

**ANTIBIOTICE S.A.'s INTEGRITY PLAN
FOR THE IMPLEMENTATION OF THE NATIONAL ANTI-CORRUPTION STRATEGY FOR 2021-2025**

No.	THE PLAN'S OBJECTIVE: THE PREVENTION OF CORRUPTION WITHIN ANTIBIOTICE S.A.						
	OVERALL OBJECTIVE NO. 1: INCREASING THE DEGREE OF IMPLEMENTATION OF THE INTEGRITY MEASURES AT COMPANY LEVEL						
	Actions	Indicators	Risks	Verification sources	Deadline	Person in charge	Budget
1.1	Adoption and distribution of the Declaration on assuming an agenda of organizational integrity and adherence to the fundamental values, principles, objectives and monitoring mechanism of NAS 2021-2025 and communication of the declaration to the Technical Secretariat of NAS.	Proper preparation of the Declaration and its transmission to the Ministry of Justice.	1. Non-compliant preparation of the declaration / Delay in the process of drawing up or transmitting the Declaration.	The website of the company, www.antibiotice.ro The Ministry of Justice's database	31.03.2022 according to GD 1269/2021	The General Manager of the company / the Legal and Corporate Governance Department	Not applicable
1.2	Designation of the Coordinator for the implementation of the integrity plan at the level of management position, of the persons responsible for the implementation, as well as of the contact persons at the level of the execution position. Specifying the duties of the designated persons and entering them in the job description. Adoption and distribution of the integrity plan.	Issuance of the decision regarding the appointment of the responsible persons/ completion of the job descriptions / conforming elaboration of the Plan and its transmission to the Ministry of Justice.	Delay in issuing the decision / delay in drawing up the Plan / improper fulfillment of the attributions by the persons designated for the implementation of the integrity chain.	The company's website www.antibiotice.ro / database of the Ministry of Justice / records of the Human Resources Department.	30.06.2022 according to the GD 1269/2021	The General Manager of the company / Legal and Corporate Governance Department / Human Resources Department.	Not applicable

1.3	Annual evaluation of the implementation of the Plan and its adaptation to new risks and vulnerabilities.	Annual preparation of an Evaluation Report.	Lack of Report or its improper preparation.	The company's webpage www.antibiotice.ro	Annually	Legal and Corporate Governance Department.	Not applicable
1.4.	Identifying, analyzing, evaluating and monitoring the risks of corruption, as well as establishing and implementing measures to prevent and control them.	Preparation and completion of the Risk Register / implementation of identified risk prevention measures	Lack of the Registry or its improper preparation / lack of measures to prevent the risks of corruption.	Records of the Risk Management Activity within the Legal and Corporate Governance Department	Annually	Legal and Corporate Governance Department.	Not applicable
1.5.	Identification, evaluation and unitary reporting of integrity incidents, as well as the establishment of prevention and/or control measures following their occurrence.	Preparation of an annual Report on integrity incidents / implementation of measures following the occurrence of integrity incidents.	Lack of the Report or its improper preparation / lack of measures following the occurrence of integrity incidents.	Records of the Legal and Corporate Governance Department	Annually	Legal and Corporate Governance Department.	Not applicable
1.6.	Publication in open-data format of the information regarding the meetings of the General Meeting of Shareholders as well as of the decisions adopted by it.	Convening the GMS, useful information for shareholders and GMS decisions published on the company's website.	Preparation of documents with irrelevant or incomplete information / delays in publishing the documents or their non-publication.	The company's webpage www.antibiotice.ro	48 hours from the issuance / adoption of the documents	Legal and Corporate Governance Department.	According to the annual budget approved by the General Director.
1.7.	Facilitating the access to information of public interest by publishing in open-data format of relevant data on the administration of the company, in accordance with the Standards established by Annexes 4 and 5 of H.G. 1269/2021	Publication on the company's website of the information indicated in Annexes 4 and 5 of GD 1269/2021	Publication of incomplete information	The company's webpage www.antibiotice.ro	Permanent	The Legal and Corporate Governance Department.	According to the annual budget approved by the General Director.

