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

The following table represents a summary of your scores:

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<thead>
<tr>
<th>Topic</th>
<th>Number of questions</th>
<th>% score based on public information</th>
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<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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<td>Company Policy and Codes</td>
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<td>70.8%</td>
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<tr>
<td>Training</td>
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<td>Personnel and Helplines</td>
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<td>50%</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>41</strong></td>
<td><strong>37.8%</strong></td>
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</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 CEO or 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 company’s CEO or 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 CEO demonstrates a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company.

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:

1

Comments:

Based on public information, there is some evidence that the company publishes a statement of values representing high standards of business conduct, including integrity, openness and honesty. The company therefore scores 1. To score higher the company would need to provide evidence of other such values and display that they are explained in detail.

References:

Public:
Code of Conduct (2013), p.1:
‘The Company places the highest value on the integrity of each of its employees and Representatives’

(p.2): ‘We Seek Business Openly and Honestly
Sales are the lifeblood of the organization, and we will market our technologies, products and services fairly and vigorously based on their proven quality, integrity, reliability and price. Curtiss-Wright strictly prohibits bribes, kickbacks or any other form of improper payment, direct or indirect, to any representative of government, labor union, customer or supplier in order to obtain a contract, some other commercial benefit or government action.’

(p.10): ‘We Report with Integrity
Curtiss-Wright’s financial, accounting, and other reports and records will accurately and fairly reflect the transactions of the Company in reasonable detail, and in accordance with approved accounting practices and procedures and applicable government regulations.’

(p.11): ‘Senior Financial Officers will exhibit and promote the highest standards of honest
and ethical conduct through the establishment and operation of policies and procedures’
‘Encourage and reward professional integrity in all aspects of the financial organization, by eliminating inhibitions and barriers to responsible behavior, such as coercion, fear of reprisal, or alienation from the financial organization or the enterprise itself’

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:
2

Comments:
Based on public information, there is evidence that the company is a signatory to the Defense Industry Initiative (DII).

References:
Public:
http://www.dii.org/signatories
A6:  
Has the company appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda.

References:
Public:
NA
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.

References:
Public: NA
A8:
Is there regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda?

Score:

1

Comments:
Based on public information, there is some evidence that there is regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda. The Board reviews the Corporate Governance Guidelines annually. However, there is no evidence that a major review of the entire agenda is conducted at least annually. The company therefore scores 1.

References:
Public:
Corporate Governance Guidelines (2012), p.9:
‘The Board shall review and reassess the adequacy of this Code annually and make any amendments to this Code that the Board deems appropriate’
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 of 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:

0

Comments:
Based on public information, there is no readily available evidence that the company has a formal process for review and where appropriate update its policies and practices in response to actual or alleged instances of corruption.

References:

Public:
NA
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 no readily available evidence that the company has a formal anti-corruption risk assessment procedure implemented enterprise-wide. TI notes that the company undertakes risk management, which is overseen by the Committee on Directors and Governance, but evidence does not suggest this relates specifically to anti-corruption.

References:
Public:
TI notes:
Proxy (2014), p.13:
‘While the Board has the ultimate oversight responsibility for risk management processes, various committees of the Board composed entirely of independent directors also have responsibility for aspects of risk management. The Audit Committee of the Board, acting pursuant to its written charter, serves as the principal agent of the Board in fulfilling the Board’s oversight of risk assessment and management. The Audit Committee also performs a central oversight role with respect to financial reporting and compliance risks. The Executive Compensation Committee considers risks in connection with its design of compensation programs for the Company’s employees, including the executive officers. The Finance Committee is responsible for assessing risks related to financing matters such as pension plans, capital structure, and equity and debt issuances. The Committee on Directors and Governance oversees risk related to the Company’s overall governance, including Board and committee composition, Board size and structure, Director independence, ethical and business conduct, and the Company’s corporate governance profile and ratings.

The Board and its committees are kept informed by various reports on risk identification and mitigation provided to them on a regular basis, including reports made at the Board and Committee meetings by management. For example, the Company’s Chief Risk Officer and internal audit function maintain oversight over the key areas of the Company’s financial processes and controls, and report periodically directly to the Audit Committee for the purpose of assessing and evaluating major strategic, operational, regulatory, information
management, and external risks in the Company’s business. The Audit Committee then reviews with management such risks and the steps management has taken to monitor, mitigate, and control such risks."

