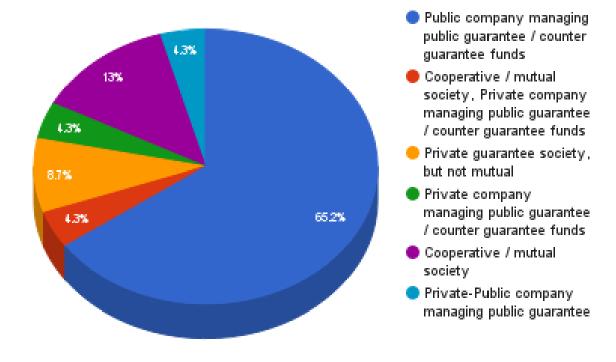


NATIONAL LOBBYING ACTIVITY SURVEY a. YOUR INSTITUTION IS:



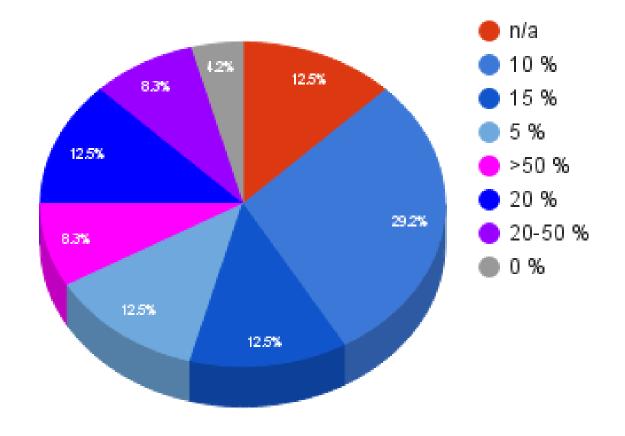


NATIONAL LOBBYING ACTIVITY SURVEYb. HOW MUCH TIME IS SPENT ON LOBBYING?

- Appr. four times per month.
- We have a PR+GR director (1 person + subcontractors)
- around 4 days per month
- 20 percent
- At management level approximately 2-3 day per month.
- 5%
- In total equal to the capacity of one person (full time job).
- 1 full person
- We don't carry out constant lobbying activity, but only occasionally, so this time is impossible to assess.
- It is hard to estimate the time
- appr. 1 day per week
- **30** %
- 8-16 hours a week
- Most of the time of INVEGA's administration
- We are doing it rearely, only paricipiating as member of similar organisations networks.
- marginal
- We are spending certain time on lobbing but it could be much more

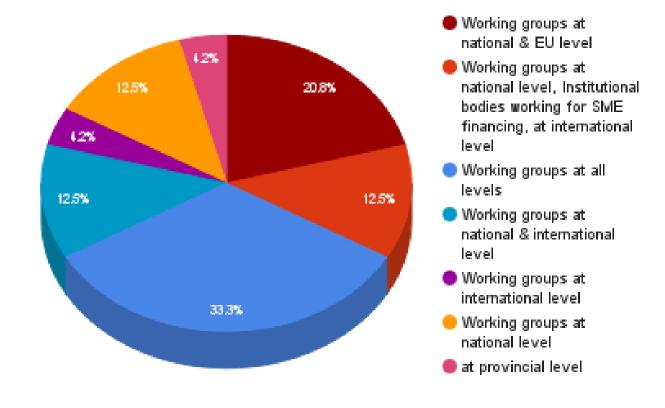


c. WHAT PROPORTION (APPROXIMATELY) OF MANAGEMENT TIME IS DEVOTED TO LOBBYING IN YOUR INSTITUTION? (IN %)



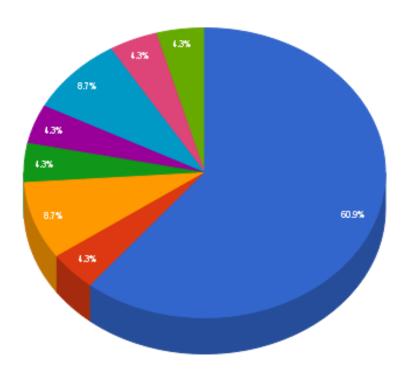


d. WAS THERE, DURING THE LAST 3 YEARS, A REPRESENTATION OF YOUR INSTITUTION BY A DELEGATE, AN ADMINISTRATOR, OR AN OBSERVATORY IN:





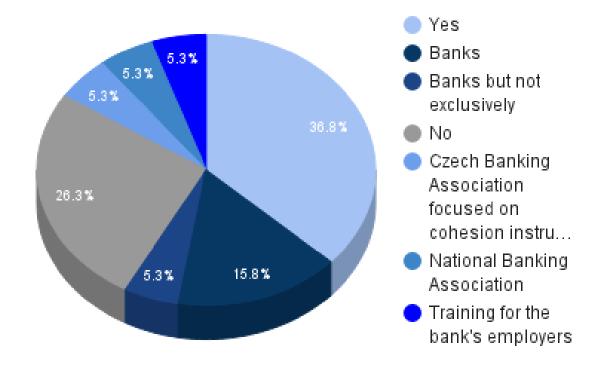
e. COORDINATION (IN ACTIONS ON REPRESENTATION, ISSUING PAPERS, SETTING CONFERENCES) WITH OTHER ACTORS SUPPORTING SMES:



- Organizations representing SMEs, Chambers of Industry and Commerce, Chambers of Skilled Crafts, National or regional development agencies
- Chambers of Agriculture
- National or regional development agencies
- Organizations representing SMEs, National or regional development agencies
- Organizations representing SMEs, Chambers of Industry and Commerce, Chambers of Skilled Crafts, (i) technical advisor and participant to consultations for governmental guarantee programmes initiated by the Ministry of Public Finance and other ministries or governmental agencies; (ii) participat...
- Chambers of Industry and Commerce, Chambers of Skilled Crafts, National or regional development agencies
- Organizations representing SMEs, Chambers of Industry and Commerce, Chambers of Skilled Crafts, Clusters (regrouping regional enterprises of the same sector or constituting a value chain), National or regional development agencies
- Organizations representing SMEs

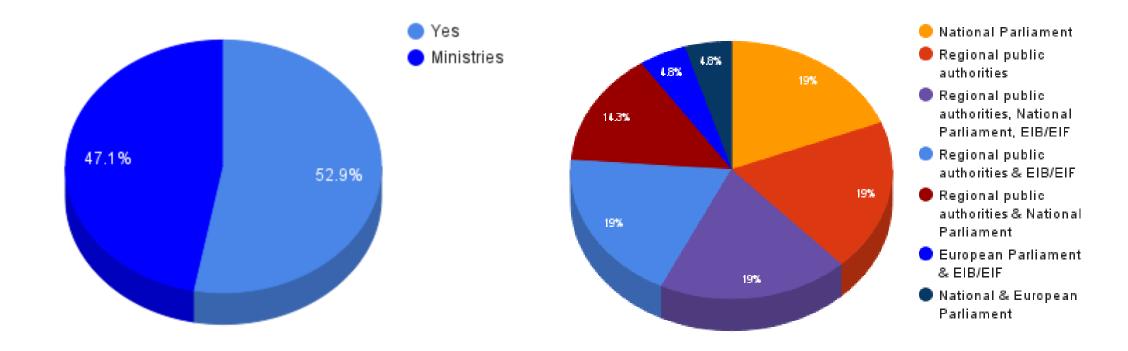


NATIONAL LOBBYING ACTIVITY SURVEYf. HOW DO YOU LOBBY IN FAVOR OF GUARANTORS?



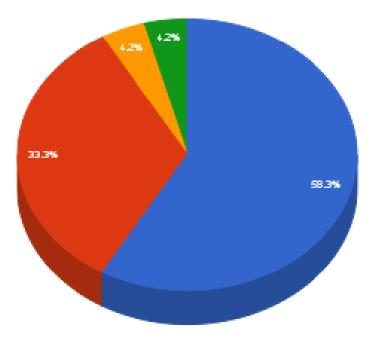


NATIONAL LOBBYING ACTIVITY SURVEY g. ARE YOU LOBBYING POLITICAL AND STRATEGIC DECISION MAKERS?





h. ARE THESE RELATIONS:



- Only exceptional, thematic or focused on some topics?
- Through regular and planned meetings?
- It is a regular activity but without a fix schedule.
- (i) regular meetings with ministries; (ii) under invitations received from the Chamber of Deputies' Economic Commission, to provide advice on subjects related to FNGCIMM's expertise

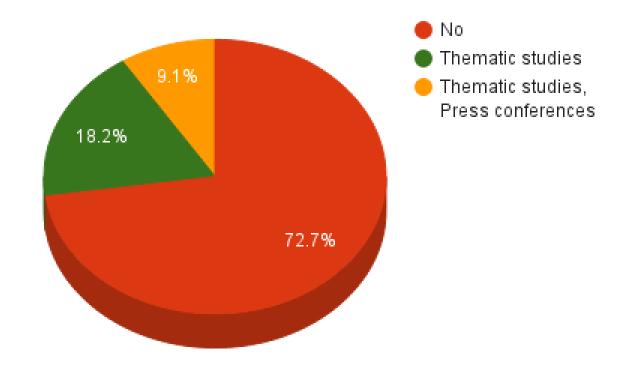


NATIONAL LOBBYING ACTIVITY SURVEY i. WHAT TOPICS HAVE YOU LOBBIED FOR? (PLEASE ADD EXPLANATORY TEXT)