1.8.	Establishing procedures and ethical ways of relating the medical representatives of the company with physicists and pharmacists involved in activities of promotion/marketing/use of products sold by the company including through activities to deter the corruption, standardization and transparency of sponsorship contracts, hospitality, gift giving and other similar actions.	The Code of Good Practice for the promotion of prescription drugs and for interactions with medical professionals.	Failure to comply with the provisions of the code of good practice / ignorance or misunderstanding of the code of good practice / failure to publish the code of good practice on the company's website.	The company's webpage www.antibiotice.ro / NAMMD website regarding the contracts of medical professionals / training minutes of the company's employees on good practice obligations.	Permanent	Marketing and Sales Department / Human Resources Department / Legal and Corporate Governance Department.	According to the annual budget approved by the General Director.
1.9.	Establishing procedures and principles for the sales activity carried out by the employees of the Marketing and Sales Department	Preparation of the Code of Good Practices for the sales activities	Failure to comply with the provisions of the code of good practice in sales / ignorance or misunderstanding of the code of good practice in sales / failure to publish the code of good practice in sales on the company's website.	The company's webpage www.antibiotice.ro / minutes of training of employees of the company on the obligations of good practice in sales	Permanent	Marketing and Sales Department / Human Resources Department	According to the annual budget approved by the General Director.

1.10.	<p>a. Establishing principles and rules for honest professional conduct and an organizational culture based on integrity standards.</p> <p>b. Establishing rules and procedures for resolving conflicts of interest.</p> <p>c. Periodic reassessment and improvement of rules and procedures.</p>	The Company Code of Ethics applicable to employees and administrators.	Failure to comply with the provisions of the code of ethics / ignorance or misunderstanding of the code of ethics / failure to publish the code of ethics on the company's website.	The company's webpage www.antibiotice.ro / minutes of training of the company's employees on ethical duties.	Permanent	The company directors for the subordinate staff.	According to the annual budget approved by the General Director.
1.11.	The inclusion in contracts with partners of clauses that discourage and sanction the attraction of Antibiotice and / or its employees in corrupt practices.	Preparation and inclusion of anti-corruption clauses in contracts.	Formal nature of the clauses / lack of real possibilities to verify compliance with the clauses.	Contracts concluded by the company with partners.	Permanent	Legal and Corporate Governance Department.	Not applicable
1.12.	<p>a. Maintaining an internal structure with duties in identifying and sanctioning violations of the rules of good practice and ethics (ethical incidents).</p> <p>b. The compliance with operational working procedures and a set of specific documents on the registration, recording, resolution and reporting of complaints and incidents of integrity.</p>	Establishment of the Ethics and Integrity Council.	Non-identification of ethical incidents / non-disclosure of ethical incidents by persons who know them / occurrence of false or slanderous notifications.	Code of Good Practice, Code of Ethics, Code of Corporate Governance.	Permanent	Members of the Ethics and Integrity Council / employees who identify facts that represent incidents of integrity or ethics.	Not applicable

No.	SPECIFIC OBJECTIVE NO. 3: STRENGTHENING THE INSTITUTIONAL MANAGEMENT AND THE ADMINISTRATIVE CAPACITY TO PREVENT AND FIGHT CORRUPTION						
Specific objective 3.1	INCREASING THE EFFICIENCY OF PREVENTIVE ANTI-CORRUPTION MEASURES BY REMEDYING GAPS AND LEGISLATIVE INCONSISTENCIES, AS WELL AS ENSURING THEIR EFFECTIVE IMPLEMENTATION						
	Actions	Indicators	Risks	Verification sources	Deadline	Person in charge	Budget
3.1.3	Ensuring the application of the legislation transposing Directive 2019/1937	Drafting the procedure regarding the whistle-blower as well as the reporting of irregularities in relation to the national legislation regarding the protection of the whistle-blower	Lack of the procedure regarding the integrity warning	The company's webpage www.antibiotice.ro	Permanent	Legal and Corporate Governance Department.	Not applicable
		Preparation of the Register of reported integrity incidents / identification of measures adopted to eliminate the causes and circumstances that favored the occurrence of integrity incidents	Lack of the Register or its improper preparation / lack of measures to eliminate the causes and circumstances that favored the occurrence of integrity incidents	Records of the Legal and Corporate Governance Department	Permanent	Records of the Legal and Corporate Governance Department	Not applicable

