The following pages contain the detailed scoring for your company based on public information.

The following table represents a summary of your scores:

<table>
<thead>
<tr>
<th>Topic</th>
<th>Number of questions</th>
<th>% score based on public information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leadership, Governance and Organisation</td>
<td>10</td>
<td>20%</td>
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<tr>
<td>Risk Management</td>
<td>7</td>
<td>7.1%</td>
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<tr>
<td>Company Policy and Codes</td>
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<tr>
<td>Training</td>
<td>5</td>
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<tr>
<td>Personnel and Helplines</td>
<td>7</td>
<td>35.7%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>41</strong></td>
<td><strong>31.7%</strong></td>
</tr>
</tbody>
</table>
A1:

Does the company publish a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company publishes a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company.

References:

Public:
NA
A2:
Does the company’s Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company.

References:
Public:
NA
A3:
Does the company’s Chief Executive Officer demonstrate a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company’s Chief Executive Officer demonstrates a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure.

References:
Public: NA
A4:
Does the company publish a statement of values or principles representing high standards of business conduct, including honesty, trust, transparency, openness, integrity and accountability?

Score:

2

Comments:
Based on public information, there is evidence that the company publishes a statement of principles representing high standards of ethical business conduct, including honesty, integrity, transparency, responsibility and accountability.

References:
Public:
Company website: Aselsan Ethic Principles
'Basic Principles
Honesty, integrity, work discipline,
Modesty, respect, mutual understanding, commitment,
Consistency of our actions and discourses, openness,
Cost awareness (avoidance of waste),
Meeting the customer needs in the best manner,
To work in accordance with the mission and with the goal of capturing the vision,
Adopting the spirit of belonging to the corporation and to embrace the spirit of institutionalism,
To promote creativity and different ideas, common sense and team spirit, flexible thinking and being able to act in a flexible manner against events,
To conduct the production activities in a manner that does not harm the environment by means of complying with the standards defined in this regard.
Taking measures to protect workers' health and safety are our basic principles.’

Sustainability Report (January 2014), p.5:
'Corporate governance lies at the heart of all our business operations. ASELSAN adopted Capital Market Board of Turkey’s (CMB) Corporate Governance Principles (CGP) in 2004 and started to publish CGP Compliance Report both in annual reports and on company website. The principles defining ASELSAN’s corporate governance understanding are fairness, transparency, responsibility and accountability. We employ these principles to all management operations and decisions.’

(p.7): ‘3. Ethical Principles
All our employees are conscious that our company’s and our community’s long term interests are relying upon our society’s, public’s, customer’s, shareholder’s, stakeholder’s and our supply chain’s emphasis on highest of ethical standards.
Honesty, courtesy, sincerity, tolerance and respect to every other person shape our work environment and it is our ultimate hope that this sense of responsibility is transferred to everybody we get in touch with.
Complying with the values and ethical principles is of utmost importance for a member of our family at ASELSAN, be it the Board of Directors or top management team or our employees. In order to disseminate ethical values of ASELSAN to its employees and to future generations, ASELSAN produced “Ethical Principles and Rules of Conduct” document in 2007.
The main objective of this document is to lead and to educate the members of ASELSAN family, including the stakeholders and the supply chain, about the values and the ethical principles and to encourage the practice of ethical behaviors within our corporation and our ecosystem.
The “Ethical Principles and Rules of Conduct” document with its appendices is communicated to all ASELSAN employees. Their knowledge about and commitment to these values and principles is signed under a notification.
During the orientation program, designed by The Training Department, Ethical Principles and Rules of Conduct are communicated to all new employees. These new employees receive special training about these principles and rules if suggested by the Ethical Principles Committee.’

Preventing conflict of interests, managing the relationship with all our stakeholders with extreme professionalism and objectivity as well as complying with all legal obligations are in the heart of our values. Bribery and corruption are strong threats to the well being of our community, therefore we define and explain rules of conduct with our customers in our directives and terms and condition of purchasing on our website. We emphasize the importance of customer satisfaction, and responsibility to achieve the best possible quality in every single thing we do and we are sensitive towards the well being of society, environment and the human rights.’

Annual Report (2013), p.18:
‘The principles defining ASELSAN’s understanding of corporate governance are fairness, transparency, responsibility and accountability. The company employs these principles in all of its management operations and decisions.’

(p.86): ‘Within the scope of corporate governance, ASELSAN prepared the Ethical Principles and Rules of Conduct Document in order to integrate its joint values and ethical principles into its practices, to create a working environment that complies with the company’s ethical principles, to prevent non-ethical behavior and to raise awareness on this issue. In line with our ethical principles, we aim to prevent any potential conflicts of interest, arrange ASELSAN’s relations with its stakeholders in a neutral manner and from a professional point of view and to ensure that our company fully complies with the rules of all related legislations.

ASELSAN’s Ethical Principles, which we have shaped based on such pillars as honesty, integrity and business discipline, create a working environment where all our employees show respect, kindness, sincerity and mutual tolerance to each other and exchange their ideas on an open platform.

All ASELSAN employees are aware of their responsibility to protect our company’s long-term interests while meeting the requirements of our society, the general public, our customers, our employees, shareholders and stakeholders, and our supply chain; to report and prevent unethical behavior and; and to create a working environment marked by accountability and integrity.’

A5:

Does the company belong to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company belongs to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption.

References:

Public:
NA
A6: Has the company appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda?

Score: 1

Comments: Based on public information, there is some evidence that the company’s Audit Committee has some corporate responsibility for its ethics and anti-corruption agenda, working with the Internal Audit department and Ethical Committee. However, specific roles and responsibilities are not made explicitly clear. The company therefore scores 1.