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 no available evidence that the company has 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.

References:
Public:
NA
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 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. TI notes that agents are responsible for complying with all applicable laws, regulations and the Code of Conduct. However, there is no evidence of procedures and contractual rights in place that are monitored and audited to counter corruption.

References:
Public:
TI notes:
Code of Conduct (2013), p.1:
‘All employees, agents, and consultants of Curtiss-Wright are responsible for complying with all applicable laws, regulations and this Code of Conduct.’
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 the company makes it clear that contractors, sub-contractors, and suppliers must comply with all the applicable laws and show high ethical standards. The company has a zero tolerance for bribery, kickbacks and other improper payments. However, it is not clear whether sanctions are applied in the event of breach of contract. The company therefore scores 1.

References:
Public:
Code of Conduct (2013), p.13:
‘The Company will enter into representation or supplier agreements only with companies that have a demonstrated record of and commitment to the highest ethical standards. Efforts will be taken by Curtiss-Wright to ensure that agents, consultants, and representatives are aware of this Code. The Company will seek to inform our agents, consultants, and representatives of their responsibility to act in behalf of Curtiss-Wright consistent with the Code, other Curtiss-Wright policies and any applicable law or regulation.’

Code of Conduct (2013), p.2:
‘Curtiss-Wright strictly prohibits bribes, kickbacks or any other form of improper payment, direct or indirect, to any representative of government, labour union, customer of supplier in order to obtain a contract, some other commercial benefit or government action. The Company also strictly prohibits any employee from accepting such payments from anyone.’
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:
Company website: Offset/ Counter Trade
‘Our global partners give us the flexibility to fulfill offset obligations with no additional costs to the end customer. We diligently select our suppliers on the basis of customer requirements, ensuring each partner is a specialist in their field. The ongoing auditing and continuous monitoring of all suppliers guarantee first-class quality.’
http://www.cwat.ch/index.php?id=166
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:
See references for A13(a)
A15:
Does the company have an anti-corruption policy that prohibits corruption in its various forms?

Score:
2

Comments:
Based on public information, there is evidence that the company has an anti-corruption policy that prohibits corruption in its various forms.

References:
Public:
Code of Conduct (2013), p.2:
‘Curtiss-Wright strictly prohibits bribes, kickbacks or any other form of improper payment, direct or indirect, to any representative of government, labor union, customer or supplier in order to obtain a contract, some other commercial benefit or government action. The Company also strictly prohibits any employee from accepting such payments from anyone.’

(p.4): ‘The Foreign Corrupt Practices Act (FCPA) prohibits Curtiss-Wright from making a payment or giving a gift to a foreign government official, political party or candidate or public international organisation (‘foreign official’) for purposes of obtaining or retaining business. The FCPA applies to Curtiss-Wright everywhere in the world we do business.’
A16: Is the anti-corruption policy explicitly one of zero tolerance?

Score: 2

Comments: Based on public information, there is evidence that the anti-corruption policy is explicitly one of zero tolerance.

References:
Public:
Code of Conduct (2013), p.2:
‘Curtiss-Wright strictly prohibits bribes, kickbacks or any other form of improper payment, direct or indirect, to any representative of government, labor union, customer or supplier in order to obtain a contract, some other commercial benefit or government action. The Company also strictly prohibits any employee from accepting such payments from anyone.’
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:

1

Comments:
Based on public information, there is evidence that the company has an anti-corruption policy that is easily accessible to Board members, employees, contracted staff and any other organisations acting with or on behalf of the company. The company provides information about the anti-bribery policy on its intranet. However, evidence does not suggest that the policy is available in any other language except English. The company therefore scores 1.

