

Electrica S.A.	Policy regarding gifts, protocol expenses and prohibition of facilitation payments	Cod: ESC-P-3
	Ensuring compliance with the principles of granting and receiving gifts, protocol expenses and prohibition of facilitation payments within the Electrica Group	Ed. 1, Act. 1
		Page: 1/11

## Policy regarding gifts, protocol expenses and prohibition of facilitation payments

### **Intellectual property:**

This document and all documentation describing the management system of ethics, sustainability and compliance are the exclusive property of S.D.F.E.E. Electrica S.A.

Electrica S.A.	Policy regarding gifts, protocol expenses and prohibition of facilitation payments	Cod: ESC-P-3
	Ensuring compliance with the principles of granting and receiving gifts, protocol expenses and prohibition of facilitation payments within the Electrica Group	Ed. 1, Act. 1
		Page: 2/11

### DISTRIBUTION LIST

No.	Organizational Entity	Position	Full Name
	All organizational entities	Every position	Entire staff

### THE CHECKLIST OF EDITIONS/UPDATES

No.	Date	No. paragraph	Brief of changing content	Author of edition/update
1	16.12.2015		The policy development	SESC

Electrica S.A.	Policy regarding gifts, protocol expenses and prohibition of facilitation payments	Cod: ESC-P-3
	Ensuring compliance with the principles of granting and receiving gifts, protocol expenses and prohibition of facilitation payments within the Electrica Group	Ed. 1, Act. 1
		Page: 3/11

## SUMMARY

**Distribution list**

**The checklist of editions/updates**

<b>AIM.....</b>	<b>4</b>
<b>APPLICABILITY.....</b>	<b>4</b>
<b>DEFINITIONS .....</b>	<b>4</b>
<b>THE PRINCIPLES OF THE POLICY .....</b>	<b>5</b>
<b>RULES OF ENFORCEMENT .....</b>	<b>10</b>
<b>REPORTING OF NON-COMPLIANCE.....</b>	<b>14</b>

Electrica S.A.	Policy regarding gifts, protocol expenses and prohibition of facilitation payments	Cod: ESC-P-3
	Ensuring compliance with the principles of granting and receiving gifts, protocol expenses and prohibition of facilitation payments within the Electrica Group	Ed. 1, Act. 1
		Page: 4/11

## Aim

In accordance with the Code of Ethics and Professional Conduct, the Organisation commits, through the ethics, sustainability and compliance department/ officer to carry out of its operations in terms of ethics and integrity, transparency, and openness to dialogue with stakeholders. The aim of the policy regarding gifts, protocol expenses and prohibition of facilitation payments is to protect the Organisation against ethical breaches, and any other issues of noncompliance that could harm the reputational, commercial, and financial or could lead to legal sanctions, reducing the Organisation's prestige and profitability, on both short and long term.

## Applicability

This policy is applicable to all personnel of Electrica SA and its subsidiaries, in all the activities performed for or on behalf of the Organisation

## Definitions

**Organisation** – The ensemble of Electrica S.A.'s structures and its subsidiaries, and other entities from the group, whether they have legal personality or not.

**Personnel/ Electrica's personnel** – The management, employees and any other persons working within or on behalf of the Organisation, with or without decisional power, paid or not, no matter the legal form of the agreement they have with Electrica S.A, its subsidiaries and other entities, with or without legal personality, inside the group.

**Facilitation payments** - A supplementary payment made to induce a person to properly perform their duties, which can lead to preferential treatment.

**Personal interest** – any material advantage or of another kind, pursued or obtained directly or indirectly by Electrica's personnel, for themselves or for others, by using their reputation, influence, facilities, relations, information they have access to, as a result of performing their duties.

**Gift** – any advantage, material benefit or of any other kind offered during or in connection with the professional duties of Electrica's personnel, by a person or legal entity the Organisation undertakes, or intends to undertake business relations with. Gifts are considered to be, without being limited to: vacation invitations, invitations to unofficial events, financing travel expenses, others than the ones that are in the interest of the organisation, goods and services, remunerations, rewards that are not subject to the personnel motivation policy, facilities or privileges of any kind.

**Delegation and detachment expenses** - expenses covered by Electrica, consisting in transportation, accommodation and meals costs, for its own personnel participating in the activities resulting from carrying out contracts in which Electrica is a party or in national or international events organised in its interest, or of its interest, where Electrica's personnel is delegated to take part in, by reasons of their duties.

