

GUIDELINES

on the Conflicts
of Interests



*AmCham Romania warmly thanks the following
members of the Corporate Governance Committee
for their contribution to the elaboration
of the Guidelines on the Conflicts of Interests:*

ASEBUSS

Bondoc & Asociatii

CMS Romania

Dentons

PwC Romania

Roche Romania

Siemens

Telekom Romania Communications

Vodafone

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for its support to the elaboration of the Guidelines on the Conflicts of Interests.*

Purpose of the Guidelines

A

The American Chamber of Commerce in Romania ("**AmCham Romania**") has drawn up this Guide in order to raise the level of knowledge and awareness in relation to conflicts of interests that may arise in both public¹ and private sectors.

This Guide aims to increase the effectiveness of compliance programs and monitoring practices implemented by companies, state entities, or state-owned enterprises, and to help companies and their staff identify, effectively address and prevent potential conflicts of interests. Commonly, these situations arise when a public/private employee's private interests come into conflict with his or her own professional obligations; such conflicts of interests may unduly influence how the employee fulfils his/her official duties and responsibilities. Decisions made in conflict of interests situations often lack objectivity and may result in damages to the public interest and to the stability and functionality of the business environment. For uniformity reasons, the term company is to be used throughout the text, but the Guide can be equally used by state entities and state-owned enterprises.

Romanian legislation regulates conflicts of interests, and any violations are subject to administrative sanctions and criminal penalties. In addition, specific disciplinary sanctions such as suspension of a person's right to practice his/her profession may apply, as provided under the rules regulating certain professions or industries. Persons who have suffered a loss as result of decisions made in a conflict of interests situation can also bring civil claims to seek damages and/or the annulment of the decision made whilst a conflict of interests exists.

Considering the extensive impact of a conflict of interests on the integrity of the business environment, as well as the significant sanctions applicable for conflict of interests violations, companies must take measures to mitigate risks of conflicts of interests. Such measures include implementation of internal policies and guidelines on conflicts of interests, as well as the regular training and monitoring of the employees' awareness of the risks of conflicts of interests. The measures put in place must emphasize the importance of impartiality, integrity and transparency in the decision-making process, as well as their core role in preventing conflict of interests violations.

¹Law no. 193/2017, published in the Official Journal of Romania No. 598 of July 25, 2017, changed the title of Article 301 of the Criminal Code from "Conflict of Interest" into "**Use of Function for Favoritism Purposes**". However, for the sake of consistency, the term "**conflict of interests**" shall be used throughout this Guide.

This Guide includes:

- recommendations for companies and employees regarding prevention of conflicts of interests;
- frequently asked questions in relation to what constitutes a conflict of interests and a selection of case studies to exemplify conflict of interests situations; and
- a sample of a conflict of interests declaration and register, attached as annexes to this Guide.

This AmCham Romania initiative relies on the support of its members, who are hereby called to share and disseminate this Guide within their companies, in correlation with any relevant policies applicable at company level, as well as with the requirements applicable to the industry sector in which the company performs its business.

B

guidelines for companies

Guidelines for Companies

I. What are conflicts of interests?

In basic terms, the generally accepted definition of the conflict of interests is - **any situation where a public or private person exercising a particular function or holding a certain office, irrespective of the type of entity (public or private):**

- **has a personal interest of a patrimonial nature that influences the objective fulfilling of the duties he/she has been assigned by virtue of the function exercised or the office held; or**
- **has the possibility to anticipate that a decision of the entity the person belongs to, in which the person concerned may have some degree of input, will bring a benefit to him/her and/or to his immediate family and/or close relatives.**

In other words, the conflict of interests is a set of circumstances that may affect, impair or influence an individual's ability to apply unbiased judgement in a certain situation, to exercise his/her role with fairness, or to make an unbiased decision in spite of a secondary interest. A conflict of interests may occur in any situation where an individual of an organization (private or government) exploits a professional or an official role for personal or other benefit.

Conflicts of interests may also occur where there are circumstances that create a risk of biased decisions, regardless of whether the individual or the company in question benefits as a result. Likewise, the simple perception that

there is a case of competing interests, impaired judgement or undue influencing of the decision-making process may also amount to a conflict of interests.