References:
Public:
Code of Conduct (2013), p.2:
‘Please review Policy No. 11, Anti-Bribery, found along with other Curtiss-Wright corporate policies at https://www.mycurtisswright.com/ for detailed guidance on avoiding bribery and other corruption issues’

Proxy (2014), p.10:
‘The Company’s code of conduct is available within the Corporate Governance section of the Company’s website at www.curtisswright.com or by sending a request in writing to the Corporate Secretary, Curtiss-Wright Corporation, 13925 Ballantyne Corporate Place, Suite 400, Charlotte, North Carolina 28277.’
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 clear to Board members, employees and third parties. The company’s policy is clearly written in a comprehensible language, and is easily understood by a non-legal audience.

References:
Public:
Code of Conduct (2013), p.2:
‘We strictly prohibit bribes, kickbacks or any other form of improper payment, direct or indirect, to any representative of government, labor union, customer or supplier in order to obtain a contract, some other commercial benefit or government action. The Company also strictly prohibits any employee from accepting such payments from anyone.’
‘We will not offer our existing or potential commercial customers gifts of favors of more than nominal value (approximately $100 or less). Reasonable business entertainment is permitted, including traditional promotional events, as long as what is offered is consistent with usual business practice, cannot be construed as a bribe or payoff, is not in violation of any law and would not embarrass the Company or ourselves if disclosed publicly.’
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 anti-corruption policy explicitly applies to all employees and members of the Board. The company states that the Code of Conduct, which includes an anti-corruption policy, applies to all employees. The Corporate Governance Guidelines indicate that the anti-corruption policy applies explicitly to the members of the Board.

References:

Public:
Code of Conduct (2013), p.1:
‘The policies in this Code apply across Curtiss-Wright, in all businesses, countries, and regions, unless otherwise specifically noted. It covers all employees, officers and agents of Curtiss-Wright’

Corporate Governance Guidelines (2012) under Conflicts of interest – p.6-7:
‘Directors must avoid any conflicts of interest between themselves and the Company. If a Director believes that the Director has an actual or potential conflict of interest with the Company, the Director shall notify the Chairman of the Committee on Directors and Governance (or in the case of an issue involving the Chairman of the Committee on Directors and Governance, the members of the Committee on Directors and Governance) as promptly as practicable and shall not participate in any decisions by the Board that in any way relates ot the matter that gives rise to the conflict of interest.

A “conflict of interest” can occur when a Director’s personal interest interferes in any way – or appears to interfere with – the interests of the Company. A conflict situation can arise when a Director takes actions or has interests that may make it difficult to perform his or her work as a Director objectively and effectively. Conflicts of interest also arise when a
Director, or a member of his or her immediate family receives improper personal benefits as a result of his or her position as a Director. “Immediate family” includes a Director’s spouse, parents, children, siblings, mothers-in-law and fathers-in-law, sons and daughters-in-law, brothers and sisters-in-law, and anyone (other than domestic employees) who shares such Director’s home.’

A20:
Does the company have a policy on potential conflicts of interest, and does it apply to both employees and board members?

Score:

2

Comments:
Based on public information, there is evidence that the company has a policy on potential conflicts of interest, which applies to both employees and for Directors. The policy contains a definition and examples of potential conflicts of interest.

References:
Public:
Code of Conduct (2013), p.7:
‘We and our immediate families will avoid any situation that may create, seem to create, or be perceived to create a conflict between our personal interests and the interests of the Company.

A conflict, or appearance of a conflict, might arise, for example, by accepting a gift from a current or potential customer, supplier or competitor; owning a financial interest (other than share holdings in a publicly traded company) in, or serving in a business capacity with, an outside enterprise that does or wishes to do business with, or is a competitor of, the Company; serving as an intermediary for the benefit of a third party in transactions involving the Company; using confidential Company information or other corporate assets for personal profit, conducting business for another enterprise during our normal working hours or using Company property to conduct business for another enterprise.

We will take necessary steps to avoid improper reporting relationships and not directly or indirectly supervise or report to persons with whom we have a family or a close personal relationship.

