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>0%</td>
</tr>
<tr>
<td>Risk Management</td>
<td>7</td>
<td>7.1%</td>
</tr>
<tr>
<td>Company Policy and Codes</td>
<td>12</td>
<td>0%</td>
</tr>
<tr>
<td>Training</td>
<td>5</td>
<td>0%</td>
</tr>
<tr>
<td>Personnel and Helplines</td>
<td>7</td>
<td>0%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>41</strong></td>
<td><strong>1.2%</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 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.

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.

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:

0

Comments:

Based on public information, there is no readily available evidence that the company publishes a statement of values representing high standards of business conduct, including honesty, trust, transparency, openness, integrity and accountability.

References:

Public: 
NA
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:
TI notes:
ADS website: General Atomics Aeronautical Systems UK Ltd.
General Atomics Aeronautical Systems UK Ltd. is a member of ADS.
https://members.adsgroup.org.uk/directory/general-atomics-aeronautical-systems-uk-ltd
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:

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.

References:

Public:
NA
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, or 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 updates 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.

References:
Public:
NA
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 readily available evidence that the company has a formal anti-corruption risk assessment procedure for assessing proposed business decisions.

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 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 limited evidence that the company makes clear to contractors, sub-contractors, and suppliers, its stance on bribery and corruption and the consequences of breaches to this stance. Contractual regulations for suppliers that specifically address bribery and corruption are stated, albeit that they are understood to be drawn from U.S. federal government guidelines, rather than forming company policy. The company therefore scores 1.

References:
Public:
Terms And Conditions For Orders Issued Under Department Of Energy Contracts (December 2011), p.5:
‘A-18 Compliance With Laws
Seller understands and acknowledges that Buyer is committed to compliance with all domestic and foreign laws affecting its business and operations. Seller agrees that in performing its duties under the Order, Seller will conduct itself in strict adherence to all applicable laws, rules, and regulations.’

(P.9): ‘A-28 Indemnification
Seller, its subcontractors, agents, and/or employees agree to indemnify and save harmless and defend Buyer from and against any and all fines, penalties, offsets, claims, demands, actions, debts, liabilities, judgments, costs and attorney’s fees, costs and profit disallowed or reduced by Buyer’s customer arising out of claims on account of, or in any manner predicated upon:
[...] (4) violation by the Seller of the Code of Business Ethics and Conduct (FAR 52.203-13)’
Representations, Certifications And Other Statements Of Offerors Or Quoters (Department Of Defense) (September 2011), p.24:

‘Anti-Corruption Compliance. Offeror represents and warrants to Buyer that:

(a) Offeror is familiar with the terms and provisions of and agrees to comply with the U.S. Foreign Corrupt Practices Act (the "FCPA") and any applicable international and local country anti-bribery and anti-corruption laws and regulations (the FCPA and such applicable international and local country laws and rules are individually and collectively referred to as “Anti-Corruption Laws”) and the purposes of such Anti-Corruption Laws.

(b) Offeror is familiar with, and agrees to comply with, the FCPA prohibition on the offering, authorization, payment or giving of anything of value, either directly or indirectly, to an official of a non-U.S. government or a public international organization, or any other person of similar authority for the purpose of (i) influencing any act or decision by that person in his/her official capacity, (ii) inducing that person to do or omit any act in violation of his/her official capacity, (iii) inducing that person to influence an act or decision of the governmental or international organization in order to obtain or retain business for, or direct business to, any person, or (iv) to secure any improper advantage.

(c) Neither Offeror nor any of its employees, representatives and/or agents is an official, officer, employee or representative of any public international organization, government or political party or a candidate for political office.

Offeror acknowledges that all payments to Offeror under any resulting Order shall be made by check or wire transfer to accounts with a recognized banking institution, that are owned and controlled by Offeror, and that no payment shall be made by cash or other negotiable instrument. Offeror agrees that its books and records relating to transactions pursuant to any resulting Order shall be subject to audit at reasonable times as necessary to ensure compliance with any Anti-Corruption Laws. Offeror further agrees that any failure by Offeror to comply with the terms of this paragraph shall give Buyer the immediate right to terminate any resulting subcontract upon notice to Offeror without further payment or obligation of Buyer to Offeror following or as a result of such termination.’

Representations, Certifications and other Statements of Offerors (U.S. Department of Energy) (October 2011), p.19:

‘Anti-Corruption Compliance.

Offeror represents and warrants to Buyer that:

(a) Offeror is familiar with the terms and provisions of and agrees to comply with the U.S. Foreign Corrupt Practices Act (the "FCPA") and any applicable international and local country anti-bribery and anti-corruption laws and regulations (the FCPA and such applicable international and local country laws and rules are individually and collectively referred to as “Anti-Corruption Laws”) and the purposes of such Anti-Corruption Laws.