References:

Public:
Sustainability Report (January 2014), p.6:
‘Audit Committee: The committee is comprised of three independent Board members. Its main duties are enabling the disclosure of the financial data, pursuing the operation and efficiency of the accounting system, independent audit, internal audit and internal control system of ASELSAN. Internal Audit and Assessment Department reports directly to Audit Committee and Board of Directors. The committee assembles at least four times a year. Corporate Governance Committee: The committee is comprised of six Board members and headed by an independent Board member. It presents suggestions to the Board of Directors regarding compliance with and improvements upon Corporate Governance Principles. The committee also oversees the activities of Investor Relations and Affiliates Department. The committee assembles at least four times a year.’

(pp.8-9): ‘4. Internal Audit
In ASELSAN, internal audit activity evaluates and improves the effectiveness of corporate governance, risk management and internal control processes. The key role of the internal audit activity is to provide assurance to the Audit Committee and Board of Directors that risks are managed effectively. Annual audit plans and engagement programs are risk-based and audit results are periodically reported to the Audit Committee. Internal audit department assesses compliance with laws and regulations, applying and upholding the
code of ethics, and the adequacy of controls intended to eliminate related risks.’

Annual Report (2013), p.105:
‘It is resolved that the actions to be taken with regard to the article of Corporate Governance Principles “The company builds the necessary mechanisms through which the stakeholders may inform the corporate governance committee or audit committee about the transactions of the company which are in contradiction with the related regulation and are ethically inappropriate.” shall be coordinated by the Audit Committee and the studies regarding this issue are carried on.’
A7:
Has the company appointed a person at a senior level within the company to have responsibility for implementing the company’s ethics and anti-corruption agenda, and who has a direct reporting line to the Board?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has appointed a person at a senior level within the company to have responsibility for implementing the company’s ethics and anti-corruption agenda. However, TI does note the role of the Ethical principles Committee.

References:

Public:
TI notes:
Sustainability Report (January 2014), p.8:
‘Ethical Principles Committee (EPC) is made up of nine members and the secretariat is undertaken by the Human Resources Manager. The rest of the members are comprised of representatives from the Divisions, the Department of Legal Affairs and the Department of Procurement with the consent of the CEO. The members of the committee do not change frequently unless an organizational change occurs; they tend to serve for at least five years on the run.

EPC gathers at least once every four months and/or whenever there is an inquiry or breach. The CEO or one of the members of the committee can also request a meeting. Apart from immediate intervention to inquiries and breaches, the EPC act as the sense and the conscience of ASELSAN by remedying ethical problems as well as raising consciousness towards ethical principles within ASELSAN.

When there is an inquiry, the application is immediately reported to the EPC with the necessary background information and relevant documentation. Head of the committee with all the information gathered and the documentation reported informs the CEO and further investigation is carried out. At the end of the investigations, according to the laws and/or related ASELSAN directives, necessary precautions are taken. These inquiries and the actions to remedy those breaches are periodically reported at the Board Meetings.’
Annual Report (2013), p.106:

‘14. Ethical Rules and Social Responsibility

The ethical rules of our Company have been written and were published on our website. Furthermore, in order to integrate and develop the ethical rules with the implementations, an Ethical Committee was established to meet the evaluation, direction, consulting and recommendation requirements and create shared knowledge.

“Ethical Principles and Behavior Rules” document is announced to all ASELSAN personnel with all its exhibits and the personnel makes a written commitment that s/he acknowledges the information and ethical values. When an amendment or an update is made on this document, the changes are made known to all the personnel and training programs about these changes are organized if seen necessary.

Ethical Committee comprises of nine members and the secretariat is handled by Human Resources Manager. Other members are the representatives indicated by divisions; the Law Department and Procurement Department charged by the CEO. If there are no changes in the organization, the Ethical Committee members serve at least for five years.

Ethical Committee meets 4 times a year unless an application or disobedience is present. CEO or any member of the committee can call a meeting. Beyond intervening in applications and disobedience, Ethical Committee represents reason and conscience of ASELSAN and works to increase the awareness in ASELSAN family. When there is an application, required research conclusions and necessary documents are forwarded to Ethical Committee. Committee Chairman presents these to the CEO and a parallel investigation is carried out. At the end of this investigation, necessary steps are taken in accordance with relative law and ASELSAN regulations. The applications and disobedience is reported periodically in Board of Directors meeting.

Audit Committee is responsible for establishing the mechanism where the complaints regarding the unethical behaviors and acts against the regulations are evaluated, concluded and operated confidentially. The Committee is expected to complete its studies on this matter during 2014.’
A8:
Is there regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda?

Score:

0

Comments:
Based on public information, there is no readily available evidence that there is regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda. TI notes that the Internal Audit department assesses compliance with the code of ethics and the company states that there is review when an issue occurs. However, it is not clear that there are scheduled major reviews.

References:
Public:
TI notes:
Sustainability Report (January 2014), p.8:
‘Ethical Principles Committee (EPC) is made up of nine members and the secretariat is undertaken by the Human Resources Manager. The rest of the members are comprised of representatives from the Divisions, the Department of Legal Affairs and the Department of Procurement with the consent of the CEO. The members of the committee do not change frequently unless an organizational change occurs; they tend to serve for at least five years on the run.

EPC gathers at least once every four months and/or whenever there is an inquiry or breach. The CEO or one of the members of the committee can also request a meeting. Apart from immediate intervention to inquiries and breaches, the EPC act as the sense and the conscience of ASELSAN byremedying ethical problems as well as raising consciousness towards ethical principles within ASELSAN.

When there is an inquiry, the application is immediately reported to the EPC with the necessary background information and relevant documentation. Head of the committee with all the information gathered and the documentation reported informs the CEO and further investigation is carried out. At the end of the investigations, according to the laws and/or related ASELSAN directives, necessary precautions are taken. These inquiries and the actions to remedy those breaches are periodically reported at the Board Meetings.’
4. Internal Audit

In ASELSAN, internal audit activity evaluates and improves the effectiveness of corporate governance, risk management and internal control processes. The key role of the internal audit activity is to provide assurance to the Audit Committee and Board of Directors that risks are managed effectively. Annual audit plans and engagement programs are risk-based and audit results are periodically reported to the Audit Committee. Internal audit department assesses compliance with laws and regulations, applying and upholding the code of ethics, and the adequacy of controls intended to eliminate related risks.”
A8(a):
Is there a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, and evidence of improvement plans being implemented when issues are identified?