		Training of employees in connection with the provisions of the procedure regarding the integrity warning.	Lack of training or its improper implementation.	Minutes of training of the company's employees on the procedure regarding the integrity warning.	Annually.	The Human Resources Department.	Not applicable .
Specific objective 3.3	IMPROVING THE FAILURE MANAGEMENT CAPACITY BY CORRELATING INSTRUMENTS THAT HAVE AN IMPACT ON THE EARLY IDENTIFICATION OF INSTITUTIONAL RISKS AND VULNERABILITIES						
3.3.3.	Evaluation of the internal managerial control mechanism from the perspective - ethics and integrity, in order to identify the related vulnerabilities.	Audit of the internal managerial control mechanism from the perspective - ethics and integrity / preparation of an audit report	Lack of audit or its improper performance.	Records of the Audit Office.	Annually.	Head of Audit Office	Not applicable .
No.	GENERAL OBJECTIVE 4: STRENGTHENING THE INTEGRITY IN PRIORITY ACTIVITY FIELDS						
Specific objective 4.5	INCREASING INTEGRITY, REDUCING VULNERABILITY AND RISK OF CORRUPTION IN THE BUSINESS ENVIRONMENT						
	Actions	Indicators	Risks	Verification sources	Deadline	Person in charge	Budget
4.5.4	Strengthen the use of integrity plans as managerial tools to promote organizational integrity in public enterprises	Verification and evaluation of business partners in terms of anti-corruption management system and potential conflicts	Failure to perform checks	Records of the Trade Register / Ministry of Finance / Ministry of Justice	Permanent	Legal and Corporate Governance Department	Not applicable

		of interest					
		Consistent application of organizational anti-corruption tools, management of sensitive functions, associated risks and risk reduction measures	Failure to apply organizational anti-corruption tools	Evidence of the Risk Management / Human Resources Department Activity	Permanent	Legal and Corporate Governance Department / Human Resources Department.	Not applicable
		Strengthening control mechanisms, applying disciplinary sanctions for violating standards of ethics and integrity, number and type of sanctions applied	Failure to apply disciplinary sanctions for violating ethical and integrity standards	Evidence of the Risk Management / Human Resources Department Activity	Permanent	Legal and Corporate Governance Department / Human Resources Department.	Not applicable
		Implementation of internal managerial control standards, number of standards implemented in relation to the legislative requirement	Lack of implementation of internal managerial control standards	Records of the Internal Audit Office	Permanent	Head of Internal Audit Office.	Not applicable
		Strengthening the status, role and trust given to the ethics advisor	Lack of the establishment of the position of ethics advisor	Records of the Human Resources Department	Permanent	General Manager/Human Resources Department.	According to the annual budget approved

							by the General Director
		Consistent application of organizational anti-corruption tools, identification, evaluation and prevention of potential conflicts of interest, number of situations identified and measures applied	Failure to apply anti-corruption tools / tolerance of conflicts of interest	Minutes for training employees on the existence, form and content of organizational anti-corruption tools, as well as tools for preventing situations of conflict of interest	Annually	Legal and Corporate Governance Department / Human Resources Department	Not applicable
4.5.6	Publication in open format of economic and performance indicators	Publication of complete financial data, economic and performance indicators, budgets and grants received	Non-publication of financial data, indicators, budgets, subsidies	The company's webpage www.antibiotice.ro	Annually	Legal and Corporate Governance Department / Strategic Planning and Performance Management Activity	Not applicable

General Director,

Ec. Ioan NANI