Conflicts of interests are more likely to arise where individuals or companies are transacting with a third party, especially as there are implicit risks associated with commissioning and procurement, staff recruitment, leaving public office and partnering with private firms, and receiving gifts and other such transactions. Companies should manage this risk by implementing appropriate safeguards around these operations.

Furthermore, since prevention is simpler than finding a conflict of interests, it is important to highlight the principles behind the prevention of conflicts of interests, namely: impartiality, integrity, transparency of the decision and the supremacy of the **public/private** interest, as the case may be.

Moreover, in order to take preventative measures and apply gradual sanctions, it is essential to be able to identify the following types of conflicts of interests:

Potential conflicts of interests - where a person with a personal interest anticipates that a decision he/she is about to make, or contribute to, may result in some kind of benefit to that person, and potentially to his/her immediate family, close relatives or partners as well.

Ongoing conflicts of interests - where a person with a personal interest is in a position to make a decision that can bring him/her a benefit of some kind, and potentially to his/her immediate family, close relatives or partners as well.

Consumed conflict of interests - where a person makes a decision that actually brings him/her a benefit of some kind.

Conflicts of interests might occur if individuals have, for example:

- o a direct or indirect financial interest;
- o a non-financial or personal interest; or
- o conflicts of loyalty where decision-makers have competing loyalties between the companies to whom they owe a primary duty, and some other person or entity.

2. Consequences of not recognizing the risk of conflicts

It is important to manage conflicts of interests. Not only can they bring a company into disrepute (specifically in relation to any decision-making), but often the perception of conflict alone is enough to cause concern. This can lead to reputational damage and undermine public confidence in the integrity of institutions.



The failure of an individual or company to recognize a conflict of interests can give the impression that the individual/company is not acting in the public interest. Moreover, if left unresolved, some conflicts can result in criminal action, for example fraud, bribery or corruption through abuse of position.

There is also the potential risk of legal challenges to decisions made by public bodies. If a decision-maker has a conflict of interests then the decision is potentially vulnerable and could be overturned upon judicial review.

3. Managing conflicts of interests – good practice

3.1 Prevention

3.1.1 Promoting the principles underlying the prevention of conflicts of interests, namely impartiality, integrity, transparency in relation to decision-making and, in this case, the supremacy of the interest of the company. All such principles must be considered in compliance with the legislation in force, by regular presentation and dissemination of these principles across the company by means of training sessions, workshops etc.

3.1.2 Promoting ethical standards, by having a code of ethics or code of conduct, with which staff must regularly confirm compliance. These standards should define what behaviors and practices are/are not acceptable. They should clearly state what will happen when people do not comply.

At the same time, for the implementation of these and other principles in this field, it is advisable to designate an ethics officer or a person to supervise compliance with such principles, including advisory services, and to focus on prevention.

3.1.3 Identifying, understanding and managing conflicts of interests, in order to make everyone aware of what to do if they suspect a conflict, and to ensure that decision-making is efficient, transparent and fair.

The way a company decides to manage conflicts should reflect the risk of exposure to conflicts. They should recognize the risk of conflicts of interests in company's policy, procedures or guidance, including what to do in cases where there is potential for conflict. This could be addressed explicitly in a 'conflicts of interests policy' or in other guidance covering risky areas such as procurement or HR. The procedures should always comply with applicable law and good practice.

3.1.4 Transparency is the key element. Companies must ensure that a nominated team or individual collates and maintains up to date an organizational **register of interests** (an example of which can be found in Annex 2

of this Guide). An interest should remain on the register for a minimum period (e.g. 6 months) after the interest has expired. Companies should retain a private record of historic interests for a minimum period of time (e.g. 4-5 years) after the date on which they expired.

3.1.5 Using internal tools and mechanisms specific to each company, namely internal audit, internal managerial control, integrity alert and preparation of ROFs/ROIs.

It is essential that the internal procedures (ROF, ROI), which regulate the activity of the employees of a company, should contain a special chapter dedicated to INTEGRITY and to any and all aspects arising from it.