Electrica S.A.	<b>Policy regarding gifts, protocol expenses and prohibition of facilitation payments</b>	<b>Cod: ESC-P-3</b>
	<b>Ensuring compliance with the principles of granting and receiving gifts, protocol expenses and prohibition of facilitation payments within the Electrica Group</b>	<b>Ed. 1, Act. 1</b>
		<b>Page: 5/11</b>

**Protocol expenses** – the expenses covered by the Organisation for hospitality, events, and business meals carried out in its interest, where its personnel and on a case by case basis, business partners, invited by Electrica take part in.

**Travel expenses** –The expenses covered by the Organisation for the transportation and accommodation for its personnel and on a case by case basis, for the business partners, invited by Electrica, if the business trips are made in Electrica’s interest.

**Promotional material** - Any object having symbolic value, which carries the visual identity, name, optionally, contact details of the organisation and information on the products and services it provides. Promotional materials are awarded to business partners, customers or stakeholders within or occasioning events or business meetings. Promotional materials are considered to be, but are not limited to: bags, calendars, clocks, pens, memory sticks, etc. having a gross value of the equivalent in RON of 50 euro.

**Business partners** – all the persons and legal entities the Organisation maintains, initiates or intends to initiate a business relationship with, including institutions or state authorities whose decisions can influence the Organisation’s operations.

**Public sector personnel** – (i) public servant means: any person who holds an legislative, executive, administrative or legal office in a country, whether appointed or elected, permanently or temporarily, paid or unpaid, regardless of its seniority; (ii) any other person who performs public office including in a public body or a public enterprise or who offers public services, as it is defined in the legislation or as it is applied in the state’s special legislation; (iii) any other person defined as a “public servant” in the legislation of the state. Besides the officials from the national public sector, there are the foreign officials, defined by any person who holds a legislative, executive, administrative office or legal person in a foreign country, whether appointed or elected, and any person performing a public function for a foreign country, whether it is a public body or enterprise. Finally, the officials of public international Organisations like international officials or any other person authorised by an international Organisation to act on its behalf<sup>1</sup>.

## The principles of the policy

### 1. Gifts and facilitation payments

In applying the provisions of the Code of Ethics and Professional Conduct regarding gifts, protocol expenses and avoiding facilitation payments, the Organisation and its personnel will monitor and avoid the following situations likely to violate the principles and rules of the Code.

#### 1.1. Situations to be avoided

- 1.1.1. The direct or indirect request, made by Electrica’s personnel of gifts, meals, paid business trips, services, favors or any other advantages from a natural or legal person - business partner, client or stakeholder for spouse, relatives and affiliated persons up to the fourth degree, with the aim of influencing decisions in any form or to create the expectation that the person who awards the gift will receive a preferential treatment.
- 1.1.2. The acceptance of gifts, whose gross value exceeds the equivalent in RON of 50 euro, awarded volutarly and spontaneously by a person or legal entity - business partner, client or stakeholder.
- 1.1.3. Awarding gifts whose gross value exceeds the equivalent in RON of 50 euro.

<sup>1</sup> UN General Assembly, *United Nations Convention Against Corruption*, October 31 2003, A/58/422, <http://www.refworld.org/docid/4374b9524.html> [accessed 18 August 2015].

Electrica S.A.	<b>Policy regarding gifts, protocol expenses and prohibition of facilitation payments</b>	<b>Cod: ESC-P-3</b>
	<b>Ensuring compliance with the principles of granting and receiving gifts, protocol expenses and prohibition of facilitation payments within the Electrica Group</b>	<b>Ed. 1, Act. 1</b>
		<b>Page: 6/11</b>

1.1.4. Accepting or awarding gifts to/from the same natural or legal person - business partner, client or stakeholder, whose aggregate gross amount in a working year exceed the equivalent in RON of 100 euro.

**1.2. Situations strictly forbidden**

1.2.1. Awarding gifts of any kind to public sector personnel, with the exception of promotional materials whose gross amount does not exceed the equivalent in RON of 50 euro.

1.2.2. Accepting or awarding of gifts, which by their nature, value and circumstances stir up suspicions regarding a potential influence on a business decision.

1.2.3. Accepting or giving monetary gifts from/to a natural or legal person - business partner, client or stakeholder the Organisation is undertaking or intends to undertake any type of relation with.

