

Annex

To facilitate the provision of information on good practices and challenges with respect to the establishment of effective financial disclosure systems for appropriate public officials (inter alia information on legislation, policies, practices and institutions on establishing and maintaining effective financial disclosure systems for appropriate public officials, including measures as may be necessary to permit their competent authorities to share that information with the competent authorities in other States parties) the Secretariat has prepared the following questionnaire as a guide that States parties may wish to use.

The Secretariat also wishes to draw the attention of the Government to the note entitled “Asset and interest disclosure systems (article 8, paragraph 5, of the United Nations Convention against Corruption)” contained in document [CAC/COSP/WG.4/2018/3](#) that could be used as background material for the completion of the questionnaire.

Contact information

1. Basic information

1.1. Does your country have a financial disclosure system(s) for appropriate public officials in line with articles 8, paragraph 5 and 52, paragraphs 5 and 6 of the Convention?

YES, in part

If YES,

- a. Please provide a broad overview of your country’s financial disclosure system(s) for public officials and list the relevant national legislation.

The National Integrity Agency is the central oversight body regarding the integrity rules for public officials and dignitaries. ANI is an autonomous administrative authority with legal personality, operating nationally as a single structure, the institution in Romania with exclusive competence in managing the system of asset and interest disclosures and identifying, as well as preventing and combating integrity incidents – incompatibilities, conflicts of interest or unjustified wealth.

The Agency was established on the basis of Law no. 144/2007, *on the establishment, organization and operation of the National Integrity Agency, republished, as subsequently amended and supplemented*, which was later supplemented by Law no. 176/2010 *on the integrity of exercising public positions and offices, for the amendment and completion of Law no. 144/2007 on the establishment, organization and operation of the National Integrity Agency, as well as for the amendment and completion of other normative acts, as subsequently amended and supplemented*.

Law no. 176/2010 institutes the obligation for 40 categories of public officials and dignitaries to submit asset and interest disclosures (*Information on these officials will be provided under question 2.1.*). Widely, ANI is responsible for (i) Collecting, archiving and evaluating the asset and interest

disclosures; (ii) Controlling the submitting within the legal terms provided by law of asset and interest disclosures; (iii) Enforcing sanctions provided by the law; (iv) Notifying the competent authorities in cases of misconduct which may constitute criminal offenses, disciplinary or fiscal deeds; (v) Providing public access to asset and interest disclosures.

Moreover, these attributions are complemented by the prevention and awareness-rising activities carried out, aimed to promote and increase the compliance with the integrity legal framework.

- b. If your country has, in addition, ad hoc financial disclosure requirements, please provide a broad overview, including applicable categories of officials, sectors/activities, etc.

We note that there are no ad hoc asset disclosure requirements that fall under ANI's competence, other than the asset disclosures submitted in accordance with art. 4, paragraphs (1), (2) and (3) of Law no. 176/2010. (*Information on the legal terms for submitting disclosures shall be provided under question 3.1.*)

- c. What is the objective(s) of your country's financial disclosure system(s) (please select all that apply)?
- Detection of illicit enrichment
 - Prevention of conflicts of interest
 - All of the above (combined system) – Detection of *unexplained* enrichment and Prevention of conflicts of interest
 - Other, please describe: _____

Asset and interest disclosures in Romania serve for both ensuring transparency while exercising a public office, as well as for the evaluation activity carried out by integrity inspectors, in order to identify potential incompatibilities, conflicts of interest and unjustified wealth. In observance of the principles with which it was invested by law, the main objective of the Agency is to ensure integrity in the exercise of public offices and dignities and to prevent institutional corruption by taking responsibility for the evaluation of asset disclosures, data and information about asset and changes in properties, incompatibilities and conflicts of interest situations that persons provided by Law no. 176/2010 may find themselves while exercising the public office or dignity.

- 1.2. Has your country criminalized “illicit enrichment” as foreseen under article 20 of the Convention?

Romania signed the United Nations Convention against Corruption on the 9th of December 2003, and ratified on the 2nd of November 2004.

According to the Romanian Constitution, "*Legally acquired assets shall not be confiscated. Legality of acquirement shall be presumed*".

In this regard, we note that the National Integrity Agency operates with the concept of unjustified (unexplained) variation of wealth, which, according to the provisions of art. 18 of Law no. 176/2010, consists of more than 10.000 Euros or the Ron equivalent of this amount difference between incoming cash flow and outgoing cashflow during the exercise of public functions.

2. Targeted officials

2.1. Please list the categories of officials required to file a financial disclosure. Please select all that apply and provide the range of targeted officials in each relevant category.

Public officials, including representatives from all branches and agencies of government

Members of the legislative branch, please list:

- Presidents of the Parliament Chambers, Deputies and Senators
- Candidates for the positions of deputy or senators
- The President of the Legislative Council and the Section Presidents;

Members of the judiciary and prosecution, please list:

- Members of the Superior Council of Magistracy
- Judges, prosecutors, assistant magistrates, their assimilations, as well as judicial assistants;
- The specialized auxiliary staff of the courts and prosecutor's offices;
- Judges of the Constitutional Court;

Members of the executive branch, including armed forces and agencies subordinate to a minister, please list:

- President of Romania;
- Presidential and State Counsellors;
- Prime Minister, members of the Government, State Secretaries, Undersecretaries of State, their assimilations, as well as state advisers from the working apparatus of the Prime Minister;

- Candidates for the positions of President of Romania
- The staff employed at the office of the dignitary in the central public administration

Officials of independent government bodies (*e.g., standalone boards, commissions and agencies that fall outside the executive, legislative and judicial branches of government*), please list:

- The People's Advocate and its Deputies;
- Members of the Court of Auditors and its management and control staff;
- the President and Vice-President of the National Supervisory Authority for Personal Data Processing;
- Members of the Competition Council;

- Members of the College of the National Council for the Study of Securitate Archives;
- Members of the National Securities Commission;
- Members of the Economic and Social Council;
- Members of the Board of the Insurance Supervisory Commission;
- Members of the National Council for Combating Discrimination;
- Members of the National Audiovisual Council;
- Members of the boards of directors and of the steering committees of the Romanian Broadcasting Society and of the Romanian Television Society;
- The President and Vice-President of the National Integrity Agency, as well as the members of the National Integrity Council;
- Governor, First Deputy Governor, Deputy Governor, members of the Board of Directors, employees with managerial positions of the National Bank of Romania