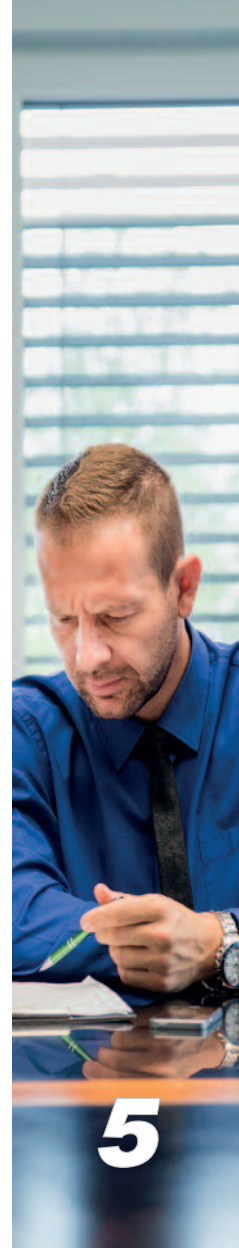
At the same time, it is highly recommendable to focus on prevention of conflicts of interests within the company, by continuously informing and training the employees. It is equally important to promote the proactive involvement of all those who play a role in preventing conflicts of interests.

As for the declaration and recording of conflict of interests, companies should define and provide template forms for the declaration of interests and for the register of interests, respectively, containing the following information:

- The employee's name and his/her role with the company;
- A description of the interest declared; and
- Relevant calendar dates relating to the interest declared.

All staff should declare their interests and, as a minimum, companies should maintain registers locally and publish the interests of decision-making staff at least annually, in a prominent place (such as the company's website or intranet). The format of published registers should be accessible and contain meaningful information. The template forms for the declaration of interests and for the register of interests, respectively, are attached herewith as Annex 1 and 2.

Companies should also be mindful in relation to gifts and other benefits, because accepting significant gifts or hospitality creates a perception of biased decision-making even if the gift has no bearing on a person's/company's judgement. Corporate hospitality or other expenditure should be reasonable and proportionate. We recommend that companies have sufficient arrangements in place for employees to declare and register gifts and other benefits that they have received, and they should decide the situations and circumstances in which they require staff to report offers of gifts, hospitality and other benefits, and where permission must be sought prior to their acceptance.



3.1.6 Companies should make sure that the decisions are made independently by enforcing internal policies.

An internal policy should require staff and contractors to routinely declare all their private, personal and financial interests, which are relevant to:

- decision-making,
- management of contracts, or
- giving policy advice.

Usually this should be completed annually in addition to ad-hoc declarations as conflicts arise, such as during a procurement exercise.

Where conflicts of interests do arise, these should be clearly detailed, for example in the minutes of meetings, including a record of the action taken to manage the conflict. The company should establish clear rules on abstention and withdrawal from decision-making when participation places an individual in a conflicted position. If the conflict cannot be resolved in any other way, options could include divestment, recusal, transfer, restriction of activity or resignation.

3.2 Detection and response

A principles-based system assumes that people will act honestly and that they shall willingly provide information about their conflicts and will exclude themselves from decision-making where such conflicts do or may exist. However, there should also be prompts and checks to reinforce these principles, in particular there where the risk of conflicts of interests is high. Preventative measures must be supported by proportionate mechanisms to detect non-compliance, and implement sanctions where appropriate.

Companies should put in place management, internal controls and independent oversight systems to detect breaches of policy, including external oversight arrangements, and a reporting system such as whistleblowing arrangements for staff to raise concerns regarding deviation from professional integrity policies.

3.3 Sanctions

In cases of non-compliance, there should be a system of proportionate, enforceable sanctions in place, which include measures leading to personal consequences (such as disciplinary action, dismissal or prosecution) and management actions (for example, retroactive cancellation of a decision or contract). Where appropriate, measures such as recusal (permanent or temporary withdrawal from duties) or divestment (the removal or sale of the official's private interests, or a transfer of ownership) should also be considered.