If a conflict of interest or appearance of a conflict of interest develops, the employee should disclose the issue to a member of the leadership team related to the business in which the conflict arises for review with the Law Department and appropriate action, if necessary.’
Corporate Governance Guidelines (2012), p.6:

‘Directors must avoid any conflicts of interest between themselves and the Company. If a Director believes that the Director has an actual or potential conflict of interest with the Company, the Director shall notify the Chairman of the Committee on Directors and Governance (or in this case of an issue involving the Chairman of the Committee on Directors and Governance, the members of the Committee on Directors and Governance) as promptly as practicable and shall not participate in any decision by the Board that in any way relates to the matter that gives rise to the conflict of interest.

A ‘conflict of interest’ can occur when a Director’s personal interest interferes in any way – or even appears to interfere with – the interests of the Company. A conflict situation can arise when a Director takes actions or has interests that may make it difficult to perform his or her work as a Director objectively and effectively. Conflicts of interest also arise when a Director, or a member of his or her immediate family, receives improper personal benefits as a result of his or her position as a Director. ‘Immediate family’ includes a Director’s spouse, parents, children, siblings, mothers-in-law, and anyone (other than domestic employees) who shares such Director’s home.

In situations where a Director may not be certain whether a particular situation raises a potential conflict with the Company’s interests, the Director should consult with the General Counsel to obtain information necessary to make a determination. For example, the Director may not know whether a company with which he or she has a relationship is a potential customer, vendor or competitor of the Company.’

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: 
2

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. In particular, the company clearly sets upper limits for gift exchange.

References: 
Public: 
Code of Conduct (2013), p.2: 
‘We will not offer our existing or potential commercial customers gifts or favors of more than nominal value (approximately $100 or less). Reasonable business entertainment is permitted, including traditional promotional events, as long as what is offered is consistent with usual business practice, cannot be construed as a bribe or a payoff, is not in violation of any law and would not embarrass the Company or ourselves if disclosed publicly. Where a customer or potential customer notifies Curtiss-Wright of a policy or preference in which it prohibits or limits gifts to the customers’ employees, Curtiss-Wright will respect such notification.’ 

p.6: 
‘We will not be influenced by gifts of favors of any kinds from our suppliers or potential suppliers. The Company expects each employee to exercise reasonable judgment and discretion in accepting any gratuity or gift offered to the employee in connection with employment at Curtiss-Wright. It is Curtiss-Wright policy to discourage the receipt of gifts either directly or indirectly by employees as any gift may be misconstrued as an attempt to influence business decisions. This does not apply to unsolicited promotional materials of a general advertising nature, such as imprinted pencils, memo pad and calendars as long as what is given is accepted without any express or implied understanding that the recipient is in any way obligated. Presentations of a ceremonial nature in keeping with national custom may be permitted as long as what is accepted is not in violation of any law, cannot be construed as a bribe or a
payoff and would not embarrass the Company or ourselves if disclosed publicly.

Gifts of nominal value (less than $100) are permitted, provided they are given as a gesture of professional friendship, and do not involve a Company commitment having to do with the transaction of business.

An occasional meal or entertainment in the normal course of business relations, paid for by a supplier or potential supplier, is permitted provided that a representative of the supplier is in the attendance and such hospitality is not excessive or unusual in nature.

It is never acceptable to solicit gifts, gratuities, or business courtesies for the benefit of a Curtiss-Wright employee, family member or friend.’

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:

2

Comments:
Based on public information, there is evidence that the company has a policy for the giving and receipt of hospitality, to ensure that such transactions are bona fide and not a subterfuge for bribery. In particular, the company sets upper limits for hospitality exchange.

References:
Public:
Code of Conduct (2013), p.2:
‘We will not offer our existing or potential commercial customers gifts or favors of more than nominal value (approximately $100 or less). Reasonable business entertainment is permitted, including traditional promotional events, as long as what is offered is consistent with usual business practice, cannot be construed as a bribe or a payoff, is not in violation of any law and would not embarrass the Company or ourselves if disclosed publicly. Where a customer or potential customer notifies Curtiss-Wright of a policy or preference in which it prohibits or limits gifts to the customers’ employees, Curtiss-Wright will respect such notification.’

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An occasional meal or entertainment in the normal course of business relations, paid for by a supplier or potential supplier, is permitted provided that a representative of the supplier is in the attendance and such hospitality is not excessive or unusual in nature.