X Officials at the supranational (high-level) bodies (*e.g., representatives of the country in regional and global organizations/bodies*), please list:

- Romanian members of the European Parliament and members of the European Commission on behalf of Romania;
- Diplomatic and consular staff;

X Officials at subnational levels of government (*e.g., officials at the level of local government, provinces and municipalities*), please list:

- Local elected officials;
- Persons with management and control positions, as well as civil servants, including those with special status, who carry out their activities within all central or local public authorities or, where appropriate, in all public institutions;
- Prefects and sub prefects
- Candidates for the positions of county councilor, local councilor, president of the county council or mayor
- The staff at the prefect's chancellery

Political party officials, please list:

X Representatives of publicly owned (fully and partially) enterprises, please list:

- Members of boards of directors, boards of directors or supervisory boards, as well as persons holding managerial positions within autonomous regions of national or local interest, companies and national companies or, as the case may be, companies in which the State or a local government authority is a majority or significant shareholder;
- Staff in the management of banks in which the state is a majority or significant shareholder;

X Representatives of private entities, professional associations, foundations and similar bodies performing public functions and services of public interest, please list:

- Presidents, vice-presidents, secretaries-general, economic directors and/or treasury of national sports federations, of the Romanian Olympic and Sports Committee and of the National Paralympic Committee.

X Other, please list:

- Members of the Board of the Supervisory Commission of the Private Pension System;
- The Director General and the members of the Board of Directors of the National Press Agency AGERPRES;
- Director of the Romanian Intelligence Service, first deputy and his deputies;
- Director of the Foreign Intelligence Service and its deputies;
- Director of the Protection and Guard Service, First Deputy and Deputy;
- Director of the Special Telecommunications Service, First Deputy and Deputies;
- Persons with management and control positions within the state educational system and state units of the public health system;
- The staff of public institutions, including staff employed under an individual employment contract, involved in the privatization process, as well as staff of institutions and public authorities, including staff employed under an individual employment contract, who manage or implement programs or projects financed from external funds or budgetary funds;
- Presidents, vice-presidents, secretaries and treasuries of trade union federations and confederations.

2.2. What factor(s) shaped the decision on the targeted categories of officials? Please select all that apply.

- Objective of the system
- Hierarchical level and position of officials
- Corruption risk level of sectors and functions
- Resources and capacity to manage and verify disclosure
- Other.

2.2.1. Please elaborate on your response above.

The targeted officials are represented by those having prerogatives of public power (influence decisions, allocate budgets, recruiting etc.).

At the same time, the decision of targeted officials was also based upon objectives of the system, hierarchy levels or risk level of sectors (e.g. procurement, EU funds management).

2.3. Does any authority have the power to request any official who would usually fall outside the disclosure system to file financial disclosure (*e.g., designate those in high-risk categories, those under investigation for corruption offences, etc.*)?

No, the list of fillers is explicitly provided by art. 1, para. (1) of Law no. 176/2010.

2.4. How does your country create and update the list of filers?

The list of persons that fall under the obligation to submit asset and interest disclosures (i.e. deponents) was established by law, this meaning that the list of filers can be modified only through legislative amendments.

For instance, throughout the National Integrity Agency's 16 years of existence, there have been cases in which amendments have been brought to the law, with regard to the list of deponents. For example, in 2022, a new category of deponents was introduced, namely "*Presidents, vice-presidents, secretaries-general, economic directors and/or treasury of national sports federations, of the Romanian Olympic and Sports Committee and of the National Paralympic Committee*".

2.5. Please provide the approximate number of filers.

In this regard, annually, approximately 400.000 officials have the obligation to submit asset and interest disclosures, namely annual disclosures, suspension, appointment and end of office disclosures.

In electoral years (given that candidates must submit disclosures when running for an office) this can rise to 1,6 million filers.

3. Frequency of disclosure

3.1. When and how often are targeted officials required to file/submit financial disclosures? Please select all that apply.

- Upon entering office
- Upon leaving office
- Annually
- Biennially (once every two years)
- Once every three years
- Some categories of officials are more frequently required to declare than the others
- Other, please describe. _____

According to the provisions of Law no. 176/2010, aside from the candidates for the positions of President of Romania, deputy, senator, county councilor, local councilor, president of the county council or mayor", the remaining categories of public officials and dignitaries, have the obligation to submit asset and interest disclosures, as follows:

- annually, no later than June 15;
- within 30 days from the date of appointment or election to the public office;
- in the case of suspension from public office, within 30 days from the date of termination of the suspension;
- no later than 30 days after the date of being released from public office.

3.2. Does the competent authority have the power to request targeted officials (filers) to submit ad hoc financial disclosures between the official submission periods?

NO

3.3. Are the targeted officials required to update/amend their financial disclosures between submission periods?

Targeted officials are not *required* to update or amend their financial disclosures between submission periods. However, according to Law no. 176/2010, the officials have the possibility to file rectification disclosures, whenever deficiencies in the disclosures are detected, but not later than 40 days from the initial submission. The rectified asset and/or the interest disclosure may be accompanied by supporting documents.

The procedure also provides that if within 10 days of receipt of the assets and interest disclosures, the focal point (the designated persons that collect declaration from their own organization) notifies deficiencies in the disclosures, they shall recommend in writing to the concerned person, on the basis of signature or registered letter, to rectify the asset and/or interest disclosure, within no more than 30 days from the submission of the recommendation.

4. Competent authority and disclosure process

4.1. Which authority/entity is responsible for collecting and maintaining financial disclosures? Please select all that apply.

- Central competent authority
- Entities employing the targeted officials
- Other authorities depending on the categories/levels of officials (election Commissions, supreme courts, parliamentary committees, etc.). Please list: _____

The National Integrity Agency is the competent authority to collect asset and interest disclosures. These disclosures are sent before ANI by the focal points within each entity through e-DAI.

The asset and interest disclosures are published on the respective entity's website and on the Agency's website, and are kept throughout the entire mandate or office, as well as 3 years following that. Subsequently, the disclosures are archived according to law.

In the electoral processes, the candidates submit their disclosures before the Central Electoral Bureau in paper format, which subsequently sends them before the National Integrity Agency.