3.3.1 Disciplinary sanctions

Staff who fail to disclose any relevant interests or who otherwise breach company's rules and policies relating to the management of conflicts of interests are subject to investigation and, where appropriate, to disciplinary action. This may include:

- Employment law action, such as:
 - **Informal action** such as reprimand or recommendation for additional training and/or guidance, or participation in the drafting of documents dealing with integrity issues; or
 - **Formal action** such as a formal warning, the requirement for additional training, re-arrangement of duties, re-deployment, demotion or dismissal.
- Referring incidents to regulators.
- Contractual actions against companies or staff.

3.3.2 Civil sanctions

If conflicts of interests are not managed effectively, companies could face civil challenges to decisions they make – for instance if interests were not disclosed that were relevant to the bidding for, or performance of, contracts. In extreme cases, staff and other individuals could face personal civil liability, for example a claim for misfeasance in public office.

3.3.3 Criminal sanctions

Failure to manage conflicts of interests could lead to criminal proceedings including for offences such as fraud, bribery and corruption. This could have implications for the company concerned, any linked companies, and the individuals who are engaged by them.



If you find yourself in a position where your personal and business interests come into conflict, you are required to discuss this with your relevant team (e.g. HR, Compliance, Legal) from your company.

To help you decide whether you are facing a conflict of interests, imagine you are explaining your situation and your proposed actions to friends, a colleague or the media, and consequently considering whether you would feel comfortable to carry out such actions (the “**Newspaper Test**”).

Here are some examples of where you might face a conflict of interests:

1. Outside activities or investments

You may have a personal interest in one of your company’s suppliers, competitors or customers, which might affect your business. This interest could be in the form of an investment, involvement in operational activities, or a relationship with the management of the company or with the person concerned.

2. Friends, relatives and co-worker relationships

Business relationships with relatives, spouses, significant others or close friends can often lead to conflicts of interests which can be difficult to resolve. Similarly, close relationships between co-workers can (depending on the work, roles and respective positioning of the co-workers) create an actual or apparent conflict of interests. If you are faced with the possibility of such a business or personal relationship, you should discuss the matter with your manager.

3. Political involvement

Using any company’s resources such as time, property, cash, equipment or branding for political activities could cause a conflict of interests.

What does this mean for me?

The company expects you to:

- Act in its best interests, recognizing potential conflicts of interests;
- Discuss concerns with your line manager and report conflicts to your local relevant team;
- Remove yourself from any business areas in which you have a personal interest;
- Not provide sensitive information to a competitor or a third party;
- Not make political donations in your company's name; and
- Check laws and your company's own internal policies and requirements before making investments.

You must tell your manager, HR or the relevant team about:

- Any other employment or board memberships undertaken by you;
- Any close relationships you have with people in your reporting chain;
- Any close relationships you have with people going through the recruitment process, especially where you have a degree of influence over decisions to recruit or award contracts; and/or
- Any close relationships you have with people who work for competitors, major customers, suppliers or other business partners. This is particularly important if you have access to sensitive information.

You must not:

- Get involved in the hiring, supervising, management or career planning of any relative or friend;
- Let your personal relationships influence, or be seen to influence, your decisions at work;
- Give sensitive or confidential information to anyone outside of the company;
- Use your company's resources to promote political activities; or
- Have any dealings with your previous employers until you have worked for your current company for a significant period of time (e.g. 1-2 years).



Q1: Aside from my usual job, I also work part-time for my family business. Do I need to declare this to my company?

A: Yes, even if the business is not related to your company. In some countries, including Romania, there are restrictions on the number of hours you can work. Breaching these rules might affect your health and the quality of your work. It could also result in a fine for your company. You must tell your manager and HR about any other employment or board memberships undertaken by you.

Q2: A close friend is applying for a job in my company. Is this OK?

A: You are entitled to recommend the company as a great place to work. However, you must ensure that you are not involved in the recruitment process, and the job role in question should not be one where your friend would be reporting to you. Remember, you must not get involved in the hiring, supervising, management or career planning of any relative or friend.

Q3: When recruiting an individual who might have a personal interest in a supplier, client or competitor which influences or could influence his decisions at work, is this a conflict of interests?

A: Yes, these situations should be treated as potential conflict of interests, especially if a management, procurement or sales position is recruited. Such a situation should be declared and mitigated by the relevant department (e.g. HR, compliance or legal) in accordance with the internal conflict of interests policy.

