 2021 – 2025							
O18 – Implementation of the provisions pertaining to ANI by Law no. 129/2019 amended and supplemented	Law no. 129/2019, as subsequently amended and supplemented	The fulfillment of the legal duties that are the responsibility of ANI according to Law no. 129/2019	List of important public functions updated whenever the situation requires it List of important public functions transmitted to the European Commission exclusively by electronic means	Failure by entities to submit changes	ANI Budget	SCRPS	Permanent	Implemented In 2024, the National Integrity Agency updated the List of Important Public Functions on December 20, 2024, which is available on the website, in the specially dedicated section (https://tinyurl.com/yc8m9z8d). At the same time, ANI sent the List of important public functions to the European Commission Representation in Romania.

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			Dialogue with the National Office for the Prevention and Combating of Money Laundering					
O19 – Promoting the concept of public integrity in university and pre-university education	<p>Agency initiatives</p> <p>Requests for the academic environment regarding the development of internships</p>	Intensifying collaboration with academia	Minimum 3 events dedicated to university and pre-university education institutions organized annually	N/A	ANI Budget	<p>DGII</p> <p>DGJRPCR</p> <p>SCRPS</p>	Permanent	<p>Implemented</p> <p>In 2024, ANI continued the implementation of the Internship Pilot Program. The program was started at the end of 2023 and completed in the second quarter of 2024.</p> <p>At the same time, in January, the President of the National Integrity Agency gave a lecture to the students at the National School of Political and Administrative Studies. Moreover, in January, an integrity inspector gave a lecture to the second-year students of the "Alexandru Ioan Cuza" Police Academy – Law Specialization.</p>

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								Last but not least, in June, an integrity inspector ensured participation and gave a presentation at the third edition of the Summer School "Integrity and Transparency in Public Administration. Stop corruption!".
O20 – Continuation of the implementation of the EMOD project	Financing contract concluded with the POCA Managing Authority	Completion of the EMOD project	<p>Final refund request submitted to MA POCA</p> <p>Lack of recommendations regarding the implementation of the project in the Independent External Audit Report</p> <p>Expected results achieved</p> <p>General and specific objectives achieved</p>	Difficulties in implementing the project	EU funds (EMOD project)	EMOD Project Team	July 2022	<p>Implemented</p> <p>The final application for reimbursement under the EMOD project was submitted and subsequently approved by the Managing Authority. Thus, the expected results within the project were achieved, and the general and specific objectives were met.</p> <p>At the same time, the independent external audit report for 2021 does not include recommendations regarding the implementation of the project.</p>

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
O21 – Continuous professional training of the Agency's staff in specific areas of competence	Independent external audit report Annual Professional Development Plan for the Staff of the National Integrity Agency Plan of measures regarding the professional training of ANI staff	Increasing the professional capacity of ANI staff	A professional training program / employee / year	Failure to allocate the necessary budgetary resources	ANI Budget	CRU	Permanent	Partially implemented In 2024, the Government Emergency Ordinance no. 107/2024, which suspended the organization of public procurement procedures and the conclusion of legal commitments for budgetary expenses related to the professional training of staff in public institutions and authorities. Moreover, due to the high workload related to the shortage of human resources within the Agency, participation in professional training programs proved to be difficult, with the risk of affecting the performance of the institution's daily activities. During 2024, 2 employees of the Agency participated in 1 professional training program.
O22 – Ensuring Human Resources Management	Independent external audit report Establishment plan of the Agency	Carrying out the institution's activity in optimal conditions Planning and management of the Agency's human resources	Human Resources Management Policy developed	N/A	ANI Budget	CRU	June 2022/Ongoing	Implemented The Human Resources Management Policy was adopted on March 30, 2023.