4.2. How are the financial disclosures submitted?

- Centralized submission directly to the central competent authority via:
 - Electronic (online) submission system
 - Submission using the paper submission (*only for the candidates running for offices*)
- Delegated submission using paper submission (e.g., to individual bodies, which store them and transmit them to the competent authority)

- Delegated submission using both paper and electronic (online) submission (*paper declarations are submitted to individual bodies while the electronic copies are submitted to a centralized online system of the competent authority*)
- Other.

4.2.1. Please elaborate on your response above and describe the processes and methods of submitting the disclosures.

Starting with the 01st of January 2022, all asset and interest disclosures are submitted before ANI exclusively through the electronic platform developed by the Agency, entitled e-DAI. *More information on e-DAI shall be provided under question 4.3.*

The deponents fill-in their disclosures through the platform, which are sent, also electronically, to the focal point. This person has the obligation to send the disclosures before ANI through e-DAI platform, no later than 10 days from receipt.

In the electoral processes, the candidates submit their disclosures before the Central Electoral Bureau in paper format, which subsequently sends them before the National Integrity Agency.

4.3. If electronic submission is possible, please describe the online tools and platforms available for submitting financial disclosures.

In May 2021, ANI launched the online platform entitled e-DAI (<https://dai.integritate.eu/>), through which the hundreds of thousands of public officials and dignitaries fill-in and submit their asset and interest disclosures in digital format.

Switching from paper-based disclosures to electronic ones has brought a series of advantages. Among those applicable to the deponent, is the possibility to fill-in the disclosures at any time or place convenient for them, and also saving, updating or modifying versions before submission or using previous disclosures as a starting point for the new one, thus avoiding re-entering the same information for each reporting period.

ANI released a series of new manuals and useful information, which accompany step by step the focal points and deponents in the process of enrollment in the e-DAI platform and submitting of disclosures. Considering the wide range of deponents, ANI also developed video tutorials.

AGENȚIA NAȚIONALĂ DE INTEGRITATE

The screenshot displays the e-DAI platform interface with the following elements:

- Top Navigation:** "Inregistrare persoana responsabilă" (FOCAL POINT ENROLLMENT) and "Manuale" (USER MANUALS).
- Left Column:**
 - Button: "Inregistrare persoana responsabilă" (FOCAL POINT ENROLLMENT) - Pentru înregistrarea unui cont de persoana responsabilă folosind butonul de mai jos.
 - Button: "Autentificare" (E-DAI AUTHENTICATION FOR DEPENDENTS) - Autentificare în platforma e-DAI. Pentru autentificarea în platforma e-DAI folosind butonul de mai jos.
- Center:** ANI Logo (ROMÂNIA AGENȚIA NAȚIONALĂ DE INTEGRITATE).
- Right Column:**
 - Button: "Manuale" (USER MANUALS) - Pentru a descărca manualele de utilizare folosind butonul de mai jos.
 - Button: "Tutoriale video" (VIDEO TUTORIALS) - Tutoriale video. Pentru a putea vizualiza tutorialele video folosind butonul de mai jos.
- Bottom Section:**
 - Button: "Statut utile" (USEFUL INFORMATION) - Pentru a putea descărca statutul util folosind butonul de mai jos.
 - Section: "Probleme tehnice aplicație e-DAI" (CONTACT DETAILS FOR TECHNICAL PROBLEMS) with contact info: email: helpdesk@nai.integritate.eu, phone: +4072 05 90 64.
 - Section: "Privind modalități de completare DA/DI" (CONTACT DETAILS FOR QUESTIONS REGARDING THE FILLING-IN OF DISCLOSURES) with contact info: email: completari@nai.integritate.eu, phone: +4072 05 90 78.

e-DAI platform preview

4.4. Please describe the measures implemented to ensure compliance and appropriate quality of information when completing and submitting the financial disclosure (e.g., disseminating information materials, training, awareness raising, etc.).

Training sessions

The National Integrity Agency constantly organizes training sessions that target both deponents, as well as focal points.

In this regard, we note that only in 2022, in the context of Romania's transition from paper-based asset and interest disclosures to electronically submitted ones through e-DAI, ANI organized training sessions for more than 3.000 de focal points and deponents. The sessions aimed at preventing the faulty filling in of asset and interest disclosures, and in order to meet the needs of the focal points and deponents, subjects regarding the legal regime of incompatibilities and conflicts of interest were also debated.

Moreover, in the context of NIAct project (*Information on NIAct project shall be provided under question 11.2.*) ANI aims to raise awareness with regard to the electronic filling in and submitting disclosures. Within the project, the training sessions are organized in the macroeconomic development regions, and, up to present time, over 150 focal points have been trained.

Guidelines and video tutorials

The National Integrity Agency developed a series of guidelines aimed to complement its prevention activity regarding integrity incidents. Therefore, ANI made available to the interested persons on its website the *Guideline on incompatibilities and conflicts of interest* as well as the *Guideline for filling in assets and interest disclosures*. The *Guideline on incompatibilities and conflicts of interest* specifically targets the main categories of deponents, providing them with the legal provisions applicable to their office. ANI updates the guidelines whenever there are legislative changes that require this.

Moreover, in the context of the aforementioned transition from paper-based assets and interest disclosures to electronically submitted ones, ANI released a series of new guidelines and manuals, which accompany step by step the focal points and deponents in the process of enrollment in the e-DAI platform and submitting of disclosures. Considering the wide range of deponents, ANI also developed video tutorials, which are available on the Agency's website and on YouTube. The aforementioned guidelines and video tutorials have been disseminated by ANI in the past year to the main central and local institutions.

Clarifications on the legal provisions

As one of its earliest prevention measures, at the request of any natural or legal person, the National Integrity Agency issues clarifications on the legal provisions of incompatibilities or conflicts of interest, with regard to the filling in and submitting asset and interest disclosures.

Up to present time, the Agency issued around 15.000 clarifications on the legal provisions referring to possible incompatibilities and/or conflicts of interest situations or regarding the filling in and submitting of asset and interest disclosures to any interested persons.

Focal points within institutions

The focal point within each institution may advise on the content and application of the legal provisions regarding the filling in and submitting of asset and interest disclosures to persons who have the obligation to submit them. Up to this date, over 13.000 focal points are registered in ANI's database on e-DAI platform.