Score:

0

Comments:
Based on public information, there is no readily available evidence that there is a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, and no evidence of improvement plans being implemented when issues are identified.

References:
Public:
NA
A9:
Does the company have a formal process for review and where appropriate update its policies and practices in response to actual or alleged instances of corruption?

Score:

1

Comments:
Based on public information, there is some evidence that the company has a process for review and where appropriate updates its policies and practices in response to actual or alleged instances of corruption. However, the formality of the process with regard to updating policies and processes is not clear. The company therefore scores 1.

References:
Public:
Aselsan Sustainability Report (January 2014), p.8:
‘Ethical Principles Committee (EPC) is made up of nine members and the secretariat is undertaken by the Human Resources Manager. The rest of the members are comprised of representatives from the Divisions, the Department of Legal Affairs and the Department of Procurement with the consent of the CEO. The members of the committee do not change frequently unless an organizational change occurs; they tend to serve for at least five years on the run.

EPC gathers at least once every four months and/or whenever there is an inquiry or breach. The CEO or one of the members of the committee can also request a meeting. Apart from immediate intervention to inquiries and breaches, the EPC act as the sense and the conscience of ASELSAN by remediying ethical problems as well as raising consciousness towards ethical principles within ASELSAN.

When there is an inquiry, the application is immediately reported to the EPC with the necessary background information and relevant documentation. Head of the committee with all the information gathered and the documentation reported informs the CEO and further investigation is carried out. At the end of the investigations, according to the laws and/or related ASELSAN directives, necessary precautions are taken. These inquiries and the actions to remedy those breaches are periodically reported at the Board Meetings.’
A9(a):
Does the company have a formal anti-corruption risk assessment procedure implemented enterprise-wide?

Score:
0

Comments:
Based on public information, there is evidence that the company has a formal enterprise risk management procedure and an Early Detection and Management of Risk Committee. However, it is not clear that there is an anti-corruption risk assessment as part of this.

References:
Public:
TI notes:
Sustainability Report (January 2014), pp.10-11:
‘6. Risk Management
Enterprise Risk Management (ERM) is one of the building blocks of corporate governance and sustainable achievements. ASELSAN’s risk management functions were effectively restructured and strengthened to completely fulfill all the requirements of new arrangements which were recently implemented in Turkey. ASELSAN’s risk management process makes use of modern analysis methods that allow the implementation of a sophisticated and long-term production process requiring high technology; and continuously provides systematic input to the management’s decision making process.

Our ERM policy is to develop and apply effective and efficient methods and systems in order to predict and manage any potential risks that the Company may be subject to. Within this scope, the “Early Detection and Management of Risk Committee” was established in 2012 with the participation of Board Members in order to ensure the early identification of potential risks that may impact ASELSAN and to manage such risks in accordance with the Company’s risk taking profile.

Risks that may present any obstacle to ASELSAN in reaching its long-term targets are classified under headings such as strategic, operational, administrative, financial and external factors, and presented to the Board of Directors through periodic reports prepared by the Corporate Risk Management Committee, where the necessary measures are also discussed. Environmental risks are pursued on a corporate scale, kept view of regularly and
reported to upper level management.'

A10:

Does the company have a formal anti-corruption risk assessment procedure for assessing proposed business decisions, with clear requirements on the circumstances under which such a procedure should be applied?

Score:

0

Comments:

Based on public information, there is evidence that the company has a formal Enterprise Risk Management procedure and an Early Detection and Management of Risk Committee. However, it is not clear that there is an anti-corruption risk assessment as part of this and no evidence was found to indicate that this is applied to operational business decisions.

References:

Public:
TI notes:
Sustainability Report (January 2014), pp.10-11:
‘6. Risk Management

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Risks that may present any obstacle to ASELSAN in reaching its long-term targets are classified under headings such as strategic, operational, administrative, financial and external factors, and presented to the Board of Directors through periodic reports prepared
by the Corporate Risk Management Committee, where the necessary measures are also discussed. Environmental risks are pursued on a corporate scale, kept view of regularly and reported to upper level management.’

A11:
Does the company conduct due diligence that minimises corruption risk when selecting or reappointing its agents?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company conducts due diligence that minimises corruption risk when selecting or reappointing its agents.

References:
Public:
NA
A12:
Does the company have contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption.

References:
Public:
NA
A13:

Does the company make clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance?

Score:

1

Comments:

Based on public information, there is evidence that the company makes clear to suppliers, through policy terms, its stance on bribery and corruption and the consequences of breaches to this stance. It is not clear that the company has contractual rights to apply sanctions in the event of breaches of the contract. The company therefore scores 1.

References:

Public:
Company website: Ethics principles
‘Third party relationships of aselsan
ASELSAN evaluates and elects the corporations, dealers, business partners and suppliers it shall execute agreements with in a manner to provide the best service to its customers by means of prioritizing ASELSAN interests and with methods in conformity with transparency and equity principles.

It is unacceptable that ASELSAN Board of Directors members and employees execute individual agreements that would weaken ASELSAN's potential benefits in the negotiation process with companies that ASELSAN is possible to execute an agreement with or enter in activities causing the same or conduct financial transactions.

ASELSAN expects its suppliers to take similar principles as the basis, supports then in this respect and believes that a continuous cooperation will be maintained with such principles.

In all commercial activities of ASELSAN, the protection of TSKGV and ASELSAN interests constitutes the basis and abiding by all kinds of laws, regulations and creation of competition environment within the framework of directives is observed’.