1.2.4. Acceptance by Electrica's personnel of gifts for suppose, relatives and affiliated persons up to the fourth degree, awarded by natural or legal persons - business partner, client or stakeholders the Organisation is undertaking or intends to undertake relations of any kind with, sent to the partner organisation'/organisations' mail addresses.

1.2.5. Accepting or awarding gifts received or sent to/from the home address and not to/from the partner organisation'/organisations' address.

1.2.6. Asking or accepting facilitation payments

1.2.7. Using the responsibilities within the position held in the Organisation for other purposes than those strictly professional.

1.2.8. Financing, support through service/benefits or providing, directly or indirectly, logistics to political parties/entities, politicians, parliamentary or governmental institutions or any representative of public sector personnel.

**1.3. Exceptions**

Since the awarding and accepting gifts can be a "culturally accepted" commercial practice, to avoid situations where refusal of such practices may constitute an offense to one of the parties, the following exceptions are accepted:

1.3.1. Awarding gifts at special events (holidays, major celebratory events), as long as they do not cumulatively contravene the provisions of 1.2.; gifts that fall under this section shall be granted only after prior analysis of the ethics and compliance department/officer who identifies and removes potential reputational risks derived from the action.

1.3.2. Accepting gifts whose gross value exceeds the equivalent in RON of 50 euro, if the nature, amount and circumstances do not awake suspicions regarding the potential influence on a business decision, under the condition of declaring, registering and going to the property of the Organisation, according to art. 12.2 of the Code of Ethics and Professional Conduct.

1.3.3. Accepting or awarding gifts to/from the same natural or legal person - business partner, client or stakeholder - whose gross value in a calendar year does not exceed the equivalent in RON of 100 euro, whether the nature, amount and circumstances do not stir up suspicions regarding a potential influence on a business decision, under the condition of declaring, registering and going to the property of the Organisation of those whose gross value per unit exceeds the equivalent in RON of 50 euro, according to art. 12.2 of the Code of Ethics and Professional Conduct.

1.3.4. The rule of declaring and passing to the property of the Organisation of gifts whose gross value wether exceeds the equivalent in RON of 50 euro per gift or whose gross total value exceeds the equivalent in RON of 100 euro per calendar year, regardless of the gross value per unit of each gift, is applicable in all situations, including those when the Organisation itself awards gifts to its

Electrica S.A.	<b>Policy regarding gifts, protocol expenses and prohibition of facilitation payments</b>	<b>Cod: ESC-P-3</b>
	<b>Ensuring compliance with the principles of granting and receiving gifts, protocol expenses and prohibition of facilitation payments within the Electrica Group</b>	<b>Ed. 1, Act. 1</b>
		<b>Page: 7/11</b>

personnel, other interpretation leading to the breach of the principle of non-discrimination.

## **2. Travel and protocol expenses**

### **2.1. General provisions**

- 2.1.1. Travel expenses necessary for the participation of Electrica's personnel to conferences, symposiums, congresses, seminars, workshops, any other official events, business meetings, negotiations are supported by Electrica, to the extent that these events refer to the activities and interests of the Organisation.
- 2.1.2. Electrica's personnel can also participate in events specified at point 2.1.1. if the related expenses are covered by business partners or stakeholders, under the condition that these are related to the activities or interests of the Organisation and the participation of Electrica's personnel has the endorsement of the hierarchical superior and the ethics and compliance department/ officer and the approval of the General Manager/CEO.
- 2.1.3. The participation of Electrica's personnel in events specified at point 2.1.1., which have a personal benefit (business meals, hospitality and entertainment invitations, etc.), of which expenses are covered by business partners or stakeholders, is possible only if the following conditions are met cumulatively:
  - 2.1.3.1. There is a relation to the activity or the interests of the Organisation;
  - 2.1.3.2. The nature and moment of the event does not create suspicions regarding a potential influence on a business decision;
  - 2.1.3.3. The intention of participating to the event was expressed through a memorandum submitted to hierarchical superior and the ethics and compliance department/ officer for endorsement;
  - 2.1.3.4. The memorandum endorsed by the hierarchical superior and the ethics and compliance department/officer was approved by the General Manager/CEO;
  - 2.1.3.5. The value of the invitations/services/benefits does not exceed, in a calendar year, a gross value equivalent in RON to the amount of 200 euro for invitations received from a single business partner/stakeholder.
- 2.1.4. The participation of Electrica's personnel together with a member of the family in events specified at point 2.1.1., of which expenses are covered by business partners or stakeholders, is permitted only in exceptional cases, when the nature of the event requires it or the unaccompanied participation represents a cultural offence in a business practice and only after the following conditions are met cumulatively:
  - 2.1.4.1. The accompanied participation is declared to the ethics and compliance department/ officer in a document attached to memorandum, in which the nature of the event and the reason for which the accompanied participation is necessary are presented;
  - 2.1.4.2. The memorandum and the annex endorsed by hierarchical superior and the ethics and compliance department/officer are approved by the General Manager/CEO;
  - 2.1.4.3. The value of the invitations/services/benefits does not exceed, for both persons, in a calendar year, a gross value equivalent in RON to the amount of 200 euro, for invitations received from a single business partner/stakeholder.
- 2.1.5. For official events held by Electrica or in partnership with Electrica, in the interest of the Organisation, for which the protocol expenses for business partners or stakeholders are covered by Electrica, the Organisation provides a budget that is