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
		Recruitment and selection of ANI staff Evaluation of individual professional performance						
O23 – Developing the technical capabilities of ANI to retrieve and process declarations of assets and interests exclusively in digital format (objective established by NRRP, Pillar II Digital transformation, Component C7. Digital transformation)	NRRP CVM reports European Commission Rule of Law Reports GRECO reports	Carrying out in optimal conditions the activity of ANI in terms of technical resources Development of ANI's technical capabilities to take over and process declarations of interests and assets exclusively in digital format on qualified electronic signatures (cf. European Regulation eIDAS 910/2014)	Functional e-DAI system	Failure to allocate the necessary human and financial resources Technological and security limitations	NRRP funds	CIT	December 2025 (maximum term assumed by the NRRP)	N/A

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O24 – Implementation of the recommendations highlighted in the annual independent external audit reports	Law no. 144/2007, with subsequent amendments and completions Annual Independent External Audit Reports	Improving the institutional capacity of the Agency	No. of recommendations implemented	Insufficient human, budgetary and technical resources	ANI Budget	All ANI departments	Permanent	Partially implemented According to the 2023 External Audit Report, 74% of the recommendations for improving the work made in previous audit reports, which indicate a high degree of involvement and efficiency on the part of the institution's management, have reached the status of implemented or partially implemented.
O25 – Implementation of the objectives and measures provided for in the National Anti-Corruption Strategy 2021 - 2025	National Anti-Corruption Strategy 2021 – 2025	Implementation of integrity measures at the level of ANI Boosting cooperation with the institutions represented at the level of the Platform for the Cooperation of Independent Authorities and Anti-Corruption Institutions Established according to the NAS	Organizational Integrity Agenda adopted and distributed to ANI staff Integrity plan adopted and distributed Degree of implementation of the Integrity Plan evaluated annually and adapted to the newly emerged	Insufficient human, budgetary and technical resources	ANI Budget	SCRPS	December 2025	N/A

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
			<p>risks and vulnerabilities</p> <p>Corruption risks identified, analyzed, assessed and monitored corruption risks</p> <p>Integrity incidents at the level of ANI identified, evaluated and reported unitarily</p> <p>Contributions requested by the NAS TS submitted</p> <p>No. of coordination and monitoring activities of the strategy</p> <p>SNA portal used</p>					

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
			<p>No. participations in the meetings of the Platform for the Cooperation of Independent Authorities and Anti-Corruption Institutions</p> <p>No. of participations in thematic evaluation missions</p> <p>No. participation in the working groups set up at NAS level, at the request of the NAS TS</p>					
O26 – Fulfilling the role of beneficiary and coordinator of reforms and/or	NRRP Government Emergency	Fulfilling the role of coordinator of reforms and/or investments	No. participation in the working meetings and	Insufficient human, budgetary and	NRRP budget	The project implementation team within the	December 2025 (maximum term)	N/A

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
investments within the NRRP	Ordinance no. 124/2021	according to G.E.O. no. 124/2021 Implementation of projects budgeted through Romania's National Recovery and Resilience Plan	activities of the Interministerial Coordination Committee of the NRRP No. of reports to the Ministry of Investments and European Projects (MIPE)	technical resources		NRRP, set up at the level of ANI	assumed by the NRRP)	
O27 – Maintaining constant dialogue with the Parliament of Romania, the authorities and institutions of the central public administration, the associative structures of the local public administration and civil society	CVM reports European Commission Rule of Law Reports GRECO reports	Ensuring a framework for constant dialogue with the Romanian Parliament, the authorities and institutions of the central public administration, the associative structures of the local public administration and the civil society	No. of joint projects carried out No. of meetings organized No. of official addresses sent	Lack of responsiveness of decision-makers	ANI Budget	DGII DGJRPCR SCRPS	Permanent	Implemented Throughout 2024, the National Integrity Agency maintained constant dialogue with national entities, in order to ensure an improved framework for preventing and combating integrity incidents. In this regard, during the year, the National Integrity Agency submitted 6 points of view on draft normative acts that interfered with the Agency's activity. Of these, 2 were sent to the Ministry of Investments and European Projects, 2 to the Department for Romanians Abroad, one to the Ministry of Health and one to the General Secretariat of the Government.