Press releases

The continuous popularization of ANI findings had a deterrent effect in terms of committing integrity incidents by people who have the obligation to declare their asset and interest. Aside from the integrity incidents, ANI can also ascertain indications on committing criminal deeds, such as false statements (misstatement of the truth), which are sent before the competent prosecution bodies. Yearly, ANI issues around 40 press releases, each of which includes ascertainments regarding several public officials and dignitaries..

Ongoing additional measures

In order to meet the needs of newly hired officials, the National Integrity Agency has developed a pilot version of induction packages addressed to categories of persons exercising public offices and dignities (members of Government, MPs, personnel within the dignitary's private cabinets), regarding the legal framework of integrity and is in the process of extending it to other categories of public officials. Moreover, ANI will continue the awareness-raising activities carried out in the context of electoral processes.

Moreover, ANI shall design and develop a digital awareness and prevention platform through which relevant stakeholders will be able to clarify, on their own, certain obligations regarding the integrity framework.

5. Scope of disclosures

5.1. Please list the assets and interests included in the financial disclosure forms, including categories of assets and other financial interests. Please also refer to the list below.

Immovable and movable assets

their value and source

- those (assets) held in the name of others
- Income
 - their source
- Securities
- Investments
- Savings
- Bank accounts
 - Any other business relationships with financial institutions
- Liabilities / loans / mortgage
 - Cash
- Gifts
 - Livestock
- Ownership interests (*shareholdings*) in companies and other legal entities and arrangements
- Business / outside activities (*business interests and financial connections*)
 - License(s) (*to carry out commercial activities*)
 - Usufruct rights (to use and benefit from an asset owned by others)
- Information on all legal persons linked to the official in any way, individual economic activity, membership and position in undertakings, establishments, associations or foundations

Asset disclosures

According to Annex 1 of Law no. 176/2010, persons that fall under the provisions of the aforementioned normative act shall fill in the asset disclosure with the following information:

The introductory section of the asset disclosures shall include identification data relating to the person who is the subject of the disclosure. This information refers to the name of the declarant, position, the personal numeric code and his/her residence.

The first category of assets disclosed in the form includes real estate, namely lands and buildings and addresses thereof, type of property (agricultural, urban, etc.), the year of acquisition, the area, share held by the declarant, the acquisition method and full ownership.

The second section refers to movable goods such as motor vehicles/cars, tractors, agricultural machinery, boats, yachts and other means of transport that are subject to registration by law. The declarant must fill in the form with the nature of the good, the brand or trademark, the number of items, the year of manufacture and the manner of acquisition.

Other goods that must be declared are precious metals, jewelry, art and worship pieces, collections of art and numismatics, objects that are part of the national or universal cultural heritage, whose total value exceeds 5.000 Euros. The declarant shall describe the goods, mention the year of acquisition, and the estimated value of these assets.

The third category refers to movable assets, whose individual values exceed 3.000 Euros, and real estate that were disposed of the previous year.

The asset disclosure contains headings relating to financial assets such as bank accounts, investment funds, credit cards, as well as investments, direct investments and loans granted with the aggregate market value of over 5.000 Euros.

An important part of the disclosure are liabilities of the declarant, such as debts, mortgages or guaranteed leases with aggregate values exceeding the threshold of 5.000 Euros.

The next part of the disclosure refers to gifts, free of charge or subsidized in relation to the market value services or advantages, received from persons, organizations, companies, autonomous regions, national companies or foreign public institutions, including scholarships, loans, guarantees, expense settlements, other than those of the employer, whose individual value exceeds 500 euros.

Last but not least, the asset disclosure form includes the income of the declaring person and family members (i.e. spouse and dependent children) in the last fiscal year.

Interest disclosures

According to Annex 2 of Law no. 176/2010, the introductory section of the interest disclosure includes identification of the person subject to the disclosure, such as name, personal numeric code, home address of the declarant and position held.

The interest disclosure includes sections on:

- The capacity of shareholder in companies, national companies, credit institutions, economic interest groups and membership associations, foundations or other non-governmental organizations;
- Membership in governing, management and control bodies of companies, autonomous regies, national companies, credit institutions, economic interest groups, associations or foundations or other NGOs;
- Membership in professional associations and/or trade unions;
- Membership in governing, management and control, bodies of political parties, whether remunerated or unpaid, the position held and the name of the party;
- Contracts, including legal assistance, legal advice, consultancy and civil contracts, obtained or in progress during the exercise of public functions, mandates or dignities financed from the state budget, local and foreign funds or concluded with companies with state capital or where the state is a majority/minority shareholder.

5.2. Is the requirement to disclose an asset dependent on its value (*e.g., assets below a certain threshold do not need to be declared*)? Please explain.

Please see answer under question 5.1.

5.3. Does the information mentioned in question 5.1 include assets and relevant financial interests located both in and outside the country?

YES

5.3.1. **If YES**, does it require the disclosure of an interest in or a signature or other authority over a financial account in a foreign country (please see article 52, paragraph 6, of the Convention))?

Asset disclosures do not cover an interest in or signature or other authority over financial account in a foreign country, as the asset disclosure is filled in solely by the deponent and it concerns only the assets the deponent / spouse / dependent children own.

5.4. Does your country's financial disclosure system include a declaration of beneficial ownership (of legal entities and arrangements, including nominee arrangements and trusts)?¹

NO

However, it would be relevant mentioning chapter VI of asset disclosure „*Gifts, services or benefits received free or subsidized to market value from persons, organizations, companies, autonomous administrations, companies/national companies or public institutions either Romanian or foreign, including scholarships, loans, guarantees, payments for expenses other than those of the employer, if all their value summed exceeds 500 EURO* (*Are exempted from statement the goods and usual treats received from 1st and 2nd degree relatives)*”

5.4.1. Are the targeted officials required to declare assets and interests held, managed or controlled through such legal entities and arrangements? **YES/NO**

If YES, please explain.

NO

However, targeted officials are required to declare their interests (shares/social parts/value of the benefits) within companies, commercial/national companies, loan institutions, economic interest groups, associations, foundations, other non-governmental institutions. As well, the deponent will declare if she/he is member in management, administration and control within commercial companies, autonomous administrations, commercial/national companies, loan institutions, economic interest groups, associations, foundations or other non-governmental institutions and highlight their value of benefits and the quality held by the deponent.