Sustainability Report (January 2014), p.9:
‘Our ethical principles and codes of conduct clearly state our understanding of relations with third parties, giving and receiving gifts, personal use of ASELSAN’s assets and confidentiality. All of our employees, including the Board of Directors (and all of the employees’ first degree blood and affinity relatives), are not allowed to claim or accept gifts, individual services or support from third parties. Similarly, our suppliers are informed every year with a message that is published on our web site. In this information message, we emphasize that ASELSAN personnel are not allowed to accept any gifts for any celebratory purposes.’

(p.12): ‘Suppliers / Subcontractors
Supporting the progress of our suppliers is our key priority. Spreading “sustainability” as a common concept that must be shared and promoting and requesting compliance with all types of quality management and environmental standards are our key responsibilities for our suppliers. We consider Small and Mid-Sized Enterprises (SMEs) and companies in the subsidiary industry as our business partners. Only in 2012, ASELSAN paid a total of USD 210 million to 400 domestic subcontractors, 329 of which were SMEs.’

(p.15): ‘5. SUPPLY CHAIN
... We procure materials and services in the most cost effective manner while considering quality and on time deliveries. We communicate with each supplier with a fair and equitable treatment; provide them honest feedback on their performance. Our ethical codes and compliance to labor laws are most important factors that constitute our procedures and principals.’

(p.17): ‘We publish our Ethical Principles and Rules of Conduct in our company web site and expect that our ethic principles are shared and accepted by our suppliers too. We also believe that these ethic principles are necessary for sustainable supply chain and we are ready for corporation with our suppliers through these principles.’

Annual Report (2013), pp.88-89:
‘The supplier selection and evaluation procedure is a key process in ASELSAN’s sustainable supply chain. Suppliers are selected by conducting an equitable, transparent and neutral evaluation process. The company’s supplier selection and evaluation system creates a fair and open platform for any supplier intending to conduct business with ASELSAN. The following main issues are checked and measured in the supplier selection process, in accordance with ASELSAN’s supply chain values and/or international standards:
• Technological infrastructure including design, development, manufacture, measurement and test activities,
• Employing qualified personnel,
• Possessing an active and inclusion quality system,
• Possessing a strong, reliable and sustainable financial structure,'
• Compliance with ASELSAN’s supply chain policy,
• Compliance with the Environmental Management standards,
• Compliance with the Occupational Health and Safety Management standards,
• Compliance with the labor law, and
• Compliance with ethical standards

... In interim audits, suppliers are monitored and revaluated for compliance with the aforementioned issues, while suppliers unable to sustain compatibility with ASELSAN’s evaluation criteria are removed from its supply chain.

... Responsibilities of suppliers
ASELSAN publishes its ethical principles and rules of conduct on its corporate website and expects these ethical principles to be adopted and accepted by its suppliers, too. The Company also believes these ethical principles and values are necessary for the sustainable supply chain and it is ready to corporate with its suppliers through these principles.”
A13(a): Does the company explicitly address the corruption risks associated with offset contracting?

Score: 0

Comments: Based on public information, there is no readily available evidence that the company explicitly addresses the corruption risks associated with offset contracting.

References:

Public:

TI notes:

A13(b):
Does the company conduct due diligence that minimises corruption risk when selecting its offset partners and offset brokers?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company conducts due diligence that minimises corruption risk when selecting its offset partners and offset brokers.

References:
Public:
TI notes:
A15: Does the company have an anti-corruption policy that prohibits corruption in its various forms?

Score:

1

Comments: Based on public information, there is evidence that the company has an anti-corruption policy that prohibits corruption. However, it is limited with regard to bribery and some other forms of corruption such as kickbacks. The company therefore scores 1.

References:

Public:
Company website: Ethics principle
‘Code of Conduct
ASELSAN Board of Directors Members and employees;
With every behavior, creates a work environment allowing for an open exchange of ideas where they behave in politeness, sincerity, mutual tolerance and are respectful to each other.
Behave in a just and objective manner in professional relations with a professional point of view.
In their studies and in private life, abides by all laws, regulations, guidelines and rules and regulations that ASELSAN is subject to and control the same within the scope of their duties so as to ensure the compliance of ASELSAN employees to them.

Conducts against official institutions and officers
It is not considered as a proper behavior to provide the officers employed at public institutions with benefits in cash for the purpose of gaining business deals or other advantages.’

Sustainability Report (January 2014), p.9:
‘Our ethical principles and codes of conduct clearly state our understanding of relations with
ASELSAN 08/06/14
HTTP://WWW.ASELSAN.COM.TR/TR-TR/SAYFALAR/DEFAULT.ASPX
HTTP://WWW.ASELSAN.COM.TR/EN-US/PAGES/DEFAULT.ASPX
third parties, giving and receiving gifts, personal use of ASELSAN’s assets and confidentiality. All of our employees, including the Board of Directors (and all of the employees’ first degree blood and affinity relatives), are not allowed to claim or accept gifts, individual services or support from third parties. Similarly, our suppliers are informed every year with a message that is published on our web site. In this information message, we emphasize that ASELSAN personnel are not allowed to accept any gifts for any celebratory purposes.’
A16:
Is the anti-corruption policy explicitly one of zero tolerance?

Score:

0

Comments:
Based on public information, there is no readily available evidence of a zero-tolerance anti-corruption policy.

References:
Public:
NA
A17:
Is the company's anti-corruption policy easily accessible to Board members, employees, contracted staff and any other organisations acting with or on behalf of the company?

Score:

2

Comments:
Based on public information, there is evidence that the company’s anti-corruption policy is accessible to Board members, employees and third parties. The company’s ethic principles are available in Turkish and English.

References:
Public:
Company website: Ethic principles
‘Code of Conduct
ASELSAN Board of Directors Members and employees;
With every behavior, creates a work environment allowing for an open exchange of ideas where they behave in politeness, sincerity, mutual tolerance and are respectful to each other.
Behave in a just and objective manner in professional relations with a professional point of view.
In their studies and in private life, abides by all laws, regulations, guidelines and rules and regulations that ASELSAN is subject to and control the same within the scope of their duties so as to ensure the compliance of ASELSAN employees to them’.
A17(a):

Is the company’s anti-corruption policy easily understandable and clear to Board members, employees and third parties?