Q4: When recruiting an individual due to their significant connections with political parties or government agencies, which you intend to leverage for company's benefit, is this a conflict of interests?

A: Yes, these cases should be considered as conflict of interests and should be addressed accordingly. Any relationship or engagement with public authorities or officials should be avoided as some conflicts, if left unresolved, can result in criminal action, for example fraud, bribery or corruption through abuse of position.

Q5: A procurement manager purchased raw materials at inflated prices from a vendor in whom he had undisclosed interest. The vendor was owned (100%) by the procurement manager's wife. The purchasing manager used his influence to ensure that his company will continue doing business with the vendor. Does this situation represent a conflict of interests and why?

A: Yes, this is an actual conflict of interests as the procurement manager has a direct financial interest in contracting with the company owned by his wife.

Q6: As an example, what do you do when you suspect a potential conflict of interests?

- a) Nothing;
 - b) Disclose the potential conflict to your supervisor or relevant department;
 - c) Obtain more information in order to better understand;
 - d) Stop the activity.
- A:** The recommendation is always to disclose any potential conflicts to your supervisor or relevant department. As cases may vary widely, there might be different solutions available: recusal (permanent or temporary withdrawal from duties) or divestment (such as the removal or sale of the official's private interests, or transfer of ownership).

Case Studies and Other Examples

I. Disclosure of business interest

Situation: I am a member of a project team which works on an outsourcing project. I am currently preparing documents for a tender. A friend of mine has heard about the project and asked me if the company he manages is allowed to participate in the tender. How do I proceed?

- o As a general rule, you must not award or take part in the awarding of business to a company in which you, or a family member, or a friend has an interest in, without prior disclosure of such fact.
- o Disclosure to your line manager and your compliance department is required if your friend is intending to participate in the tender process.
- o Your line manager and compliance department will jointly agree on the best solution to avoid the occurrence of a conflict of interests.



2. Disclosure of business interest

Situation: My wife is the majority shareholder in a company which provides maintenance services for my department (I work in the maintenance department). Is this a conflict of interests?

- It depends on the details of the case. First, you need to disclose the situation to your line manager and Compliance.
- In order to determine if the conflict of interests is real, your line manager will take into account the position you have and whether you can perform your job requirements without being affected by the connection with your wife's company. In the performance analysis, your line manager will assess whether you have been involved in the evaluation of your wife's company or in the negotiation of its contract; also if you have any responsibility regarding the evaluation of the quality of services performed by the company.
- Conclusion: not all apparent conflicts of interests materialize. The analysis of the particularities of the situation can lift existing suspicions and you can continue your activity in the company.

3. Investments

Situation: You are pleased by the quality of services provided by one of your company's suppliers. For some time you have been thinking about investing some money you have saved into a company and this could be a great opportunity. Is it ethical to become a shareholder of this company, whilst also being a company employee at the same time?

- The recommendation is to avoid any involvement with competitors or companies with which your company has (or is about to have) business relations, because it is possible that your capacity to act properly/without bias on behalf of the company could be affected.
- However, if you decide to go forward with the investment, you must get prior approval from your line manager and your compliance department.

4. Competing with the company and outside jobs

Situation: : I am working as an accountant in the company's financial department. To increase my income, I am thinking about taking up a part time job as a consultant on financial matters for competitor "X". Is there any reason why I shouldn't go ahead with this?

Answer: Yes. As long as you are working for your company you should refrain from any actions (direct or indirect) which could support one of your company's competitors.

5. Discounts and other benefits

Situation: My department frequently works with a transportation company. In a conversation with the transportation company's manager, I mentioned that I am moving to a new apartment. The manager offered me their services free of charge as a "special offer". Should I accept?

Answer: You need to disclose this to your line manager and your compliance department. Your line manager and compliance department will ask you not to accept the offer because the manager's intention is to try and influence your decision-making in order to secure future work from your company by putting you in a position where you feel indebted to him.

General rule:

You must not accept personal discounts or other benefits from business partners or competitors of the company, especially when those discounts or benefits are not offered to all of the employees of your company.