5.5. Are targeted officials also required to submit information for their family members?

YES

If YES,

a. Please describe the scope of the family members (spouse(s), registered/non-registered partner(s), children (minor, financially dependent, within the same household, age limits, etc.)).

Spouse and dependent children.

¹ On beneficial ownership, please refer to the conference room paper prepared by the secretariat entitled “Good practices and challenges with respect to beneficial ownership and how it can foster and enhance the effective recovery and return of proceeds of crime” ([CAC/COSP/WG.2/2022/CRP.1](#)).

- b. Please describe the type of information that must be submitted for family members. Is it the same as of the public official?

YES

- 5.6. Does the financial disclosure system cover individuals other than the family members of the filers?

NO, but sometimes information included by the deponent might include information about 3rd parties. (e.g. name of the person from whom the deponent has borrowed money)

- 5.7. For subsequent regular financial disclosures, what is the extent of information included in such financial disclosures?

- Information required in the disclosure includes only changes in the equity of the filer since the last disclosure
- A complete new disclosure (i.e., a net worth statement)
- Other, please describe: _____

As previously mentioned under question 2.5., public officials and dignitaries have the obligation to submit disclosures annually, no later than June 15.

The disclosures submitted within 30 days from the date of appointment or election to the public office, within 30 days from the date of termination of the suspension or no later than 30 days after the date of being released from public office, have the exact structure as the annual ones, therefore all information shall be declared.

- 5.8. Does your country's financial disclosure regime require declaring expenditures? **YES/NO**

Please see answer under question 5.1.

If YES, please provide an overview of the relevant features.

6. Access to disclosed information

- 6.1. Is the information on financial disclosure publicly available?

YES

If YES OR YES IN PART

- a. Please describe the measures in place to ensure public access to financial disclosure information (e.g., proactive publication on a central online platform and/or on relevant authorities' websites, ad hoc disclosure in a paper form upon request, etc.)

ANI publishes the disclosures on *The Public Portal of Asset and Interest Disclosures*, which is available on the Agency's website (www.integritate.eu) and makes available to the public over 10 million disclosures. The Portal allows searches to be based on a number of criteria, such as: name of the person, public institution, person's position, date of filling in of the disclosure, county, city, type of disclosure (asset or interest).

At the same time, the disclosures are also published on the website of the entity where the deponents carry out their activity.

The only information that shall be anonymized when publishing the disclosures are those related to personal data protection (e.g. personal identification number, signature, personal address etc.). However, all of this personal information is available, at any time, to the integrity inspectors for evaluation purposes.

Nonetheless, in cases where there are special rules or clauses on ensuring the confidentiality of the income of the declarant or their family members, proof of these aspects is mandatory by attaching to the asset disclosure (i.e. supporting document confirming the existence of the clause, respectively by indicating special rules establishing the obligation of confidentiality), in which case the National Integrity Agency may order the public anonymization of incomes.

In this regard, with reference to the provisions of Law no. 176/2010, the asset disclosures shall be filled in all the fields provided by the disclosure format, including the incomes of the declarant and of their family members realized in the previously concluded fiscal year, following that, for each case and based on the supporting documents attached to the asset disclosure from which results the existence of the confidentiality clause, the National Integrity Agency shall establish on the public anonymization of information on income.

- b. If not all disclosures are publicly available, please list the categories of targeted officials whose disclosures are accessible and/or remain confidential.

N.A.

- c. If only part of the financial disclosure information is available, please list the type of information that is publicly available.

N.A.

- d. Does accessing financial disclosure information entail any costs?

No, accessing disclosures does not entail costs.

- e. Does the publication of financial disclosure provide features to search information by different types of information, e.g., legally and beneficially held entities' names and business addresses, types of assets and interests? Please explain.

Please see answer under question 6.1. a.

- f. Do the means of enabling public access allow for a comparison of the targeted officials' assets and interests over a specific period?

The public portal does not have the feature that would allow instant comparison. However, declarations can be downloaded and analyzed separately.

- g. Are any measures in place to protect the personal information of the targeted officials and their family members, when applicable? Please explain.

Please see answer under question 6.1.a.

- h. Please provide the link(s) to the online platform/resource where financial disclosure information is available to the public, if applicable.

The Public Portal of Asset and Interest Disclosures (<http://declaratii.integritate.eu/>)

- 6.2. Do the relevant competent national authorities (law enforcement, FIU, tax and customs authorities, etc.) have access to the financial disclosures?

YES

If YES or YES IN PART, please explain how such access is granted, including the list of competent national authorities that can access or request access.

Asset and interests disclosures can be accessed by any relevant competent national authorities, either using the *Portal of assets and interests disclosures* held by National Integrity Agency, case in which relevant competent national authorities can examine the statements/disclosures without certain fields that are made anonymous (as mentioned under question 6.1.a.) or simply requesting the disclosures from National Integrity Agency, case in which the relevant competent national authorities will receive the disclosures with personal numerical code of the deponent, personal address and so on.

Moreover, relevant competent national authorities can examine the disclosures on the website of the entity in which the deponent carries out their activity.

7. Verification of financial disclosure information

- 7.1. Is the information disclosed verified?

YES

If YES, please describe the procedures and practices in place to verify the content of financial disclosures, including:

- a. Competent authority that conducts the verification (centralized and/or delegated)

The National Integrity Agency is the institution in Romania with exclusive competence in managing the system of asset and interest disclosures and identifying integrity incidents.

- b. Frequency (regularity) of verifications (ad hoc and/or systematic and routine)

Evaluation of asset and interest disclosures is initiated by ANI upon receiving a complaint from a natural or legal person – the complaints are registered in the Agency's database and, according to art. 9 of Law no. 176/2010, are randomly distributed, electronically, to an integrity inspector, in order to be solved – or based on an ex-officio notification.

Moreover, ANI developed an IT analysis module, which provides integrity inspectors with scoring functions, which facilitates the pre-analysis phase of disclosures with the help of automatic and adaptive mechanisms that can automatically trigger an alert.

- c. Extent of verification (verification of completeness, compliance with disclosure requirements and/or the analysis of the content of the disclosures)

Upon starting an evaluation, the integrity inspectors within ANI verify the compliance with the provisions of the legal integrity framework, that is compliance with the terms for submitting disclosures as well as the legal regime of incompatibilities, conflicts of interest or wealth – in accordance with the nature of the notification. Nonetheless, while conducting an evaluation for an integrity incident, inspectors may ascertain indications on committing criminal deeds. Since ANI is an administrative authority, these cases are sent before the competent prosecution bodies.