Score:

2

Comments:

Based on public information, there is evidence that the company’s anti-corruption policy is easily understandable and written in clear language.

References:

Public:
Company website:
A18:

Does the anti-corruption policy explicitly apply to all employees and members of the Board?

Score:

2

Comments:

Based on public information, there is evidence that the company’s anti-corruption policy is applicable to employees and members of the Board.

References:

Public:
Company website: Ethic principles
‘Ethical principles and code of conduct included in this document are abided by all Aselsan employees including the Board of Directors.’
A20:

Does the company have a policy on potential conflicts of interest, and does it apply to both employees and board members?

Score:

1

Comments:

Based on public information, there is evidence that the company has a policy on potential conflicts of interest. Despite including a brief definition, the company does not provide a number of examples of potential conflicts of interest. The company therefore scores 1.

References:

Public:
Company website: Ethic principles
‘Prevention of Conflict of Interest
Conflict of Interest expresses the general condition when the personal interests of ASELSAN Board of Directors and employees do not fit with the conflict of ASELSAN. As a principle, members of the ASELSAN Board of Directors may not conduct commercial transactions and may not compete with TSKGV Foundation linked partnerships. They may not attend the Board of Directors meetings with regard to the interests of them or of the relatives up to third degree by blood and marriage.
...
ASELSAN employees may not enter into an activity or approach that will create a conflict of interest with ASELSAN. In such cases, the situation is reported to the Board of Directors and the Corporate Governance Committee. Ethical principles and code of conduct included in this document are abided by all Aselsan employees including the Board of Directors.
...
Opportunities of Aselsan
It is not deemed appropriate that ASELSAN Board of Directors Members and employees use the opportunities with regard to ASELSAN fields of activity, ASELSAN authorities and possibilities with personal income purposes and enter into competition with ASELSAN.’
A21:
Does the company have a policy for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery?

Score:

1

Comments:
Based on public information, there is evidence that the company has a policy for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery. However, there is a lack of clarity with regard to the policy and no reference is made publicly to upper limits or a threshold that requires senior authorisation. The company therefore scores 1.

References:

Public:
Company website: Ethic principles
‘Gifts and Discounts
ASELSAN Board of Directors Members and employees may not demand or accept gifts, discounts and advantages, personal services or support from third parties including first degree relatives (mother, father, sibling, child, spouse) that would have an impact on ASELSan choices and decisions even if they are for charity purposes. Personal gifts and presents that would be submitted by authorities that cannot be rejected shall be preserved by means of recording in ASELSan inventory.

In this scope, it is not deemed appropriate that any kind of travel and accommodation expenses, attendance to social, cultural and sports activities that are not business related to be taken over by third parties. In the case of such take over, payment should be effected to the third party as per the applicable market price or actions should be taken for covering such payment by ASELSan.

Invitations that are directly related to activities such as job interviews or mutual studies (for example lunch that is within the hours of a meeting, a cocktail that is organized afterwards

ASELSAN 08/06/14
HTTP://WWW.ASELSAN.COM.TR/TR-TR/SAYFALAR/DEFAULT.ASPX
HTTP://WWW.ASELSAN.COM.TR/EN-US/PAGES/DEFAULT.ASPX
or dinners during the ongoing organizations) may be accepted. As for the visits; promotion products to a modest extent that could contribute in ASELSAN promotion may be granted as gifts.’


Sustainability Report (January 2014), p.9:
‘Our ethical principles and codes of conduct clearly state our understanding of relations with third parties, giving and receiving gifts, personal use of ASELSAN’s assets and confidentiality. All of our employees, including the Board of Directors (and all of the employees’ first degree blood and affinity relatives), are not allowed to claim or accept gifts, individual services or support from third parties. Similarly, our suppliers are informed every year with a message that is published on our web site. In this information message, we emphasize that ASELSAN personnel are not allowed to accept any gifts for any celebratory purposes.’
A22: 
Does the company's anti-corruption policy include a statement on the giving and receipt of hospitality that ensures that such transactions are bona fide and not a subterfuge for bribery?

Score:

1

Comments:

Based on public information, there is evidence of a statement on the giving and receipt of hospitality, that ensures that such transactions are bona fide and not a subterfuge for bribery. However, there is a lack of clarity with regard to the policy and no reference is made publicly to upper limits or a threshold that requires senior authorisation. The company therefore scores 1.

References:

Public:
Company website: Ethic principles
‘Gifts and Discounts
ASELSAN Board of Directors Members and employees may not demand or accept gifts, discounts and advantages, personal services or support from third parties including first degree relatives (mother, father, sibling, child, spouse) that would have an impact on AELSAN choices and decisions even if they are for charity purposes. Personal gifts and presents that would be submitted by authorities that cannot be rejected shall be preserved by means of recording in AELSAN inventory.

In this scope, it is not deemed appropriate that any kind of travel and accommodation expenses, attendance to social, cultural and sports activities that are not business related to be taken over by third parties. In the case of such take over, payment should be effected to the third party as per the applicable market price or actions should be taken for covering such payment by AELSAN.

Invitations that are directly related to activities such as job interviews or mutual studies (for example lunch that is within the hours of a meeting, a cocktail that is organized afterwards or dinners during the ongoing organizations) may be accepted. As for the visits; promotion
products to a modest extent that could contribute in ASELSAN promotion may be granted as gifts.'


Sustainability Report (January 2014), p.9:

‘Our ethical principles and codes of conduct clearly state our understanding of relations with third parties, giving and receiving gifts, personal use of ASELSAN’s assets and confidentiality. All of our employees, including the Board of Directors (and all of the employees’ first degree blood and affinity relatives), are not allowed to claim or accept gifts, individual services or support from third parties. Similarly, our suppliers are informed every year with a message that is published on our web site. In this information message, we emphasize that ASELSAN personnel are not allowed to accept any gifts for any celebratory purposes.’
A23:
Does the company have a policy that explicitly prohibits facilitation payments?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a policy that explicitly prohibits facilitation payments.