6. Procurement (Tendering)

Situation: Adrian is a senior technical specialist in the department of Company A. His team has identified a need to enlist the help of an external company in order to develop a special product for the department. The anticipated cost will be EUR 250,000, and the job will therefore be subject to a tender. Adrian is nominated to chair a panel of three to develop the Request for Tender and subsequently evaluate the tenders received.

Adrian's brother-in-law runs a small company, Company B, which does work in this area. Adrian doesn't, however, mention the opportunity to him. He also does not disclose to the rest of the panel that his brother-in-law might tender.

When Company B submits an application, Adrian tells on the rest of the panel about the conflict of interests and reports it to his Executive Director. When he meets with his Executive Director to discuss the situation, they both agree that there is no-one else with expertise in this area who can take Adrian's place on the tender



evaluation panel. The Executive Director decides to keep Adrian on the panel, but to oversee the panel's evaluation process herself.

The panel awards the contract to Company B. One of the unsuccessful tenderers writes to the Company saying the process was corrupt.

Are there any conflicts of interests which have not been addressed?

After his brother-in-law's company applied for the contract, Adrian acted appropriately by **reporting** the **actual** conflict of interests to the Executive Director and then **recruiting** her to oversee the tender evaluation. (With particularly high-risk projects, it is sometimes appropriate to recruit external probity advisers to fulfil this function).

However, Adrian did not report the **potential** conflict of interests when the tender proposal was being developed. This means that a reasonable person might later argue that Adrian was able to influence the design of the tender brief to benefit his brother-in-law prior to reporting the conflict. The later involvement of the Executive Director in overseeing the evaluation process could not remedy this **perception** of a conflict of interests.

Possible outcomes: In the circumstances, it is not clear whether Adrian's failure to report the potential conflict of interests straight away taints the process to the extent that it needs to be re-tendered. However, it has resulted in uncertainty and delay which could have easily been avoided if Adrian had disclosed knowledge of his brother-in-law's potential interest at an earlier point.

Tips to remember:

Carefully consider whether potential or perceived conflicts of interests might apply to your work. Reporting the matter early may avoid future uncertainty and expense.

General recommendations:

1. Anyone involved in the procurement process should pass the Newspaper Test (see **Section C: Guidance for Employees**).
2. A list of vendors in which an individual has interest should be attached to their conflicts of interests declaration.

7. Other possible situations and examples of conflicts of interests

- The company in which a shareholding is owned by the person concerned and the members of his/her family or by any individual with whom the person concerned and his/her relatives has/have patrimonial relationships, have enjoyed or enjoy any kind of benefits, with the introduction of a time limit (2, 3 years, for example), participate(s) in the procurement process;
- The person concerned is responsible for providing logistics services and, having a personal interest, he/she selects as the provider of such services a company owned by a member of his/her family or by an individual from whom he/she has received or receives benefits of any kind;
- A maintenance company engages in lobbying by contacting a company employee who, despite not being able to directly hire that maintenance company, may nevertheless use his/her position in the company to influence the decision of his/her superior who is in charge of selecting the maintenance company;
- A husband and wife work in the same department within a company, where the wife is the department manager. The wife decides, without undertaking an objective evaluation of her subordinates, to promote her husband by awarding him a high score in the performance evaluation, thereby helping him get a raise in his salary;
- The manager of the procurement department is informed about the company's intention to purchase subscription-based healthcare services for its employees. The procurement manager knows that his/her spouse/a relative/any other person from whom he/she has received or receives benefits of any kind owns a company that provides such healthcare services and decides to pull some strings in order to help that private healthcare provider win the contract;
- The manager of the HR department decides to hire a relative or any other person from whom he/she has received or receives benefits of any kind;
- A company manager changes the organizational chart of his/her company so that he/she may hire a relative or a person from whom he/she has received or receives benefits of any kind.



TEMPLATE INTERESTS DECLARATION FORM

| Name | Role | Description of Interest | Relevant Dates | | Comments |
|------|------|-------------------------|----------------|----|----------|
| | | | From | To | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

Please see below for information on how to fill in the above boxes.