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								<p>In addition, the Agency's representatives participated in the meetings of the working group set up to draft a normative act to supplement the Government Emergency Ordinance no. 57/2019 on the Administrative Code, respectively the establishment of rules of ethics and conduct for the members of the Government, other persons occupying positions of public dignity at the level of the central public administration and for the staff employed in their cabinets. Moreover, in the context of the organization of elections for the local public administration, the National Integrity Agency sent to the mayoralities and prefectures 10 points of view that had as their object the electoral process carried out.</p> <p>In the context of continuing the dialogue with the Chamber of Deputies and in order to avoid integrity incidents, the Agency submitted 12 points of view that had as object the analysis of the possibility of holding the quality of deputy with another position in the public or private domain.</p>

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O28 – Stimulating the activity of the Network for Integrity, as President of the Network	Integrity Network Action Plan 2021-2023, Network for Integrity Charter	Streamlining the Network for Integrity Strengthening cooperation between Network members Improving the relationship with international bodies Increasing Network Visibility	Action plan implemented at least 90%	Insufficient human and budgetary resources Restrictions imposed by the COVID-19 pandemic Lack of responsiveness among the members of the Integrity Network	ANI Budget Budget for Network for Integrity members	Secretariat of the Integrity Network / SCRPS	February 2023	Partially implemented The National Integrity Agency held the Presidency of the Network for Integrity for a 2-year term, between 2021 and 2023. The mandate of the Presidency was handed over to the National Institute for Transparency, Access to Information and Personal Data Protection (INAI) Mexico during the Fourth Plenary Meeting of the Network, which took place in Bucharest, on May 5, 2023. The Agency continued the implementation of the measures provided for in the Network Action Plan 2021-2023, with approximately 73% of the measures being implemented or partially implemented at the end of the ANI mandate. Among the measures implemented in 2023 we mention: increasing the number of members of the Network - the High Commission for the Declaration and Audit of Assets and Conflicts of Interest (HIDAACI) in Albania, the Official Ethics Commission (COEC) in Lithuania and

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
								<p>the National Anticorruption Authority (ANAC) in Italy; exchanging best practices with the Network's member institutions; promotion by the Agency's representatives of the Network at events.</p> <p>Moreover, in 2023, ANI organized the Fourth Plenary Session of the Network for Integrity. On this occasion, the Agency also organized an international conference attended by more than 40 national and international experts in the field of anti-corruption, thus strengthening the collaboration between members and facilitating the exchange of experiences and good practices.</p> <p>At the same time, the Agency issued a press release (https://tinyurl.com/a2r35fd3) in the context of the two events.</p>
O29 – Involvement of ANI experts in the monitoring missions carried out by international	Requests from international bodies National Anti-Corruption	Strengthening ANI's image as a donor of good practice at international	No. of events with the participation of ANI experts	Insufficient human and budgetary resources	ANI Budget Budget for international bodies	SCRPS	Permanent	<p>Implemented</p> <p><i>Activities carried out in the context of Romania's accession to the OECD</i></p>

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
bodies in the area of integrity	Strategy 2021 – 2025	level in the field of integrity		Restrictions imposed by the COVID-19 pandemic				The National Integrity Agency focused on implementing the recommendations made by the OECD Committees responsible for evaluating accession, in the areas related to its activity, in order to meet the requirements of the Roadmap for Romania's accession to the organization. Some of these recommendations targeted the PIAC (Integrity and Anti-Corruption) working group, a subsidiary body of the OECD Committee on Public Governance. Thus, the designated experts participated both in the preparation of the assessment missions, at inter-institutional level, and in their deployment, with OECD representatives, thus contributing to Romania's alignment with the organization's standards. Moreover, ANI also provided support to other institutions and public authorities in the implementation of recommendations which, although not related to its activity, had tangential links with the Agency's object of activity. In this context, the Agency also participated in the work related to the assessment mission on responsible business conduct.