References:
Public:
TI notes:
Company website: Ethic principles
‘Behavior Towards Governmental Institutions and Authorities
Providing advantages in cash equivalents for the officers having a duty at governmental institutions in order to gain business or other benefits may not be accepted as a right manner of behavior.’
A24:
Does the company prohibit political contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent? Does the company record and publicly disclose all political contributions?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company prohibits political contributions, or regulates such contributions in order to prevent undue influence or other corrupt intent.

References:
Public:
NA
A25:
Does the company have a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, and discloses the issues on which the company lobbies?

Score: 0

Comments:
Based on public information, there is no readily available evidence that the company has a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, or discloses the issues on which the company lobbies.

References:
Public: NA
A25(a):
Does the company prohibit charitable contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent?

Score:

2

Comments:
Based on public information, there is evidence that the company regulates charitable contributions in order to prevent undue influence or other corrupt intent. The company also discloses the recipients of such contributions.

References:
Public:
Donation and Aid Policy, p.1:
‘As per sub-clause “k” of article 3 of our Company’s Articles of Association, provided that it is not contrary to the hidden profit distribution regulations of the Capital Market Law and that the donations, including the ones realized within the year are submitted to the information of the shareholders in the General Assembly and that the upper limit of the donations to be realized is determined by the general assembly, contributions in kind and/or financial aid and donation may be granted to/for,
- Institutions, entities, foundations and associations that conduct scientific research and development activities,
- Institutions and similar organizations with social purposes,
- The constructions of schools, health facilities, etc. which constitute public interest,
- Other activities deemed beneficial by the Company.
The Board of Directors is authorized to take a resolution with respect to granting donation or aid.
The donations realized within the relevant activity period in scope of the Capital Market Law are added to the distributable profit base.
The donations and aids that shall be granted with the resolution of Board of Directors within the upper limit determined by the General Assembly shall be publicly announced as per the legislation of Capital Market Board regarding the disclosure of material events to the public.’
http://www.aselsan.com.tr/en-us/InvestorRelations/Corporate-
Sustainability Report (January 2014), p.10:

‘We have prepared and publicly shared our Donation and Aid Policy. Every year during General Assembly meetings all shareholders are informed about the donations made in the previous fiscal year. The limit regarding the donations that can be made in a specific year is determined during the General Assembly meetings. A Board resolution is required for any kind of donation. According to our Donation and Aid Policy, financial donations and aids may be granted to/for,

- Institutions, entities, foundations and associations that conduct scientific research and development activities
- Institutions and similar organizations with social purposes,
- The constructions of schools, health facilities, etc. which constitute public interest,
- Other activities deemed beneficial by ASELSAN.’
A26:

Does the company provide written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda?

Score:

1

Comments:

Based on public information, there is some evidence that the company provides written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda. However, the Ethical Principles and Rules of Conduct document prepared for this purpose is not publicly available. The company therefore scores 1.

References:

Public:
Sustainability Report (January 2014), p.7:
‘3. Ethical Principles

All our employees are conscious that our company’s and our community’s long term interests are relying upon our society’s, public’s, customer’s, shareholder’s, stakeholder’s and our supply chain’s emphasis on highest of ethical standards.

Honesty, courtesy, sincerity, tolerance and respect to every other person shape our work environment and it is our ultimate hope that this sense of responsibility is transferred to everybody we get in touch with.

Complying with the values and ethical principles is of utmost importance for a member of our family at ASELSAN, be it the Board of Directors or top management team or our employees. In order to disseminate ethical values of ASELSAN to its employees and to future generations, ASELSAN produced “Ethical Principles and Rules of Conduct” document in 2007.

The main objective of this document is to lead and to educate the members of ASELSAN family, including the stakeholders and the supply chain, about the values and the ethical principles and to encourage the practice of ethical behaviors within our corporation and our ecosystem.
The “Ethical Principles and Rules of Conduct” document with its appendices is communicated to all ASELSAN employees. Their knowledge about and commitment to these values and principles is signed under a notification.

During the orientation program, designed by The Training Department, Ethical Principles and Rules of Conduct are communicated to all new employees. These new employees receive special training about these principles and rules if suggested by the Ethical Principles Committee.’
A27:
Does the company have a training programme that explicitly covers anti-corruption?

Score:
1

Comments:
Based on public information, there is evidence that the company has a training programme on its Ethical Principles and Rules of Conduct, which include an anti-corruption policy. However, there is no readily available evidence of an explicit anti-corruption module. The company therefore scores 1.

References:
Public:
Sustainability Report (January 2014), p.7:
‘During the orientation program, designed by The Training Department, Ethical Principles and Rules of Conduct are communicated to all new employees. These new employees receive special training about these principles and rules if suggested by the Ethical Principles Committee. Updates in the document and/or in its appendices are communicated to all employees immediately and, again, if suggested by the Ethical Principles Committee, training sessions is organized.’

(p.23): ‘ASELSAN emphasizes the significance and necessity of training and development of all employees at all levels. Training is planned by Training Department with the collaboration of all departments. All training needs are determined by departments and reported to Training Department. Training needs are determined due to the strategic training needs of the organization by strategic plan, quality standards, legal commitments and the career training procedure which describes the compulsory training for all the employees. Career training is determined according to present and future role of the employees. The aim of training provided to employees has diversity according to role of the employees. Our employees attend to different courses according to their needs, starting with orientation; they continuously take trainings about personal and occupational skill development, technical and operational knowledge and management.’
‘We inform our employees of our ethical principles as part of our orientation program.’
A28:
Is anti-corruption training provided in all countries where the company operates or has company sites?