- d. Verification processes and methodologies (e.g., manual examination, electronic checks undertaken against other databases or relevant information, etc.)

The integrity inspectors within ANI carry out their evaluation activity in accordance with internal operational procedures, that provide the exact steps and measures to be taken. These operational procedures, which are updated on a regular basis, have also been tailored so that they can incorporate recommendations of different external evaluation mechanisms. Moreover, throughout the evaluation procedure, the integrity inspectors consider the decisions the Courts have issued with regard to the integrity incidents ANI ascertained throughout the years.

The operational procedures entail manual examination, electronic checks undertaken against other databases or relevant information etc.

7.2. How does your country determine which disclosures to verify?

- Annual verification plan(s)
- Periodic mandatory verification of specific categories of officials
- Random sampling of declarations
- Media reports and/or complaints from the public
- Requests from law enforcement / investigative units
- Other, please describe: *ex-officio* notifications

Future development of e-DAI system will allow ANI to scrutinize all the declarations submitted, by applying risk factors in order to identify the most problematic disclosures that might reflect a potential integrity incident, thus streamlining the evaluation activity.

7.3. If applicable, does the electronic financial disclosure mechanism(s) allow for automated verification (cross-checking) of information across various registers and databases held by the public and private entities, such as registries of various assets, company registers, HR, tax and real estate data, etc.?

NO

The future module of verification will only check declarations for internal consistency. The legislative framework would have to be modified to access registers in the automatic verification of declarations. We are checking the declarations to discover the problematic ones and extend our basis for selection of cases. (i.e. that will undergo a full audit)

7.4. Do the competent authorities have timely and direct access to databases and information necessary to verify information in the financial disclosure?

YES

Please explain.

In order to properly carry out the evaluation procedure, the National Integrity Agency has access to certain databases, such as: Tax and salaries database held by National Agency for Fiscal Administration / Department for Population Records and Database Management held by Interior Ministry / National Trade Registry Office held by Justice Ministry.

7.5. Do competent authorities have access to the information held by financial institutions, including bank account records?

YES

Please explain.

The integrity inspectors can and may request documents and information necessary for carrying out the evaluation, to other private or public entities, including banks, which are obliged to provide data within 30 days of receipt of the request.

7.6. Please provide the overall verification rate of financial disclosures in percentages for each applicable verification method.

Please see answer under 7.1.b.

8. Sanctions

8.1. Please provide an overview of sanctions for non-compliance with financial disclosure requirements, including the sanctionable conducts, type of sanctions, forms of sanctions (administrative/criminal) and targeted officials.

Following the finalization of the evaluation procedure carried out by the integrity inspectors, an evaluation report is issued. According to art. 22 of Law no. 176/2010, conflicts of interest and incompatibilities evaluation reports may be challenged by the evaluated person, within 15 days from receipt, by filing proceedings with the administrative Court.

Each time an evaluation report remains definitive on a case of incompatibility or conflict of interests (through a final and irrevocable decision issued by Courts or through not challenging the evaluation report before Courts), the Agency sends it before the institution to which the public official belongs, with the request to apply disciplinary sanctions.

In this regard, according to art. 25 of the aforementioned normative act:

(1) The act on the person who was found to have issued an administrative act, a legal act or has taken a decision or participated in a decision contrary to the legal requirements on conflict of interest or incompatibility is considered disciplinary and is punished according to applicable rules of dignity, position or activity in question, insofar as this law does not derogate from it and if the action does not meet the elements of an offense.

(2) The person removed from office under the provisions of paragraph (1) or towards which the existence of a conflict of interest or incompatibility was found, loses their right to exercise a public position or dignity that is the subject of this law, except for election, for a period of three years after removal from office or public dignity or from the date of mandate termination. If the person occupied an eligible position, they cannot occupy the same position for a period of three years of mandate termination. If the person no longer holds a public office or a dignity when the state of incompatibility or conflict of interest is found, the three years prohibition according to the law, remains valid from the date of the final evaluation report, respectively from the date of the final court irrevocable decision confirming the existence of a conflict of interest or a state of incompatibility.

(3) The act of the person to whom the state of incompatibility or conflict of interest was found, is considered grounds for dismissal or, where appropriate, is considered and is punishable under applicable rules for dignity, public position or respective activity.

(4) By derogation from the provisions of special laws governing disciplinary liability, disciplinary sanctions that may be imposed as a result of having committed the offense of the present law cannot consist in a reprimand or warning.

Moreover, according to art. 26 of Law no. 176/2010, ANI shall send the evaluation report before the disciplinary commission or the disciplinary council, which proposes to the authority provided by law the application of a sanction, according to the law.

With regard to the unjustified cases ascertained by ANI, the evaluated report is sent before the Wealth Investigation Commission in the competent Court of Appeal. These commissions are made up of two judges of the Court of Appeal appointed by the president, including one as President, and a prosecutor from the Prosecutor's Office attached to the Court of Appeal, appointed by the first prosecutor of the Prosecutor's Office. If the Commission finds that the investigation of asset acquisition is not justified, it notifies the Court of Appeal and its ruling can be appealed to the High Court of Cassation and Justice.

If a final and irrevocable disposition is issued by the court to confiscate unjustified wealth, the National Integrity Agency will have the Court decision published in the Official Gazette, and request the National Agency for Fiscal Administration to start the confiscation proceedings. At the same time, the person for whom significant differences between the assets and incomes gained have been ascertained, irrevocably, is considered incompatible and receives an interdiction to hold public positions or offices for a period of three years.

This interdiction shall be taken into consideration each time a person is appointed in a new office.

Moreover, we mention that, according to Law no. 176/2010, ANI can apply the following sanctions to all categories of persons provided by Law no. 176/2010:

- Fine between 10 and 400 Euros for the failure to file, or delay in filing, the asset and interest disclosures (in such a case the evaluation procedure may be initiated);
- Fine between 10 and 400 Euros for non-compliance with their obligations by the persons in public institutions assigned to implement the legal provisions on the asset and interest disclosures;
- Fine between 10 and 400 Euros for the failure to apply the disciplinary action or for the failure to ascertain the end of the public position when the evaluation report remained definitive;
- Civil fine of approx. 40 Euros per each day of delay when the obligation to answer ANI requests is not observed (e.g.: requests related to sending relevant documents for an evaluation file). In such a case, the Agency's integrity inspector prepares the information notice.