- National Guarantee Systems, SME financing
- State counter-guarantee, state aid regulation, IFRS adaptation, involvement of our guarantee in national SME development support programmes
- Economic additionality of the guarantee product: through a university study, through own papers
- Regulations of access to finance, interest rates for subsidized credits, subsidized percent in government budget, credit limits and maturity.
- Funding, making changes of the terms and conditions of governmental programmes to be more favourable and less complicated.
- "Promoting more public support to guarantee activities & Promoting specific products for niche markets (self employees, entrepreneurs, ...)"
- "SMEs financing issues. Benefits of guarantees for SMEs and the Banking system. The importance of entrepreneurship for the economy and the Society. Design and implementation of new attractive financial instruments in favour of SMEs
- The introduction of special guarantee lines for strategic projects; Changes to legislation and procedures for higher quality and more operational approach to beneficiaries and principals of guarantee."
- Guarantee scheme in Poland, de Minimis, Operational Programs
- Guarantee instrument, subsidizing guarantee fee and credit interest, guarantee limit
- Special SME credit program secured by guarantee
- Guarantee scheme for greening of shipping (engine rooms) and loans for residential energy conservation programs
- 1) Combination of two financial instruments under different EU funds: loans from ESF with guarantees from ERDF;
- 2) Opportunity of using Counter guarantee fund's money, aggregated from ERDF, in case of providing coverage not only for new, but also for retroactive guarantees (already issued by INVEGA with national money);
- 3) Release of new guarantee instruments such as export guarantees, guarantees for large companies, adjustment of legislation on lease guarantees and etc."
- Last topic from our side lobbied in national leval was about our legal form, as we are state founded fund our activities are limited we are aiming for promotional bank. Hot topic on EU level which we discussed lately with EIF and Commission was about EIF compiting with our kind of organisations in small markets.
- Better acces to finance for SME's, administrative simplifications
- We are lobbying for the adoption of the Law on guarantee schemes

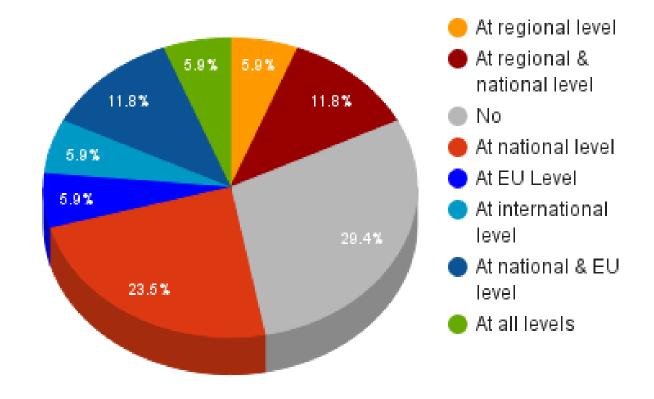


NATIONAL LOBBYING ACTIVITY SURVEY j. ARE YOU USING EXTERNAL LOBBYING AGENCIES (ON CONTRACT SERVICES)?





k. ARE YOU COORDINATING YOUR LOBBYING ACTIVITIES WITH OTHER GUARANTEE INSTITUTIONS? (OUTSIDE AECM)





NATIONAL LOBBYING ACTIVITY SURVEY I. OTHER EXAMPLES OF BEST PRACTICES OF LOBBYING THAT YOU OBSERVED IN YOUR COUNTRY:

- Nothing more than stated above.
- It is very important to avoid the excessive dependency on banks for SME financing. We should try to work on other alternative sources of funding (debt funds, crowdfunding, ...) and make sure the public administration agree with this strategy
- Some NGOs, focused on improvement in central & local administration, obtained in the last period important results in cutting red tape for small firms (e.g. Fiscal Code 2015)
- EU funded transnational projects
- I did not observe something different than we are doing
- Harmonization of PANBaltic fund, established by ALTUM, INVEGA, Kredex and EIF.
- Recourse on entrepreneurs testifying about an easier access to finance thanks to guarantee instruments



m. MORE IDEAS?

- We would be happy to receive some FAQ on lobbying. We are not an EU-country, but we have some problems with understanding of our (and SME's) needs, so any help will be very useful. All the best, Vladimir
- "Lobbying is not a recognized profession and has no legal definition in Romania. The actions described before have the meaning of "promotion" for the FNGCIMM's mission as specialist SME guarantee institution, for a specific guarantee programme, or for a range of guarantee products.
- (ii) As public corporation (state-owned company) and specialist SME credit guarantee fund, FNGCIMM has to harmonize its strategy and operation with governmental strategy, policies, and priorities regarding SME support and entrepreneurship development."
- This initiative will be proved very useful for all AECM members. The action plan, that will be prepared, will definitely help AECM for even more effective lobbying use. A very important aspect that AECM must focus while lobbying is to first outline the different needs of its members' economies. Thus, it is logical -while lobbying- to always have in mind that for instance, a Dutch or a German SME does not face the same history, environment, problems, facts and policies as an SME in Italy, Spain or Greece. The needs of AECM's members are differentiated because our economies are dissimilar. But in the process of EU integration, actions must be taken in order for the economies to come closer and in the long run to compete in respective equal terms. That is why we propose that AECM should first focus on each one of its EU members' economy/SME specific needs and then lobby with accurate "tailor made" requests in favor of its members economies' issues. "
- Nothing special