Score:

2

Comments:
Based on public information, the company provides all new employees with training on the company’s Ethical Principles and Rules of Conduct, which include an anti-corruption policy.

References:
Public:
Sustainability Report (January 2014), p.7:
Complying with the values and ethical principles is of utmost importance for a member of our family at ASELSAN, be it the Board of Directors or top management team or our employees. In order to disseminate ethical values of ASELSAN to its employees and to future generations, ASELSAN produced “Ethical Principles and Rules of Conduct” document in 2007. The main objective of this document is to lead and to educate the members of ASELSAN family, including the stakeholders and the supply chain, about the values and the ethical principles and to encourage the practice of ethical behaviors within our corporation and our ecosystem. The “Ethical Principles and Rules of Conduct” document with its appendices is communicated to all ASELSAN employees. Their knowledge about and commitment to these values and principles is signed under a notification.
During the orientation program, designed by The Training Department, Ethical Principles and Rules of Conduct are communicated to all new employees. These new employees receive special training about these principles and rules if suggested by the Ethical Principles Committee.
Updates in the document and/or in its appendices are communicated to all employees immediately and, again, if suggested by the Ethical Principles Committee, training sessions is organized.’

(p.23): ‘ASELSAN emphasizes the significance and necessity of training and development of all employees at all levels. Training is planned by Training Department with the collaboration of all departments. All training needs are determined by departments and reported to
Training Department. Training needs are determined due to the strategic training needs of the organization by strategic plan, quality standards, legal commitments and the career training procedure which describes the compulsory training for all the employees. Career training is determined according to present and future role of the employees. The aim of training provided to employees has diversity according to role of the employees. Our employees attend to different courses according to their needs, starting with orientation; they continuously take trainings about personal and occupational skill development, technical and operational knowledge and management.’

Annual Report (2013), p.86:
‘We inform our employees of our ethical principles as part of our orientation program.’
A29:
Does the company provide targeted anti-corruption training to members of the Board?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company provides targeted anti-corruption training to members of the Board.

References:
Public:
NA
A30:

Does the company provide tailored ethics and anti-corruption training for employees in sensitive positions?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company provides tailored ethics and anti-corruption training for employees in sensitive positions. TI notes that the company affirms to train employees according to the role of the employees, but it is unclear if this includes ethics and anti-corruption training.

References:

Public:
TI notes:
Sustainability Report (January 2014), p.23:
‘ASELSAN emphasizes the significance and necessity of training and development of all employees at all levels. Training is planned by Training Department with the collaboration of all departments. All training needs are determined by departments and reported to Training Department. Training needs are determined due to the strategic training needs of the organization by strategic plan, quality standards, legal commitments and the career training procedure which describes the compulsory training for all the employees. Career training is determined according to present and future role of the employees. The aim of training provided to employees has diversity according to role of the employees. Our employees attend to different courses according to their needs, starting with orientation; they continuously take trainings about personal and occupational skill development, technical and operational knowledge and management.’
A31:
Does the company have a clear and formal process by which employees declare conflicts of interest?

Score:
1

Comments:
Based on public information, there is some evidence that the company has a process by which employees declare conflicts of interest to the Board of Directors and the Corporate Governance Committee. However, the formality of this process is not clear and it is not clear who should report the conflict. The company therefore scores 1.

References:
Public:
Company website: Ethic principles
‘Prevention of Conflict of Interest
Conflict of Interest expresses the general condition when the personal interests of ASELSAN Board of Directors and employees do not fit with the conflict of ASELSAN. As a principle, members of the ASELSAN Board of Directors may not conduct commercial transactions and may not compete with TSKGV Foundation linked partnerships. They may not attend the Board of Directors meetings with regard to the interests of them or of the relatives up to third degree by blood and marriage.

ASELSAN employees may not enter into an activity or approach that will create a conflict of interest with ASELSAN. In such cases, the situation is reported to the Board of Directors and the Corporate Governance Committee.

Ethical principles and code of conduct included in this document are abided by all Aselsan employees including the Board of Directors.

Opportunities of Aselsan
It is not deemed appropriate that ASELSAN Board of Directors Members and employees use the opportunities with regard to ASELSAN fields of activity, ASELSAN authorities and
possibilities with personal income purposes and enter into competition with ASELSAN.'

A32:
Is the company explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company is explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities.

References:

Public:
NA
A33:
Does the company have multiple, well-publicised channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee (e.g. web, phone, in person), to report concerns or instances of suspected corrupt activity?

Score:

1

Comments:
Based on public information, there is some evidence that the company has channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee, to report concerns or instances of suspected corrupt activity. However, there appear to be no independent channels and it is not clear how well the available channels are publicised. The company therefore scores 1.

References:

Public:
Annual Report (2013), p.86:
‘ASELSAN employees may obtain information concerning compliance with ethical principles and rules of conduct from the executives of their department and submit information about any behavior which they deem to be in violation of the ethical principles to ASELSAN’s Ethical Principles Board. Our Ethical Principles Board starts evaluating any notifications concerning behavior alleged to be in violation of the ethical principles within one day of notification, and keeps the upper management informed of the topic.’

(p.105): ‘The corporate governance structure of the Company gives the opportunity to all stakeholders including the employees and representatives to convey their worries with regard to transactions which are inappropriate in terms of legality and ethics. The Company employees have the opportunity to convey their expectations and requests through the representatives. The Company employees are informed about their financial and social rights over the intranet. Besides, there is an Employee Representative Agency in the Company where 40 representatives are present and which is formed by the Company personnel to enable the contact between the Company personnel and the management. The periodical meetings held with the employee representatives are the platforms where
employers and employees exchange their wishes, requests and opinions regarding the implementations. The meeting minutes formed as the result of these meetings are announced to all personnel through the employee representatives page on the intranet.’

(p.106): ‘Audit Committee is responsible for establishing the mechanism where the complaints regarding the unethical behaviors and acts against the regulations are evaluated, concluded and operated confidentially. The Committee is expected to complete its studies on this matter during 2014.’