The information submitted will be held by *[company name]* for personnel or other reasons specified on this form in order to comply with *[company name]*'s policies. This information may be held in both manual and electronic form in accordance with the relevant privacy legislation. Information contained herein may be disclosed to third parties in accordance with the relevant legislation to comply with requests for access to information of public interest, and shall be published in registers that *[company name]* holds.

I confirm that the information provided above is complete and correct. I acknowledge that any changes in these declarations must be notified to *[company name]* as soon as practicable. I am aware that if I do not make full, accurate and timely declarations then civil, criminal, internal disciplinary or professional regulatory action may result.

Signed:

Date:

Please return this form to *[insert contact details of individual/team]*

Guidance Notes for Completion of Specimen INTERESTS DECLARATION FORM

Name and Role: Insert your name and your position/role in relation to the Company you are making the return to.

Description of Interest: Provide a description of the interest that is being declared. This should contain enough information to be meaningful (e.g. detailing the supplier of any gifts, hospitality, sponsorship, etc). That is, the information provided should enable a reasonable person with no prior knowledge to be able to read this and understand the nature of the interest you declare.

Types of interest:

Financial interests – where an individual may get direct financial benefits from the consequences of a decision they are involved in making;

Non-financial professional interests – where an individual may obtain a non-financial professional benefit from the consequences of a decision they are involved in making, such as increasing their professional reputation or status or promoting their professional career;

Non-financial personal interests – where an individual may benefit personally in ways which are not directly linked to their professional career and do not give rise to a direct financial benefit, because of decisions they are involved in making in their professional career;

Indirect interests – where an individual has a close association with another individual who has a financial interest, a non-financial professional interest or a non-financial personal interest, who would stand to benefit from a decision they are involved in making.

A benefit may arise from either a **gain** or the **avoidance of a loss**.

Relevant Dates: Specify the date when the interest arose and, if relevant, the date when it ceased.

Comments: This field should detail any action taken to manage an actual or potential conflict of interests. It might also detail any approvals or permissions to adopt certain course of action.

TEMPLATE INTERESTS REGISTER

[COMPANY NAME] REGISTER OF INTERESTS OF [DECISION MAKING] STAFF

Date of Publication: [INSERT]

| No. | Name | Role | Description of Interest | Relevant Dates | | Comments |
|-----|------|------|-------------------------|----------------|----|----------|
| | | | | From | To | |
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Other examples and information on interest registries are available at the addresses below:

1. The declaration of interests under Law no. 176/2010: the sample declaration is available on ANI website <https://www.integritate.eu/A.N.I.-interactiv/Documente-%C8%99i-formulare.aspx>;
2. Law no. 477/2004 on the Code of conduct for contracted staff of public authorities and Institutions is available on the Ministry of Justice website, at <http://legislatie.just.ro/Public/DetaliiDocument/57028>;

3. The Declaration of Interests filled in and posted by local public officials, in accordance with the sample declaration established by Law 393/2004 on the public official's status; this law is available at <http://legislatie.just.ro/Public/DetaliiDocument/55664>;
4. The document by which MEPs declare their gifts is available for consultation http://www.europarl.europa.eu/pdf/meps/926700_I_RO_Annexe%20I_Gifts_DEF.pdf;
5. The Single Register of Interest Transparency is available on project's own website, at <http://ruti.gov.ro/wp-content/uploads/2016/10/Memorandum-privind-instituirea-RUTI.pdf>.





The American Chamber of Commerce in Romania (**AmCham Romania**), the first choice for advocacy and business growth in Romania is a leading business association in Romania that represents over 400 members, U.S., international and Romanian companies whose investments in Romania exceed USD 20 billion and have created over 250.000 jobs.

AmCham Romania is firmly committed to facilitating an open dialogue between the business community and central authorities, promoting measures and priorities for an improved business climate and increased economic competitiveness for Romania, at a regional, European and global level.

AmCham Romania is an affiliated member of the **U.S. Chamber of Commerce** and **AmChams in Europe**.

For more details, please visit us at:

www.amcham.ro

Facebook/AmCham Romania

LinkedIn/AmCham Romania

amcham@amcham.ro

Union International Center, 4th Floor

11 Ion Campineanu St., Bucharest 1



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