Objective	Generator Source	Desiderata	Deliverables	Risks	Financial resources	Responsible	Term	Implementation Status 31.12.2024
								<p>From this perspective, ANI experts were actively involved in the accession preparation process, ensuring participation in thematic meetings. In addition, the Secretary-General of ANI ensured the participation in the launch of the 2 OECD reports on Greece's integrity framework, as an evaluator. Among the other events in which the participation of ANI representatives was ensured in the context of the collaboration with the OECD, there are: March 26 - 27 - Participation in the OECD Global Anti-Corruption and Integrity Forum 2024; March 28 – Participation in the discussions initiated by the OECD on the possibility of Romania's involvement in the OECD initiative related to public integrity performance indicators (PII); September 25 – Organization of a workshop on Whistleblowing in the Public Interest, in collaboration with the OECD, in the context of the project 23RO06 – Support in the implementation of integrity and anti-corruption within the scope of the legal framework in Romania, including in reducing the risk of</p>

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								corruption in the field of public procurement; 25–26 November – Participation of the Secretary General of ANI in the annual meeting of the OECD ACN Business Integrity Group
O30 – Promoting the institutional profile of ANI and the exchange of good practices at the international level	Requests from institutions with a similar profile National Anti-Corruption Strategy 2021 – 2025	Strengthening ANI's image as a donor of good practice at international level in the field of integrity	No. of events with the participation of ANI experts No. of organized study visits	Insufficient human and budgetary resources Restrictions imposed by the COVID-19 pandemic	ANI Budget	SCRPS	Permanent	<p>Implemented</p> <p>In 2024, the Agency's representatives participated in a series of international events, on which occasion the institutional profile of ANI and the exchange of good practices at international level were promoted. Verona – Italy</p> <p>At the invitation of the University of Trento – Italy, an ANI representative participated on February 2nd, in Verona (Italy) at the kick-off meeting organized within the qAID project - Towards contemporary knowledge and innovative tools to evaluate and improve the effectiveness of Asset and Interest Disclosure (AID) systems in EU Member States and Candidate States. The overall objective of the qAID project is to provide EU Member States and candidate states with contemporary knowledge and innovative tools to</p>

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								<p>assess and improve the impact of national asset and interest declaration systems.</p> <p>Chisinau - Republic of Moldova</p> <p>At the invitation of the Association for Sustainable Cooperation and Development (ACDD), the President of the National Integrity Agency participated in the workshop "Strategies for strengthening the rule of law in the Republic of Moldova: anti-corruption, recovery of criminal assets, confiscation of unjustified assets. Strengthening bilateral relations between Romania and the Republic of Moldova", which took place in Chisinau, Republic of Moldova, on February 15.</p> <p>Study visit of the delegation of the Anti-Corruption Bureau (ACO) of Bosnia and Herzegovina</p> <p>At the initiative of GovRisk, a consulting firm based in the United Kingdom, ANI received a delegation of the Anticorruption Office of the Canton of Sarajevo, Bosnia and Herzegovina, on March 18. On the</p>

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								<p>occasion of the study visit, ANI representatives presented the activity of the Integrity Inspection, as well as that of the Whistleblowers in the Public Interest Directorate, in order to strengthen the exchange of good practices and expertise. The initiative was part of a project funded by the UK Government's budget, namely the Western Balkans Rule of Law Initiative (WBROLI).</p> <p>Paris – France</p> <p>At the invitation of the Organization for Economic Co-operation and Development (OECD), a representative of ANI participated in the Global Anti-Corruption & Integrity Forum (GACIF) on 26-27 March. The Forum brought together representatives of the public sector, international organizations, and civil society to exchange views on reforms and good practices in the field of integrity and the fight against corruption.</p> <p>Rome – Italy</p>