Company website: Ethic principles
‘Incentives for Reporting of Improper Behaviours
All ASELSAN Board of Directors members and employees have the mission and right to ask questions and receive information related with the principles and rules described in this document and to notify the infringements to GROUP SUPERVISOR OF ASELSAN ETHICAL COMMITTEE. Not only bad and negative conduct against the person who notified an actual infringement in goodwill is unacceptable but also condemnations made against the truth by hiding his/her real identity cannot be tolerated. ASELSAN employees should inform their supervisors in case the notification is not responded or any form of negative behavior is encountered.’

A33(a):
Are the whistleblowing channels available to all employees in all geographies?

Score:

1

Comments:
Based on public information, there is evidence that across geographies, all employees have access to at least one whistleblowing channel. The company therefore scores 1. To score higher the company would need to provide evidence that across geographies, all employees have access to more than one reporting channel.

References:
Public:
Annual Report (2013), p.86:
‘ASELSAN employees may obtain information concerning compliance with ethical principles and rules of conduct from the executives of their department and submit information about any behavior which they deem to be in violation of the ethical principles to ASELSAN’s Ethical Principles Board. Our Ethical Principles Board starts evaluating any notifications concerning behavior alleged to be in violation of the ethical principles within one day of notification, and keeps the upper management informed of the topic.’

(p.105): ‘The corporate governance structure of the Company gives the opportunity to all stakeholders including the employees and representatives to convey their worries with regard to transactions which are inappropriate in terms of legality and ethics. The Company employees have the opportunity to convey their expectations and requests through the representatives. The Company employees are informed about their financial and social rights over the intranet. Besides, there is an Employee Representative Agency in the Company where 40 representatives are present and which is formed by the Company personnel to enable the contact between the Company personnel and the management. The periodical meetings held with the employee representatives are the platforms where employers and employees exchange their wishes, requests and opinions regarding the implementations. The meeting minutes formed as the result of these meetings are announced to all personnel through the employee representatives page on the intranet.’
(p.106): ‘Audit Committee is responsible for establishing the mechanism where the complaints regarding the unethical behaviors and acts against the regulations are evaluated, concluded and operated confidentially. The Committee is expected to complete its studies on this matter during 2014.’

Company website: Ethic principles
‘Incentives for Reporting of Improper Behaviours
All ASELSAN Board of Directors members and employees have the mission and right to ask questions and receive information related with the principles and rules described in this document and to notify the infringements to GROUP SUPERVISOR OF ASELSAN ETHICAL COMMITTEE. Not only bad and negative conduct against the person who notified an actual infringement in goodwill is unacceptable but also condemnations made against the truth by hiding his/her real identity cannot be tolerated. ASELSAN employees should inform their supervisors in case the notification is not responded or any form of negative behavior is encountered.’

A33(b):
Does the company have formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively.

References:
Public:
TI notes:
Company website: Ethic principles
‘Promoting the Reporting of Inappropriate Behavior
All ASELSAN Board of Directors Members and employees, are entitled and have the duty to ask questions, receiving information and inform all violations to ASELSAN ETHICAL Board Group Responsible. Negative and bad treatment towards any person informing a real violation in goodwill may not be accepted and neither accusations contrary to facts realized with hiding identities may be deemed appropriate. In the case the information is not responded to or is responded in a negative manner, ASELSAN employees should inform their superiors.’
A34:
Does the company have well-publicised resources available to all employees where help and advice can be sought on corruption-related issues?

Score:

1

Comments:
Based on public information, there is evidence that the company has well-publicised resources available to all employees where help and advice can be sought on corruption-related issues. However, it is not clear that all of these individuals have been trained for this job. The company therefore scores 1.

References:
Public:
Company website: Ethic principles
‘Promoting the Reporting of Inappropriate Behavior
All ASELSAN Board of Directors Members and employees, are entitled and have the duty to ask questions, receiving information and inform all violations to ASELSAN ETHICAL Board Group Responsible. Negative and bad treatment towards any person informing a real violation in goodwill may not be accepted and neither accusations contrary to facts realized with hiding identities may be deemed appropriate. In the case the information is not responded to or is responded in a negative manner, ASELSAN employees should inform their superiors.’

Sustainability Report (January 2014), p.33:
‘ASELSAN managers’ “open door” policy enables employees to speak directly with all levels of management including CEO and Board of Directors about their ideas, concerns, or problems, and to collaborate with managers to address workplace issues.’

Annual Report (2013), p.86:
‘ASELSAN employees may obtain information concerning compliance with ethical principles and rules of conduct from the executives of their department and submit information about
any behavior which they deem to be in violation of the ethical principles to ASELSAN’s Ethical Principles Board. Our Ethical Principles Board starts evaluating any notifications concerning behavior alleged to be in violation of the ethical principles within one day of notification, and keeps the upper management informed of the topic.’
A35:
Is there a commitment to non-retaliation for bona fide reporting of corruption?

Score:

1

Comments:
Based on public information, there is evidence that there is a commitment to non-retaliation for bona fide reporting of corruption. However, there is no readily available evidence that disciplinary measures are applied to employees who breach this policy. The company therefore scores 1.

References:
Public:
Company website: Ethic principles
‘Promoting the Reporting of Inappropriate Behavior
All ASELSAN Board of Directors Members and employees, are entitled and have the duty to ask questions, receiving information and inform all violations to ASELSAN ETHICAL Board Group Responsible. Negative and bad treatment towards any person informing a real violation in goodwill may not be accepted and neither accusations contrary to facts realized with hiding identities may be deemed appropriate. In the case the information is not responded to or is responded in a negative manner, ASELSAN employees should inform their superiors.’
Information Sources

Company website:

Annual Report (2013):

Board of Directors’ Early Detection and Management of Risk Committee Work Directives:

Donation and Aid Policy:

Sustainability Report (January 2014):