

Approved
by Decision of the Executive Board
of the National Bank of Moldova
No 257 from 6 November 2025

REGULATION
on the record keeping of cases of undue influence
within the National Bank of Moldova

Document Attributes

Document attributes	Value attributes
The author	Compliance Division
The beneficiary	Employees of the NBM, members of the Executive Board, members of the Supervisory Board
Subject of the document	Establishing the procedure for communication and record keeping of undue influence exerted on NBM employees
Regulated process(es)	724. Compliance management
Higher category act	Law No 325/2013 on the assessment of institutional integrity Integrity Law No 82/2017 Government Decision No 767/2014 for the implementation of the Law No 325/2013 on the evaluation of institutional integrity
Process owner	Compliance Division

Revision history

Version	Date	Description	Approved
1	2025	Initial version	DEB No 257 of 06.11.2025

I. GENERAL PROVISIONS

1. The Regulation on the record keeping of cases of undue influence within the National Bank of Moldova (hereinafter - *Regulation*) is drafted in accordance with the provisions of the legislation in force and establishes the procedure for communication and registration of cases of undue influence exerted on public agents within the National Bank of Moldova (hereinafter – *NBM*), as well as the method of managing the *Registry for record keeping of cases of undue influence* (also called *Registry*).
2. The purpose of this Regulation is:
 - 1) the increase of responsibility for the development, maintenance and strengthening of the professional integrity climate within the NBM;
 - 2) ensuring the professional integrity of the public agents within NBM, the prevention and combating of corruption within the NBM;
 - 3) the development of the organisational culture regarding the reporting of acts of corruption.
3. The Regulation shall apply to public agents within the NBM, including members of the Executive Board and members of the Supervisory Board in the process of identifying and reporting undue influence.
4. The terms not defined in this Regulation shall have the meanings provided in Law No 325/2013 on the assessment of institutional integrity (hereinafter - *Law No 325/2013*), the Integrity Law No 82/2017, and Government Decision No 767/2014 for the implementation of the Law No 325/2013 on the assessment of institutional integrity.
5. For the purposes of this Regulation, the following terms shall mean:

public agent – NBM employees, subjects of the legal regime on declaration of assets and personal interests, and the members of the governing bodies of the NBM;

denunciation – a written notification made by the public agent upon whom the undue influence is exerted, containing the information provided by point 14;

undue influence – interference in the professional activity of the public agent by third parties, manifested through pressure, threats, or requests, aimed at determining the agent to carry out their professional activity in a certain way, when such interference is illegal and is not accompanied by the promise, offering or giving, either personally or through an intermediary, of goods, services, privileges, or advantages in any form, which are not due to them (does not meet the elements of a criminal offence).
6. The responsible person within the Compliance Division for registering cases of reported undue influence and ensuring their confidentiality under the conditions of this Regulation, as well as for keeping the *Registry* is appointed by the Governor's order (hereinafter – *the designated person*).

II. PROCEDURE FOR REPORTING THE UNDUE INFLUENCE

7. The public agent subject to undue influence shall be obliged:
 - 1) to expressly reject the undue influence;
 - 2) to carry out legally the activity for which the undue influence occurred;
 - 3) in case of impossibility to expressly reject the undue influence and if their professional activity is affected, the public agent shall be obliged to submit a written denunciation regarding the exertion of undue influence, according to points 11 or 12;
 - 4) to submit a denunciation about the exertion of undue influence to the National Anti-Corruption Centre (hereinafter – *NAC*), if the source of the undue influence is the Governor or if, after submitting a denunciation as per subpoint 3), the Governor does not fulfil the

obligations provided in Article 17 paragraph (2) letter d) and e) of the Integrity Law No 82/2017, by one of the methods set out in point 15.