It is never acceptable to solicit gifts, gratuities, or business courtesies for the benefit of a Curtiss-Wright employee, family member or friend.

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:
NA
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:

2

Comments:

Based on public information, there is evidence that the company prohibits political contributions, except in particular cases. The company prohibits political contributions, unless they are individual contributions related to personal interest or if the law allows the company to make such contributions. In the latter case, a permission for such expenditure is required.

References:

Public:
Code of Conduct (2013), p.4:
‘The Foreign Corrupt Practices Act (FCPA) prohibits Curtiss-Wright from making a payment or giving a gift to a foreign government official, political party or candidate or public international organization (‘foreign official’) for purposes of obtaining or retaining businesses.’

p.12:
‘Company policy does not allow Company funds to be used for political contributions, directly or indirectly, in support of any party or candidate in any election on the federal, state or local level.
Wherever lawful, however, the Company may contribute to an occasional local initiative or referendum campaign where Curtiss-Wright’s interests are directly involved. Such payments, however, require advance clearance from the Law and Government Relations Departments.
As interested citizens, Curtiss-Wright employees are free to make individual, personal contributions to candidates of their choice.’
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:

0

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

References:

Public:
NA
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 detailed guidance is only available on the company intranet and it is therefore not possible to assess whether this includes illustrations of particular situations or case studies. The Code of Conduct includes some scenarios to explain the anti-corruption agenda. The company therefore scores 1.

References:

Public:
Code of Conduct (2013), pp.2-3:
‘Please review Policy No. 11, Anti-Bribery, found along with the other Curtiss-Wright corporate policies at https://mycurtisswright.com/ for detailed guidance on avoiding bribery and other corruption issues.

We will not offer our existing or potential commercial customers gifts or favors of more than nominal value (approximately $100 or less). Reasonable business entertainment is permitted, including traditional promotional events, as long as what is offered is consistent with usual business practice, cannot be construed as a bribe or a payoff, is not in violation of any law and would not embarrass the Company or ourselves if disclosed publicly.

Where a customer or potential customer notifies Curtiss-Wright of a policy or preference in which it prohibits or limits gifts to the customer’s employees, Curtiss-Wright will respect such notification.’

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 provides training for the Code of Conduct, which includes an anti-corruption policy. However, there is no evidence that the company has an explicit anti-corruption module. The company therefore scores 1.

References:

Public:
Code of Conduct (2013), p.7:
‘The Company will provide training and educational materials, including this Code and various legal and other compliance materials, so that we are informed of Curtiss-Wright’s ethical standards and our requirement to comply with all laws and Company policies.’
A28: Is anti-corruption training provided in all countries where the company operates or has company sites?

Score: 0

Comments: Based on public information, there is no readily available evidence that anti-corruption training is provided in all countries where the company operates or has company sites.

References:
Public:
TI notes:
Code of Conduct (2013), p.7:
‘The Company will provide training and educational materials, including this Code and various legal and other compliance materials, so that we are informed of Curtiss-Wright’s ethical standards and our requirement to comply with all laws and Company policies.’
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.

References:
Public:
NA
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 evidence that the company has a formal process by which employees declare conflicts of interest. The employees are encouraged to disclose the issue to a member of the leadership team for review with the Law Department. However, the details of the process are not made clear, specifically in regard to the Law Department’s review of each disclosure. The company therefore scores 1.

References:
Public:
Code of Conduct (2013), p.7:
‘If a conflict of interest or appearance of a conflict of interest develops, the employee should disclose the issue to a member of the leadership team related to the business in which the conflict arises for review with the Law Department and appropriate action, if necessary.’
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:

1

Comments:
Based on public information, there is evidence that the company ‘may’ apply disciplinary procedures to employees found to have violated the Code of Conduct. The company therefore scores 1. To score higher it must be stated that disciplinary procedures also apply to Board members, and that any violations ‘will’ result in disciplinary action.

