

ANTIBIOTICE S.A.'s INTEGRITY PLAN

for the IMPLEMENTATION of the

NATIONAL ANTI-CORRUPTION STRATEGY for 2016-2020

Ref. no.	OVERALL OBJECTIVE: PREVENTION OF CORRUPTION IN ANTIBIOTICE S.A.						
	1. SPECIFIC OBJECTIVE: RENDER COMPANY'S ACTIVITIES TRANSPARENT and IMPLEMENT SPECIFIC ACTIONS TO PREVENT AND FIGHT CORRUPTION						
	Actions	Indicators	Risks	Verification sources	Deadline	Person in charge	Budget
1.1.	Adopt the Declaration of adherence to the fundamental values, principles, objectives and monitoring mechanisms of the National Anti-Corruption Strategy (NAS) 2016-2020 and submit the Declaration to the Technical Secretariat of the NAS.	NAS-compliant drafting of the Declaration and acceptance of its format by the Ministry of Justice	NAS-noncompliant drafting of the Declaration /Delay in the drafting or the submission of the Declaration	The website of the company, www.antibiotice.ro The Ministry of Justice's database	3 months from the approval of the NAS 2016 – 2020 by the Government Decision no. 583/2016	The General Manager of the company	Not applicable
1.2.	Designate the person coordinating the integrity plan implementation and the contact persons in the working group. Define the duties of all designated persons and include them in their job descriptions.	The decision on the designation of responsible people has been issued/The job descriptions have been completed	Delay in issuing the decision/Failure of the persons designated to implement the integrity plan to fulfill their duties appropriately	The Human Resources Unit's records	Q4 2016	The General Manager, the Human Resources Manager	Not applicable
1.3.	Publish the information related to the General Meetings of the Shareholders (GMS) and the decisions adopted in	Convening notices of GMS, useful information for shareholders	Preparation of documents containing irrelevant or incomplete information/ Delays	The website of the company, www.antibiotice.ro	48 hours from the issuance / approval of the documents	The company's secretary / The internal structure responsible for	In conformity with the annual budget approved by the General Manager

	such meetings in an open data format	and GMS' decisions published on the company's website	in or failure to publish the documents			the relations with the shareholders/ The company's Public Relations department	
1.4.	Standardize and render the acquisition process transparent by generating and applying internal operating procedures for acquisitions / Publish the procedures in an open data format	Appropriate drafting and use of internal procedures for acquisitions approved by the company's Board of Directors	Failure to comply with the internal procedures for acquisitions /Failure to publish the internal procedures for acquisitions on the company's website / Failure to communicate the internal procedures for acquisitions to people requesting such information	The website of the company, www.antibiotice.ro	Continually	The managers of the departments involved in acquisition processes/ The company's Public Relations department	In conformity with the annual budget approved by the General Manager
1.5.	Facilitate access to information of public interest by publishing relevant data on the company's administration in an open data format	Publishing the CVs of the company's management team members and decisions of public interest or adopted by the Board of Directors, including financial reports on the company's website	Publishing of incomplete information / Failure to publish the CVs on the company's website	The website of the company, www.antibiotice.ro	Continually	The company's secretary / The company's Public Relations department	In conformity with the annual budget approved by the General Manager

1.6.	Establish procedures and principles for ethical relationships of the company's medical representatives with physicians and pharmacists involved in the promotion / marketing / use of the products the company manufactures, including procedures intended to discourage corruption, promote standardized and transparent sponsorship agreements, acts of hospitality, gift offering and other similar actions	Code of Good Promotional Practices (GPP) for the promotion of prescription medicines and the interactions with health care professionals	Failure to comply with the requirements of the Code of GPP / Ignorance or failure to understand the contents of the Code of GPP / Failure to publish the Code of GPP on the company's website	The website of the company, www.antibiotice.ro / The National Agency for Medicines and Medical Devices' webpage concerning the health care professionals' agreements / Minutes of the courses of training in GPP requirements given to the employees	Continually	Internal Marketing & Sales Manager / Human Resources Manager / Public Relations Dept.	In conformity with the annual budget approved by the General Manager
1.7.	<p>a. Set principles and rules for an honest professional conduct and integrity-based organizational culture</p> <p>b. Establish rules and procedures for the resolution of conflicts of interest</p> <p>c. Review and improve regulations and procedures periodically</p>	The company's Code of Ethics applicable to the employees and managers	Failure to meet the requirements of the Code of Ethics / Ignorance or failure to understand the contents of the Code of Ethics / Failure to publish the Code of Ethics on the company's website	The website of the company, www.antibiotice.ro / Minutes of the courses of training in ethics requirements given to the employees	<p>a. Q2 2016</p> <p>b. Q2 2016</p> <p>c. Continually</p>	The company's managers for the subordinate personnel	In conformity with the annual budget approved by the General Manager
1.8.	In the agreements concluded with partners, include stipulations which discourage or sanction the	Legal counseling structure in the company	Purely formal stipulations / Lack of actual means to verify compliance	The agreements concluded with partners	Continually	The Legal Department of the company	Not applicable