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								<p>The President of the National Integrity Agency, Mr. Florin Ionel MOISE and a representative of ANI participated between April 8 and 9 in a study visit organized at the headquarters of the National Anticorruption Authority, in Rome (Italy). During the meeting, the activities of the two counterpart institutions were presented, in order to facilitate the exchange of good practices.</p> <p>Greece – Athens</p> <p>At the invitation of the Organization for Economic Co-operation and Development (OECD), Mr. Silviu Ioan POPA, Secretary General of the National Integrity Agency, participated as an international evaluator in the Launch of the OECD report on the analysis of Greece's integrity framework, especially with regard to conflicts of interest.</p> <p>Sofia – Bulgaria</p> <p>At the invitation of the Bulgarian Directorate of Internal Security, a representative of the Agency</p>

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								<p>participated in the conference organized on the occasion of the completion of the Erasmus+ project "European Partnership for Ethics and Integrity". During the event, the results of the project were presented, which mainly aimed at training public officials and law enforcement staff in the anti-corruption field.</p> <p>Brussels – Belgium</p> <p>A representative of ANI participated in the second plenary meeting of the EU Network against Corruption in October. During the meeting, both the new initiatives of the European Commission in the field of anti-corruption and the experiences of the member states in the fight against corruption were presented.</p> <p>Rome – Italy</p> <p>In October, Mr. Florin Ionel MOISE, President of the National Integrity Agency, participated in the plenary meeting of the ENPE network and in the international conference "Preventing corruption in Europe: a</p>

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								<p>new perspective", organized on the sidelines of the meeting. Thus, the discussions focused on the new European direction of anti-corruption measures, the exchange of expertise in the field of conflicts of interest, but also the strategic plan of the new Italian presidency of the network.</p> <p>Paris – France</p> <p>Mr. Silviu-loan POPA, Secretary General of the National Integrity Agency, participated in the meeting of the working group, which took place on October 15-16.</p> <p>Vienna – Austria</p> <p>In October, Mr. Silviu-loan POPA, Secretary General of the National Integrity Agency participated in the 42nd meeting of the Governing Council.</p> <p>Study visit of the Center for Analysis and Prevention of Corruption of the Republic of Moldova</p>

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								<p>In October, a delegation of the Center for Analysis and Prevention of Corruption of the Republic of Moldova participated in a study visit, organized at the headquarters of ANI. Thus, the dialogue focused on the activities of the National Integrity Agency, with a focus on the activity of the Integrity Inspection within ANI and the Whistleblowers in the Public Interest Directorate. The study visit was part of a series of meetings with institutions in Romania, an initiative of the Romanian Academic Society.</p> <p>Warsaw – Poland</p> <p>At the invitation of the Central Anticorruption Bureau (CBA) of Poland, Mr. Florin Ionel MOISE, President of the National Integrity Agency and a representative of ANI participated in the international conference "Asset declarations - unification, digitalization, control". During the event, the President of ANI presented the Romanian legal framework for declaring assets, as well as the Agency's digital portfolio.</p>

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								<p>Study visit of the delegation of the Anti-Corruption Bureau (ACO) of Bosnia and Herzegovina</p> <p>In December, a study visit of the Anti-Corruption Bureau (ACO) of the Canton of Sarajevo, Bosnia and Herzegovina, was organized at the headquarters of ANI. The meeting was attended by Mr. Silviu Ioan POPA, Secretary General, with a representative of the Agency, and the discussions contributed to the exchange of experience and good practices.</p>
O31 – Involvement of the Agency in official assistance projects for developing countries	Law no. 213/2016 on international cooperation for development and humanitarian assistance, with subsequent amendments and completions	Assistance to developing countries listed by the Development Assistance Committee of the Organization for Economic Co-operation and Development (OECD/DAC) Maintaining dialogue with	No. of education and training activities dedicated to developing countries	<p>Insufficient human and budgetary resources</p> <p>Restrictions imposed by the COVID-19 pandemic</p> <p>Lack of responsiveness of developing state authorities</p>	ANI Budget	SCRPS	Permanent	<p>Implemented</p> <p>During 2024, the National Integrity Agency carried out 7 activities that constitute official assistance to developing states.</p> <p><i>Bosnia and Herzegovina</i></p> <p>At the initiative of GovRisk, a consulting firm based in the United Kingdom, ANI received a delegation of the Anticorruption Office of the Canton of Sarajevo, Bosnia and Herzegovina, on March 18. On the study visit, ANI representatives</p>