References:

Public:

Code of Conduct (2013), p.14:

‘Failure to comply with the Code of Conduct may result in disciplinary action, up to and including termination, as appropriate, and may also require restitution or reimbursement from the employee and referral of the matter to government authorities under the guidance of the Law Department. Discipline may also be imposed for conduct that is considered unethical or improper even if the conduct is not 15 specifically covered by this Code’

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 evidence that employees can report concerns or instances of suspected corrupt activity using multiple, well-publicised channels. Employees can send reports to a member of Law Department or call the Code of Conduct helpline anonymously, with the contact details available on the company website. However, there is no evidence of an independent reporting channel. The company therefore scores 1.

References:

Public:
Code of Conduct (2013), p.7:
‘The Company will provide the channels through which we are able to report suspected violations of our Code or other Company policy.
To the extent possible, the Company will maintain the confidentiality of our communications about suspected violations that are made in good faith, except where law or policy may require disclosure.’

p.14:
Employees shall report violations of laws, regulations, company policies or the Code of Conduct through their normal reporting channels, to a member of the Law Department or by calling the Code of Conduct Helpline (1-800-554-7109 in the United States; or 0800280394 in the United Kingdom; or 0800-561119 in Switzerland; or 10-800-712-2380 in Northern China and 10-800-120-2380 in Southern China). Employees may report anonymously if they are unwilling to provide their name. (Reporting anonymously makes the investigation of allegations more difficult, since there is no ability to follow up with the employee to obtain additional detail). This helpline is not intended to replace normal supervisory channels for reporting questionable conduct or seeking advice about
appropriate ethical behavior.’
A33(a):
Are the whistleblowing channels available to all employees in all geographies?

Score:

2

Comments:
Based on public information, there is evidence that whistleblowing channels are available to all employees, in all geographies. Employees may contact the Law Department and the Code of Conduct helpline is available in the United States, United Kingdom, Switzerland and China.

References:
Public:
Code of Conduct (2013), p.14:
Employees shall report violations of laws, regulations, company policies or the Code of Conduct through their normal reporting channels, to a member of the Law Department or by calling the Code of Conduct Helpline (1-800-554-7109 in the United States; or 08-000280394 in the United Kingdom; or 0800-561119 in Switzerland; or 10-800-712-2380 in Northern China and 10-800-120-2380 in Southern China). Employees may report anonymously if they are unwilling to provide their name. (Reporting anonymously makes the investigation of allegations more difficult, since there is no ability to follow up with the employee to obtain additional detail). This helpline is not intended to replace normal supervisory channels for reporting questionable conduct or seeking advice about appropriate ethical behavior.’

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:
NA
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 some evidence that the company has well-publicised resources available to all employees where help and advice can be sought on corruption-related issues. Employees are directed to contact the Law Department. However, it is not clear that staff in this department are trained for this role. The company therefore scores 1.

References:
Public:
Code of Conduct (2013), p.4:
‘A violation occurs when a payment is made or promised to be made to a foreign official while knowing that the payment will be used to unlawfully obtain or maintain business or direct business to anyone else. Employees should contact a member of the Law Department with questions’

p.14:
‘Employees shall report violations of laws, regulations, company policies or the Code of Conduct through their normal reporting channels, to a member of the Law Department or by calling the Code of Conduct Helpline (1-800-554-7109 in the United States; or 08-000280394 in the United Kingdom; or 0800-561119 in Switzerland; or 10-800-712-2380 in Northern China and 10-800-120-2380 in Southern China). Employees may report anonymously if they are unwilling to provide their name. (Reporting anonymously makes the investigation of allegations more difficult, since there is no ability to follow up with the employee to obtain additional detail). This helpline is not intended to replace normal supervisory channels for reporting questionable conduct or seeking advice about appropriate ethical behavior.’

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 evidence to indicate that breaches of this commitment will result in disciplinary procedures. The company therefore scores 1.

References:
Public:
Code of Conduct (2013), p.14:
‘Any employee who in good faith raises an issue regarding a possible violation of law or Company policy will not be subject to retaliation and their confidentiality will be protected to the extent possible, consistent with law and corporate policy and the requirements necessary to conduct an effective investigation.’
Information Sources:

Company website:  
www.curtisswright.com

Code of Conduct (July 2013):  

Corporate Governance Guidelines (November 2012):  

Annual Reports and Proxy Statements:  