	employees' involvement in corruption deeds or actions		with the stipulations				
1.9.	<p>a. Create an internal division to identify and sanction the violation of the good practice and ethics rules (ethical issues)</p> <p>b. Develop standard operating procedures and specific documents for the registration, record-keeping, resolution, and reporting of the integrity-related notifications and incidents</p>	Ethics and Integrity Council	Failure to identify ethical issues / Non-disclosure of ethical incidents by persons aware of such incidents / False or slanderous notifications	Code of Good Practices, Code of Ethics, Code of Corporate Governance	<p>a. Q1 2017</p> <p>b. Q2 2017</p>	The members of the Ethics and Integrity Council / Employees who take note of deeds considered ethical incidents	Not applicable
1.10.	<p>a. Encourage and protect the integrity whistleblowers</p> <p>b. Develop a set of guidelines for the whistleblowers to include the deeds that may be considered subjects of notifications, possible ways of reporting these, potential recipients, and the protection system provided to them</p>	Generation and maintenance on the company's webpage of an Ethical Form by means of which the violations of the ethical or good practices regulations, and any corruption action that may involve the company can be brought to the company's attention confidentially	Failure to identify ethical issues / Non-disclosure of ethical incidents by persons aware of such incidents / False or slanderous notifications	Code of Good Practices, Code of Ethics, Code of Corporate Governance / The company's webpage	a. Continually	The members of the Ethics and Integrity Council / Employees who take note of deeds considered ethical incidents / The Public Relations Dept.	In conformity with the annual budget approved by the General Manager

Ref. no.	2. SPECIFIC OBJECTIVE: INCREASE the EXTENT to which ANTI-CORRUPTION ACTIONS ARE IMPLEMENTED by APPROVING THE INTEGRITY PLAN and CONDUCTING PERIODIC SELF-ASSESSMENTS						
	Actions	Indicators	Risks	Verification sources	Deadline	Person in charge	Budget
2.1.	Implement and maintain managerial internal control systems	Number of established procedures / Number of risks identified and assessed in the Risk Register / Extent of conformity of the internal and/or managerial control system on the reporting date	Formal nature of the documents and employees' lack of actual involvement	Approved procedures / The Risk Register	Continually	The General Manager / Head of Internal Audit Dept. / The coordinator assigned to implement the NAS	Not applicable
2.2.	Identify the company's risks and vulnerabilities in terms of corruption	Reports which include the number of identified risks and vulnerabilities	Formalism and lack of a methodology for risk identification and assessment	The risk and vulnerability assessment report	Q4 2016	The coordinator assigned to implement the NAS	Not applicable
2.3.	Identify and implement actions to prevent risks and correct company's vulnerabilities to corruption	Reports describing corrective and implementation actions	Formal nature of the process	The risk and vulnerability assessment report	Q4 2016	The coordinator assigned to implement the NAS	Not applicable

Ref. no.	3. SPECIFIC OBJECTIVE: ENHANCE EMPLOYEES' ANTI-CORRUPTION EDUCATION						
	Actions	Indicators	Risks	Verification sources	Deadline	Person in charge	Budget
3.1.	Ensure employees'	Number of	Lack of employees'	Human Resources	According to	Human	In conformity

	participation in periodic training courses on procedures, ethics and good practice regulations	employees who attended training courses / Number and kind of topics included in the professional training programs	involvement / Lack of objective post-training evaluations	Unit records of the employees' attendance at training courses	the annual professional training program	Resources Unit	with the annual budget approved by the General Manager
3.2.	Ensure the participation in programs of education, training and refresher in anti-corruption and anti-fraud practices of the people responsible for the integrity plan implementation	Number of responsible persons who attended training courses	Lack of employees' involvement / Lack of objective post-training evaluations	Human Resources Unit records of the employees' attendance at training courses	According to the annual professional training program	Human Resources Unit / The coordinator assigned to implement the NAS	In conformity with the annual budget approved by the General Manager

Ref. no.	4. SPECIFIC OBJECTIVE: IMPLEMENT THE INTEGRITY PLAN IN THE COMPANY						
	Actions	Indicators	Risks	Verification sources	Deadline	Person in charge	Budget
4.1.	Approve and distribute the Integrity Plan and Declaration of Adherence to the NAS in the company	Approved Integrity Plan / Number of informed employees / Means of information dissemination to employees / Integrity Plan published on the company website	Failure to disseminate the Plan / Formal communication / Employees' misapprehension of the Plan	Approved Integrity Plan / Acknowledgement Form	Q1 2017	The coordinator assigned to implement the NAS	Not applicable
4.2.	Conduct annual	Extent of Plan	Formal nature of the	Assessment Report	Continually	The coordinator	Not applicable

	assessment of the Integrity Plan implementation and its adaptation to the identified risks and vulnerabilities	implementation / New actions, revisions	assessment / Employees' lack of involvement			assigned to implement the NAS	
4.3.	Participate in the monitoring activities communicated by the Technical Secretariat of the NAS	Minutes of / Records of the communications to the NAS	Transmission of incomplete data or delayed transmission	Records of the transmitted information	According to the requirements of the NAS' Technical Secretariat	The coordinator assigned to implement the NAS	Not applicable

General Manager,

Ec. Ioan Nani