Electrica S.A.	<b>Policy regarding gifts, protocol expenses and prohibition of facilitation payments</b>	<b>Cod: ESC-P-3</b>
	<b>Ensuring compliance with the principles of granting and receiving gifts, protocol expenses and prohibition of facilitation payments within the Electrica Group</b>	<b>Ed. 1, Act. 1</b>
		<b>Page: 8/11</b>

- reasonable and proportionated to the nature of the event for the protocol goods and services/promotional materials distributed at the respective event.
- 2.1.6. Electrica will allocate and reimburse protocol expenses for representatives of the business partners or stakeholders invited at an event held by or in partnership with the Organisation, within the limits of the gross value of the equivalent in RON of 200 euro per event, for each participant and only if:
- 2.1.6.1. The nature and moment of the event does not raise suspicions with regard to the potential influence on a business decision;
- 2.1.6.2. The Organisation has a specific interest for which to reimburse the protocol expenses;
- 2.1.6.3. The event is not an individual meeting, but a collective one, in which representatives of more business partners or stakeholders participate;
- 2.1.6.4. The opinion of the ethics and compliance department/officer and the approval of the General Manager/CEO have been obtained for the report/memorandum submitted in this regard.
- 2.1.7. It is allowed to invite personnel from the public sector to official events, business meetings, negotiations, business meals, conferences, seminars, etc. initiated by or in partnership with the Organisation, as long as these are related to the activity or interests of the company and the protocol expenses do not exceed the equivalent in RON of 50 euro, per person, per event. Exceeding this amount is accepted only after obtaining the opinion of the ethics and compliance department/officer and the approval of the General Manager/CEO, based on a memorandum that includes the reason for which the allocation of a larger amount is necessary, but the final gross value cannot exceed the equivalent in RON of 200 euro, per guest, per event;
- 2.1.8. Electrica will provide and reimburse the protocol expenses for the public sector personnel invited to an event initiated by the Organisation or held in partnership with the Organisation, only if the following conditions are met cumulatively:
- 2.1.8.1. The invited representative of the public institution/authority does not have control attributions with regard to the activity of Electrica by the date of the event;
- 2.1.8.2. The approval of the institution/authority represented by the guest exists;
- 2.1.8.3. The opinion from the ethics and compliance department/officer and the approval of the General Manager/CEO have been obtained for the report/memorandum submitted in this regard;
- 2.1.8.4. The total amount of the expenses does not exceed the gross value equivalent in RON to 200 euro, per guest, per event and is endorsed by the ethics and compliance department/officer, taking into account the nature of the event, the position and status of the guests.
- 2.1.9. The invitation of public sector personnel to other events that also have a personal benefit (business lunches, invitations to official events and entertainment events, etc.) is allowed only if the public sector personnel has representation role and only under the following conditions:
- 2.1.9.1. The approval of the institution/authority represented by the respective guest exists;
- 2.1.9.2. The opinion of the ethics and compliance department/officer and the approval of the General Manager/CEO have been obtained for the report/memorandum submitted in this regard;