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		the Ministry of Foreign Affairs						<p>presented the activity of the Integrity Inspection, as well as that of the Whistleblowers in the Public Interest Directorate, to strengthen the exchange of good practices and expertise. The initiative was part of a project funded by the UK Government's budget, namely the Western Balkans Rule of Law Initiative (WBROLI).</p> <p>Republic of Moldova</p> <p>In March, the President of the National Integrity Agency participated in the workshop "Good practices of inter-institutional cooperation and public communication tools on law enforcement: anti-corruption, recovery of assets derived from crimes, confiscation of unjustified assets. Strengthening bilateral relations between Romania and the Republic of Moldova". The main objective of the event was to identify instruments to ensure resilience, rule of law and stability in the Republic of Moldova through the exchange of experience, challenges and good</p>

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								<p>practices between law enforcement and rule of law professionals.</p> <p>Uzbekistan</p> <p>Within the TAIVEX initiative - a project dedicated to Uzbek prosecutors' offices and aimed at capacity building on corruption risks and promoting integrity - two integrity inspectors from the National Integrity Agency gave a presentation on the regulations in the field of incompatibilities and conflicts of interest and the work of the National Integrity Agency in front of a delegation of 5 members.</p> <p>The main objective of the project was to fulfill Uzbekistan's obligation to implement anti-corruption instruments and mechanisms, through the exchange of good practices stemming from the 2030 Agenda for Sustainable Development.</p> <p>Haiti</p> <p>In June, a representative of ANI participated in UNODC's anti-corruption program to support</p>

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								<p>Haitian national authorities. The main objective of the project was to strengthen the anti-corruption framework in Haiti through the exchange of best practices and expertise, Romania being selected as a country recognized for its efficient asset declaration system. The ANI representative presented the Romanian asset declaration system, highlighting the digital tools implemented.</p> <p>Republic of Moldova</p> <p>In October, a representative of the National Integrity Agency gave a presentation at a training course organized by the Schengen Multifunctional Training Centre, on "Preventing and combating money laundering". The focus of the presentation was on the prevention and identification of unjustified wealth, and case studies were shared to support the capacity building of representatives of anti-corruption institutions in the Republic of Moldova.</p> <p>Republic of Moldova</p>

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								<p>In October, a delegation of the Center for Analysis and Prevention of Corruption of the Republic of Moldova participated in a study visit to the headquarters of ANI. The dialogue focused on the activities of the National Integrity Agency, with a special focus on the activity of the Integrity Inspection within ANI and the Whistleblowers in the Public Interest Directorate. The objective was to facilitate the exchange of best practices and expertise.</p> <p>This visit was part of a series of meetings with institutions in Romania, as part of the initiative of the Romanian Academic Society.</p> <p><i>Bosnia and Herzegovina</i></p> <p>In December, an additional study visit was organized for a delegation of the Anti-Corruption Office, Canton of Sarajevo, where discussions focused on communication activities. The Secretary General of ANI and a representative focused on the importance of communication</p>

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								<p>strategies, as well as on the best communication techniques.</p> <p>The work was part of a development program funded by the UK government – namely the Western Balkans Rule of Law Initiative (WBROLI).</p>



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