According to article 30 of Law no. 176/2010, finding and sanctioning violations of the law shall be made by persons empowered by the Agency according to the Government Ordinance no. 2/2001 regarding the legal regime of contraventions, approved with amendments by Law no. 180/2002, with subsequent amendments.

According to the provisions of art. 31, para. (1) of the Government's Decision no. 2/2001 *on the legal regime of contraventions, as subsequently amended and supplemented, "Against the report on the finding of the contravention and the application of the sanction a complaint may be filed within 15 days from the date of its delivery or communication."*

8.2. Is there any applicable statute of limitations?

YES

Please explain.

According to article 11 of Law no. 176/2010, "*(1) The evaluation activity of the asset disclosure, of data and information on existing wealth and economic changes occurred during the exercise of public positions or dignities, as well as the evaluation of conflicts of interest and incompatibilities shall be done during the exercise of public dignities, and within three years after their termination. (2) The work carried out on period provided at para. (1) consists in the evaluation of the asset disclosure, the data and information on existing wealth, as well as on the economic changes occurred, conflicts of interest and incompatibilities, exclusively for the exercise of public positions or dignity.*"

8.3. Please describe the powers available to the competent authority (responsible for verification of disclosures) to impose and enforce the sanctions described above.

Please see answer under question 8.1.

9. International cooperation and asset recovery

9.1. Does your country (proactively or at the request of another State party) share financial disclosure information with foreign States? **YES/NO**

NO

- 9.2. Does your country cooperate and execute requests received from foreign authorities to assist them in the verification of information in their financial disclosures? **YES/NO**

NO

- 9.3. If applicable, please provide the contact details of the authority responsible for the above types of international cooperation (for exchanging financial disclosure information).

N.A.

10. Good practices

- 10.1. Please provide examples of any good practices in connection with your country's financial disclosure regime that facilitated the recovery and return of proceeds of crime.

The concept of unjustified wealth covers significant differences between the acquired assets and incomes. In this regard, according to the provisions of art. 18 of Law no. 176/2010: *"For the purpose of this law, significant differences shall mean a difference of more than 10.000 Euros or the Ron equivalent of this amount, between the changes in wealth during the exercise of dignities and public offices and the incomes achieved during the same period."* The evaluation procedure regarding unjustified wealth for all officials is regulated by both Law no. 176/2010, as well as Law no. 115/1996 *on declaration and control of the assets of dignitaries, magistrates, persons with management and control positions and public servants, as subsequently amended and supplemented.*

ANI carries out an evaluation procedure, in accordance with the provisions of Law no. 176/2010, and subsequently draws up an evaluation report.

If significant differences are found, the evaluation report is sent before the Wealth Investigation Commission in the competent Court of Appeal. These commissions are made up of two judges of the Court of Appeal appointed by the president, including one as President, and a prosecutor from the Prosecutor's Office attached to the Court of Appeal, appointed by the first prosecutor of the Prosecutor's Office. If the Commission finds that the wealth is not justified, it notifies the Court of Appeal and its ruling can be appealed to the High Court of Cassation and Justice.

If a final and irrevocable disposition is issued by the Court to confiscate unjustified wealth, the National Integrity Agency will have the Court decision published in the Official Gazette, and request the National Agency for Fiscal Administration to start the confiscation proceedings.

Since its establishment, the National Integrity Agency ascertained 189 cases of significant differences between acquired assets and incomes, amounting to approx. 33 million Euros.

Up to present time, the Courts have issued 48 definitive and irrevocable decisions, according to which, approx. 7 million Euros have already been confiscated and returned to state budget.

- 10.2. Do you have any case studies or examples where the financial disclosure regime has enabled or facilitated the recovery and return of proceeds of crime in (or for) your country?

The National Integrity Agency does not deal with proceedings of crime, but with administrative integrity incidents.

In one of ANI's evaluation procedures carried out, significant differences between acquired assets and incomes were ascertained in the case of N.A., General Manager and President of a state-owned company, amounting to approx. 2,7 million Euros.

According to the legal provisions, ANI's ascertainment was sent before Court, and, following the judiciary proceedings, the Court issued the decision to confiscate approx. 1,7 million Euros, which have been confiscated and returned to state budget.

- 10.3. Please provide examples of good practices concerning the operation of your country's financial disclosure system, including policies and measures adopted to enhance compliance with financial disclosure requirements.

PREVENT System

One of the most effective prevention tools implemented by ANI is PREVENT, the integrated information system aimed to prevent conflicts of interest in procurement procedures by setting up an ex-ante verification mechanism to automatically identify situations that may generate conflicts of interest (detecting family ties and close links between bidders or public procurement procedures and the management of contracting authorities) within the procedures initiated through the Electronic Public Procurement System so that they are removed without affecting the procedures. The normative act that rules PREVENT system's operation is Law no. 184/2016 *on the establishment of a mechanism to prevent conflicts of interest in the procedure for the award of public procurement contracts*.

When detecting a potential conflict of interest, the system issues an *integrity warning*. Forwards, it is of paramount importance for the management of the contracting authority to undertake all the necessary measures to remove the elements that generated the conflict of interest (e.g. replacing assessment committee members or, in extreme cases, excluding the bidder). The Agency shall subsequently monitor the measures taken following the issue the integrity warning until the situation that generated it, is removed, and in the event of failure to do so, ANI may start an ex-post investigation regarding the respective possible conflict of interest.

Since 2017, the National Integrity Agency issued through the PREVENT system, 175 integrity warnings for potential conflicts of interest in public procurement procedures amounting to over 440 million Euros.

Moreover, we note that PREVENT System was marked as a good practice within the 2023 European Commission's *Handbook of good practices in the fight against corruption* (<https://op.europa.eu/en/publication-detail/-/publication/df1a5278-ac18-11ed-b508-01aa75ed71a1>).

e-DAI

Moreover, as previously mentioned, ANI developed e-DAI system. The new mechanism digitizes the entire process of filing in, signing, submitting and publishing the disclosures, while maintaining the usual flow and interactions between the public officials and dignitaries submitting the disclosures, the focal points within each public institution and the National Integrity Agency.