## **Rules of enforcement**

Electrica S.A.	<b>Policy regarding gifts, protocol expenses and prohibition of facilitation payments</b>	<b>Cod: ESC-P-3</b>
	<b>Ensuring compliance with the principles of granting and receiving gifts, protocol expenses and prohibition of facilitation payments within the Electrica Group</b>	<b>Ed. 1, Act. 1</b>
		<b>Page: 9/11</b>

### **3. Rules of enforcement regarding gifts receival**

- 3.1. Electrica's personnel has the obligation to declare in maximum 10 working days, to the ethics and compliance department/officer, any gift that is received while performing their duties.
- 3.2. The received gifts will be declared in a report filled in/elaborated by the employee and submitted to the ethics and compliance department/officer.
- 3.3. The report shall include: the name and position of the person receiving the gift, the department they belong to, the name of the organisation/person who awarded the gift, the description/content of the gift, the reason for receiving it, and the date of receival.
- 3.4. To identify the gross value of the gift, it shall proceed as follows:
  - 3.4.1. the commercial value of the gift is identified based on a description provided by the one who received the gift, using online search engines
  - 3.4.2. it has to be considered the average between the lowest and highest value of the gift identified online after removing VAT
  - 3.4.3. the value obtained is compared to the equivalent in RON of 50 euro at the exchange rate of RNB at the date of the receival.
- 3.5. The received gifts whose gross value exceeds the equivalent in RON of 50 euro will be registred in a special register managed by the ethics and compliance department/officer, and they will be transferred to the property of the Organisation.
- 3.6. The register will contain the following information: the name and position of the person receiving the gift, the department they belong to, the name of organisation/person who awarded the gift, the description/ content of the gift, the reason for receiving and awarding it, the gross value of the gift, and the date of receival.
- 3.7. The Ethics and compliance department/officer analyses the nature and the value of the gift, and the circumstances of its receival in order to determine whether it can be a condition or an act of influencing personnel's decisions.
- 3.8. Gifts whose gross value does not exceed the equivalent in RON of 50 euro will remain available to those who received them
- 3.9. If the ethics and compliance department/officer rejects the report on a received gift, it will be returned to the person/organisation who awarded it; the return will be accompanied by a letter describing the gift and the reason for not accepting it.
- 3.10. The ethics and compliance department/officer produces an annual risk analysis regarding the acceptance of gifts, and communicates it to Electrica's personnel using the internal communication means.
- 3.11. The ethics and compliance department/officer will prepare a separate annual report or a section included in the annual report on the gifts received during a calendar year and the way the gifts transferred to the Organisation's property have been used, but not later than the latest publication annual Activity Report of the Organisation.

### **4. Rules of enforcement regarding offering gifts**

- 4.1. The ethics and compliance department/officer will validate the documentation of the procurement of promotional materials and goods or services intended as a gift, and a representative of the department will be part of the bidding review committee.
- 4.2. Electrica's personnel is obliged to inform the ethics and compliance department/officer, at least 5 working days in advance on its intention to award any gift to natural or legal persons - business partner, client or stakeholder, during the performance of their duties and to declare and motivate the intention of awarding gifts whose gross value exceeds the equivalent in RON of 50 euro.

Electrica S.A.	<b>Policy regarding gifts, protocol expenses and prohibition of facilitation payments</b>	<b>Cod: ESC-P-3</b>
	<b>Ensuring compliance with the principles of granting and receiving gifts, protocol expenses and prohibition of facilitation payments within the Electrica Group</b>	<b>Ed. 1, Act. 1</b>
		<b>Page: 10/11</b>

- 4.3. The memorandum will consist of: the reason for awarding the gift, gift description, gross value of the gift, name of the organisation/person who will receive the gift, date of the awarding.
- 4.4. To identify the gross value of the gift, if it is not communicated or needs to be checked, it shall proceed as follows:
  - 4.4.1. the commercial value of the gift is identified based on a description provided, using online search engines
  - 4.4.2. it has to be considered the average between the lowest and highest value of the gift, identified online after removing VAT
  - 4.4.3. the value obtained is compared to the equivalent in RON of 50 euro at the exchange rate of RNB at the date of the assessment of the gift ment for awarding.
- 4.5. The awarded gifts will be registred into a dedicated register managed by the ethics and compliance department/ officer.
- 4.6. The register will contain the following information: the description/content of the gift, the reason for awarding it; the gross value of the gift; the name of organisation/ person who receives the gift, and the date of award.
- 4.7. The ethics and compliance department/officer is obliged to analyse the situations when awarding or intention of awarding a gift might pose a risk to the Organisation, and to make recommendations in this regard which will be forwarded where appropriate to the department which proposed the award, risk management department, and to the management.
- 4.8. The expenditure to purchase promotional materials and gifts for events will be included in a report which will require the opinion of the ethics and compliance department/ officer before the General Manager's approval.
- 4.9. The ethics and compliance department/ officer will elaborate annually a separate report or a section included in the annual report on the situation of awarded gifts during a calendar year, but no later than the latest publication annual Activity Report of the Organisation.