8. The public agent within the NBM, amenable by undue influence may secure themselves with witnesses, including colleagues from their workplace or, as appropriate, with other evidence.
9. The Governor of the NBM shall be obliged:
 - 1) to undertake the necessary measures for implementing internal acts establishing the rules for organising activities of reporting and addressing the undue influence, by the public agents;
 - 2) to ensure the record of the cases of undue influence exerted on public agents, in the Registry of reports, by appointing the responsible person;
 - 3) to ensure the possibility of confidential reporting of cases of undue influence, by ordering the establishment of secure reporting channels;
 - 4) to ensure the necessary conditions for the lawful conduct of activity by the public agents and to verify the fulfilment of the duties for which the undue influence has occurred, through the responsible subdivisions;
 - 5) to undertake measures to prevent cases of undue influence by direct involvement in their resolution (*for example, warning through the issuance of official notifications, discouraging the person performing undue influence, including by warning their hierarchically superior head, identifying other legal measures*);
 - 6) to hold disciplinarily liable the public agents who carry out their professional activity without rejecting the undue influence to which they are amenable or without reporting the undue influence they cannot reject on their own;
 - 7) to ensure access to the Registry and/or to scanned copies from the said Registry, for the institution conducting the professional integrity testing regarding public agents within the NBM, including by sharing their electronic version.
10. If the designated person refuses to register the denunciation under the conditions provided by this Regulation, the public agent shall address directly to the Governor or, if applicable, to NAC.
11. The communication of the undue influence shall be made without delay, but no later than within 3 working days. The public agent must submit a written denunciation to the Governor, according to the form provided in Annex 3, through the electronic document management system (EDMS), the "Compliance Division" section.
12. In case of lack of access to the EDMS, the denunciation shall be submitted through the designated person, with the addition of a statement certifying this fact.
13. The 3-day term starts from the day the undue influence is exerted. If the public agent is objectively unable to submit the denunciation within the above-mentioned term, it shall be submitted on the day immediately following the cessation of the respective reasons, attaching evidence confirming them. It shall not be considered an objective reason for inability to submit the denunciation within the term set out above if the public agent is performing their duties at the workplace during the running of this term.
14. The following details shall be mandatory to be mentioned in the denunciation by the public agent amenable by undue influence:
 - 1) their full name, position, and the subdivision in which they performs the functional duties;
 - 2) the identification data of the person who attempted to influence them (if known);
 - 3) description of the undue influence, the date and time when it occurred;

- 4) the identification data of the persons who have information regarding the circumstances in which the undue influence took place (if such persons exist and if the mentioned data are known).
15. The Governor, members of the Executive Board and members of the Supervisory Board shall report the improper influence exerted on them to NAC, by one of the following means:
 - 1) a written denunciation sent to NAC, including via the email indicated on the website of NAC;
 - 2) by filling in the online form for reporting the undue influence on the website of NAC, directly or through the national anti-corruption hotline operator within NAC.
16. The public agent shall be provided with the possibility to report in accordance with the provisions of this Regulation under conditions of confidentiality, except for the cases when the option of disclosure of the reported matters is chosen (in the media, to other institutions, persons, including those concerned in the report).
17. The designated person shall be obliged to maintain confidentiality by signing the declaration according to Annex 4.
18. If the report contains information indicating the existence of the elements of a crime, NBM shall forward it without delay, but no later than 3 working days, to the law enforcement bodies, according to their competences established by the Code of Criminal Procedure.

III. MANAGEMENT OF THE REGISTRY OF UNDUE INFLUENCE CASES

19. The reporting of the undue influence shall be recorded by the designated person in the Registry kept on paper and in electronic format, according to Annex 1, on which the note „*Information with limited accessibility*” shall be applied.
20. After receiving the denunciation about the undue influence, the designated person shall apply the note „*Information with limited accessibility*” to it and forwards it to the Governor no later than the next working day after it was received, with the subsequent application of the marking provided by the internal regulations regarding information classification. The public agent who submitted the denunciation shall receive a stub confirming the proof of submission of the complaint.
21. Access to the registries of records on cases of undue influence shall be granted to: the designated person, the Governor and persons within the institutions conducting professional integrity testing, authorised for this purpose. Access of other persons to the Registry shall be strictly prohibited.
22. The designated person shall keep the track of all cases of exercising the right to access the information recorded in the Registry, including the justifications that substantiate the exercise of this right, through an access log in the form provided in Annex 2, attached to the Registry.
23. The records made in the Registry and the content of the denunciations represent official information with limited accessibility, classified as confidential information about persons, within the meaning of the Law No 148/2023 on the access to information of public interest. The interested persons in obtaining the information regulated by this Regulation, under the conditions of the aforementioned law, are communicated exclusively statistical data.