On these grounds, ANI's integrity inspectors have real-time knowledge of the persons who fail to submit disclosures in accordance with the legal provisions and, the information generated by e-DAI can be instrumented by the inspectors as risk factors that can contribute to triggering the evaluation activity.

Confirmation of ANI's cases

Complementary to the answers provided under questions 10.1. and 10.2., we note that ANI's incompatibilities ascertainments have a confirmation rate before court of 80%, and the conflicts of interest ascertainments have a confirmation rate of 86%. The evaluation procedure is carried out, initially, through the examination of asset and interest disclosures submitted by the evaluated person.

11. Challenges

11.1. What were the main challenges faced by your country when introducing the financial disclosure system(s)?

Although the obligation to submit disclosures dates back to 1996, there wasn't a specialized entity to manage and publish these disclosures, up to the establishment of the National Integrity Agency in 2007.

Moreover, in 2003, together with the adoption of Law no. 161/2003, *on certain steps for assuring transparency in performing high official positions, public and business positions, for prevention and sanctioning the corruption, as subsequently amended and supplemented*, the legal provisions on incompatibilities and conflicts of interest have been established, but there wasn't an entity to evaluate the compliance with these provisions.

In its first years of operation, ANI faced with the lack of submission of asset and interest disclosures by persons under the legal obligation to do so, or with incomplete filled-in disclosures. However, following the awareness rising measures ANI carried out with regards to the rights and obligations of officials, and also the applied sanctions, the percentage of persons complying with the legal provisions began increasing.

As for ANI's internal challenges, we note that the reduced human resource of the Agency made difficult and long-lasting the processing of the increased number of disclosures submitted annually (approx. 400.000), and, more so in the electoral years (approx. 1,6 million).

With regards to the transition from paper-based filled in and submitted disclosures, to electronic ones, ANI encountered, once again the resistance to change. The Agency carried out various awareness rising campaigns, offered technical support – both written and verbal. Moreover, to meet the needs of the deponents, ANI developed a Chatbot Assistant dedicated to deponents, that offered real-time answers to questions on electronically filling in and submitting disclosures. The electronic method of disclosing assets and interest, also

eliminates the possibility for the deponent to fail to fill in required forms or fill them in incompletely.

E-DAI platform was launched in 2021, and solely throughout that year, deponents have had the possibility to either fill in and submit the disclosures electronically, or on paper format. In this regard, if by the end of 2021, only approx. 2.000 deponents chose to submit their disclosures electronically, by the end of 2022, approx. 400.000 deponents have submitted their disclosures electronically.

11.2. In your opinion, what are the main challenges faced by competent authorities of your country to verify financial disclosures, including accessing information regarding assets and financial interests located abroad?

As the main challenges ANI faces in carrying out its mission and objectives as set forth by law, we note:

A) Lack of financial and human resources

The reduced number of employees. The maximum number of ANI employees is limited by law to 200, but this threshold has never been reached. By the end of 2022, 100 positions within ANI were occupied, of which, 38 positions of integrity inspectors and 12 positions of legal advisers. Even if our Agency constantly organizes competitions for occupying the vacant positions, the unattractive salaries related to the increased workflow represent one of the reasons for which these positions are not occupied.

In 2022, ANI was entrusted with new prerogatives, as, following the promulgation of Law no. 361/2022 *regarding the protection of public interest whistleblowers* ANI was established as an external reporting channel - competent authority to receive reports on violations of the law. For these reasons, ANI will need additional financial resources for more attractive salaries, in order to recruit new human resources, especially among the integrity inspectors and legal advisors, as well as a new office space and new hardware capabilities.

B) Fragmented legislation

Broadly, among the issues ANI encounters in evaluating and sanctioning integrity incidents is the outdated and fragmented legislative framework, which needs greater clarity, coherence and predictability. To meet these needs and to address the issue noted by the European Commission with regard to the “*continued challenges to the legal framework for integrity and the need for stability, clarity and a robust framework*” ANI started the implementation in February 2022 of the EU funded *NIAct* project, in partnership with the Ministry of Justice and Transparency International Romania. The general objective of the *NIAct* project consists in the inventory of all normative acts and the updating of the legal integrity framework, which targets incompatibilities, conflicts of interest and unjustified wealth, but also the system of disclosing assets and interest.

11.3. What are the main challenges faced by your country when imposing and enforcing sanctions for non-compliance?

One of the challenges ANI encounters while imposing sanctions, is the reduced amount of the sanctions. As mentioned under question 8.1., the sanctions vary from 10 to 400 Euros, but, according to the Romanian legislation, if paid within the first two weeks after being applied, the amount of the fine is reduced to half of the minimum amount provided by law.

Moreover, according to the provisions of art. 25 of Law no. 176/2010 presented under the same 8.1. questions, after an evaluation report remains definitive, ANI sends the report before the Disciplinary Commissions where the evaluated person carries out their activity, in order to apply the legal disciplinary sanctions. However, ANI finds various situation in which the Disciplinary Commissions fail to apply these sanctions, apply them with delay or solely apply a verbal or written warning.

12. Follow-up to the special session of the general assembly against corruption

12.1. Please describe any other measures, if any, that your country may have taken to implement paragraph 7² of the political declaration adopted by the General Assembly at its special session against corruption held in June 2021.

PREVENT System

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Since 2017, the National Integrity Agency issued through the PREVENT system, 175 integrity warnings for potential conflicts of interest in public procurement procedures amounting to over 440 million Euros.

Moreover, we note that PREVENT System was marked as a good practice within the 2023 European Commission's *Handbook of good practices in the fight against corruption*

² 7. We will strengthen our efforts to prevent, identify and manage conflicts of interest, including by assessing and mitigating corruption risks and through effective and transparent financial disclosure systems, with information disclosed by appropriate public officials made available as widely as possible, and we will use innovative and digital technology in this field, with due regard for data protection and privacy rights.

<https://op.europa.eu/en/publication-detail/-/publication/df1a5278-ac18-11ed-b508-01aa75ed71a1>).

13. Other

13.1. Please provide any other information you consider relevant to your country's legal framework and practices in connection with establishing an effective financial disclosure system that is not highlighted in the questions above.

For any other information, please do not hesitate to contact Mr. Silviu POPA, Secretary General of the National Integrity Agency, e-mail: silviu.popa@integritate.eu.