## **5. Rules of enforcement Travel and protocol expenses**

- 5.1. The invitations, regardless of the nature of the event and the person to whom it is addressed, are always sent to the address of the organisation, institution/public authority of the guests, not on their personal address.
- 5.2. The reimbursement of travel expenses related to the participation of Electrica's personnel to conferences, symposiums, congresses, negotiations, business meals, which are related to the activity or interests of the Organisation and in which the personnel represents the Organisation are reimbursed according to the procedures in force.
- 5.3. The reimbursement of travel expenses for guests to an event initiated by or held in partnership with the Organisation, regardless of the nature of the institution that they are from, will be done based on a memorandum, specifying: the name of the guest and organisation they represent, the name of the event, the date of the event, the amount allocated for travel expenses for the guest, the reason for the allocation or reimbursement of travel expenses, other relevant information, according to the above provisions.
- 5.4. Before validating the reimbursement of these expenses, the ethics and compliance department/officer analyses the presented situation, from the perspective of identifying unethical, illegal or inadequate situations, with the purpose of preventing them.
- 5.5. To the extent that Electrica's personnel participates in events, which also have personal benefit or to which Electrica's personnel, for protocol considerations, needs

Electrica S.A.	<b>Policy regarding gifts, protocol expenses and prohibition of facilitation payments</b>	<b>Cod: ESC-P-3</b>
	<b>Ensuring compliance with the principles of granting and receiving gifts, protocol expenses and prohibition of facilitation payments within the Electrica Group</b>	<b>Ed. 1, Act. 1</b>
		<b>Page: 11/11</b>

to be accompanied and for which the integral expenses are covered by the Organisation, their reimbursement will be made after obtaining the endorsement of the ethics and compliance department/officer that must verify whether the reimbursement of these expenses is subject to point 1.3.

- 5.6. To the extent that the expenses for the participation of Electrica's personnel to events are covered by third parties, regardless these are subject to the provisions of points 2.1.2, 2.1.3, 2.1.4 from the above section "Travel and protocol expenses", the approval of the participation is made directly by the General Manager/CEO, based on a memorandum submitted by the participant, endorsed by the hierarchical superior and the ethics and compliance department/officer, according to the policy in force.
- 5.7. The memorandum will contain: the name and position of the participating person, the type and date of the event, the context, the estimated value and type of expenses of which the participant will benefit, the name of the organization/person covering the expenses.
- 5.8. The participation of Electrica's personnel in accepted events will be registered in a public register, specifically managed by the ethics and compliance department/officer, that will contain the following information: the name and position of the participating person, the type and date of the event, the context, the estimated value and type of expenses of which the participant will benefit, the name of the organization / person covering the expenses.
- 5.9. Every two years, the ethics and compliance department/officer makes an analysis of the risks regarding the acceptance and offering of invitations to events, regardless of who covers the costs, and communicates this to Electrica's personnel through the internal channels of communication.
- 5.10. The ethics and compliance department/officer will make a separate annual report or a section included in the annual report regarding the travel and protocol expenses covered by the Organisation and those covered by the business partners/stakeholders, as well as the sending and accepting of invitations in the course of a calendar year.

## Reporting of Non-compliance

Electrica adopts and implements a policy regarding Whistleblowing, based on principles outlined in the Code of Ethics and Professional Conduct. Any employee, customer, supplier, contractor and sub-contractor of the Organisation who is related to its operations, may lodge under conditions that ensure the confidentiality of his identity, notifications or complaints on any action of an employee or a person acting on behalf of the Organisation that would violate the law or internal rules on business ethics and conduct of the Organisation, including the provisions of this policy.

The notification of any breach from this policy may be submitted according to the whistleblowing procedure, at <http://www.electrica.ro/procedura-de-raportare-a-abaterilor-etice/>.