IV. LIABILITY

24. The failure by the public agent to inform the Governor or, as the case may be, NAC about the attempt to be influenced, in accordance with the provisions of this Regulation,

constitutes a breach of the obligations established in art. 7 par. (2) letter c) of Law no. 325/2013, as well as a breach of the ethics and professional conduct rules of NBM.

25. The refusal to receive the denunciation by the designated person or the refusal to register the denunciation in the Registry entails disciplinary liability according to the established procedures.
26. Failure to comply with the obligation to ensure denunciation in accordance with the provisions of these Regulations under conditions of confidentiality and the confidentiality of the information received, constitutes a breach of the ethics and professional conduct rules of NBM, labour discipline and entails the application of the corresponding disciplinary sanction.
27. Personal data processing operations concerning public agents and third parties, carried out with the violation of the provisions of the legislation on personal data protection, shall entail civil, contraventional or criminal liability, as the case may be.

V. FILING. RETENTION PERIODS

28. The filing of denunciations received by the responsible person is carried out at the end of the management year.
29. After filing, the denunciations are kept for a period of 1 year, after which they are disposed of according to secretariat rules.
30. The registries of record keeping of the cases of undue influence kept on paper are archived at the end of the management year and are kept for an additional period of 1 year, after which they are disposed of, according to secretariat rules.

Annex 1
to the Regulation on the record keeping of cases
of undue influence within the National Bank of Moldova

Registry of cases of undue influence

No.	Date and time of receipt of the communication	Name, surname and position of the public agent, subdivision in which they perform their duties	Identification data of the person who attempted to exert undue influence	Description of the undue influence (date, place, other circumstances)	Evidence of the exerted undue influence (documents, witnesses, others)	Signature of the public agent	Signature of the person responsible for receiving the communication of undue influence
1.							
2.							
3.							
4.							

Annex No 2
to the Regulation on the record keeping of cases
of undue influence within the National Bank of Moldova

ACCESS LOG for the Registry of undue influence cases

No.	Date and time of receipt of the access request	The name, surname and position of the person requesting access	The grounds of the request*	The date on which access was granted or the mention regarding the refusal of access
1.				
2.				
3.				
4.				

Note: When filling in the column „*Grounds of the request*” the applicable article from Law No 325/2013 and the point from this Regulation shall be indicated.

DENUNCIATION	
Hereby, _____, holding the position of <i>(name and surname)</i>	
_____ <i>(position held, subdivision in which the employee performs the functions duties)</i>	
declare that on the date of _____ I was influenced by <i>(date and time)</i>	
_____ <i>(identification data of the person who attempted the influence, if known)</i>	
The undue influence manifested through _____ <i>(description of the undue influence)</i>	
The undue influence can be confirmed by/through _____ _____ <i>(the identification data of the person(s) who possess information regarding the circumstances in which the undue influence took place or other evidence, if any)</i>	
I have discussed/have not discussed with other persons about the undue influence on me <i>(underline)</i>	
_____ <i>(name, surname)</i>	_____ <i>(signature)</i>
_____ <i>(date)</i>	
STUB	
The denunciation is received by _____ <i>(name, surname of the person receiving the communication)</i>	
Registration number _____	
_____ <i>(date of receipt of the communication)</i>	_____ <i>(signature of the person receiving the communication)</i>

I declare that I am aware of and understand the provisions of this Regulation

Annex 4

Regulation on the record keeping of cases of undue
influence within the National Bank of Moldova**CONFIDENTIALITY AND IMPARTIALITY STATEMENT**

Hereby, the undersigned

(last name, first name)

employed at

(the title of the position and the subdivision within the NBM)

I commit to keeping the confidentiality of the information obtained as a result of performing the duties assigned under

(no. and date of the internal order)

in accordance with *the Regulation on the record keeping of cases of undue influence within the National Bank of Moldova* (approved by the DEB of the NBM No 257 of 06.11.2025 and to use it only for the purpose established by law and not to disclose this information to unauthorised persons, including after the termination of the related activities.

I declare that I am aware of the legal provisions regarding the liability that arises in case of breach of confidentiality obligations.

I commit, in the event of a conflict of interest arising, to comply with legal regime on conflicts of interests and to submit a declaration of abstention.

The obligation of non-disclosure of information remains in force even after the termination of the activity related to the record of undue influence in accordance with the legislation.

Date/Signature