(b) Offeror is familiar with, and agrees to comply with, the FCPA prohibition on the offering, authorization, payment or giving of anything of value, either directly or indirectly, to an official of a non-U.S. government or a public international organization, or any other person of similar authority for the purpose of (i) influencing any act or decision by that person in
his/her official capacity, (ii) inducing that person to do or omit any act in violation of his/her official capacity, (iii) inducing that person to influence an act or decision of the governmental or international organization in order to obtain or retain business for, or direct business to, any person, or (iv) to secure any improper advantage.

(c) Neither Offeror nor any of its employees, representatives and/or agents is an official, officer, employee or representative of any public international organization, government or political party or a candidate for political office.

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http://www.ga.com/websites/ga/docs/purchasing/EF-60.pdf
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 addresses the corruption risks associated with offset contracting.

References:
Public:
TI notes:
GOCA website: Regular Member Directory
General Atomics Aeronautical Systems (Aircraft Systems Group) is a member of GOCA
http://www.globaloffset.org/regularmembers.php
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 minimizes corruption risk when selecting its offset partners and brokers.

References:

Public:
TI notes:
GOCA website: Regular Member Directory
General Atomics Aeronautical Systems (Aircraft Systems Group) is a member of GOCA
http://www.globaloffset.org/regularmembers.php
A15:
Does the company have an anti-corruption policy that prohibits corruption in its various forms?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has an anti-corruption policy that prohibits corruption in its various forms.

References:
Public:
TI notes:
Company website: General Atomic Procurement
‘To explicitly prohibit the acceptance of gifts or favors from suppliers. We appreciate your refraining from offering them.’
http://www.ga.com/procurement
A16:
Is the anti-corruption policy explicitly one of zero tolerance?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has an anti-corruption policy that is explicitly one of zero tolerance.

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:
0

Comments:
Based on public information, there is no readily available evidence that the company's anti-corruption policy is easily accessible to Board members, employees, contracted staff and any other organisations acting with or on behalf of the company.

References:
Public:
NA
A17(a):
Is the company’s anti-corruption policy easily understandable and clear to Board members, employees and third parties?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company’s anti-corruption policy is easily understandable and clear to Board members, employees and third parties.

References:
Public:
NA
A18:

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

Score:

0

Comments:

Based on public information, there is no readily available evidence that the anti-corruption policy explicitly applies to all employees and members of the Board.

References:

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

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a policy on conflicts of interest.

References:
Public:
NA
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:
0

Comments:
Based on public information, there is no readily available evidence that the company has a policy that regulates the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery.

References:
Public:
TI notes:
Company website: General Atomic Procurement
'To explicitly prohibit the acceptance of gifts or favors from suppliers. We appreciate your refraining from offering them.'
http://www.ga.com/procurement
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:

0

Comments:
Based on public information, there is no readily available evidence that the company has a policy that regulates the giving and receipt of hospitality to ensure that such transactions are bona fide and not a subterfuge for bribery.

References:
Public:
TI notes:
Company website: General Atomic Procurement
‘To explicitly prohibit the acceptance of gifts or favors from suppliers. We appreciate your refraining from offering them.’
http://www.ga.com/procurement
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:

0

Comments:
Based on public information, there is no readily available evidence that the company prohibits or regulates political 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 it 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 or regulates charitable 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:

0

Comments:
Based on public information, there is no readily available evidence that the company provides written guidance to help Board members and employees understand and implement the ethics and anti-corruption agenda.

References:
Public:
NA
A27:
Does the company have a training programme that explicitly covers anti-corruption?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has a training programme that explicitly covers anti-corruption.

References:

Public:
NA
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:
NA
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:
0

Comments:
Based on public information, there is no readily available evidence that the company has a clear and formal process by which employees declare conflicts of interest.

References:
Public:
NA
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:

0

Comments:
Based on public information, there is no readily available evidence that the company has 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.

References:

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

Score:
0

Comments:
Based on public information, there is no readily available evidence that whistleblowing channels are available to all employees in all geographies.

References:
Public:
NA
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:

0

Comments:
Based on public information, there is no readily available evidence that the company has well-publicised resources available to all employees where help and advice can be sought on corruption-related issues.

References:
Public:
NA
A35:
Is there a commitment to non-retaliation for bona fide reporting of corruption?

Score:
0

Comments:
Based on public information, there is no readily available evidence of a commitment to non-retaliation for bona fide reporting of corruption.

References:
Public:
NA
Information Sources:

Company website:
www.ga.com

Terms And Conditions For Orders Issued Under Department Of Energy Contracts (December 2011):

Representations, Certifications And Other Statements Of Offerors Or Quoters (Department Of Defense) (September 2011):
http://www.ga.com/websites/ga/docs/purchasing/DF-60.pdf

Representations, Certifications and other Statements of Offerors (U.S. Department of Energy) (October 2011):
http://www.ga.com/websites/ga/docs/purchasing/EF-60.pdf