FINAL ASSESSMENT

ISRAEL AEROSPACE INDUSTRIES LTD

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>
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<td>Leadership, Governance and Organisation</td>
<td>10</td>
<td>55%</td>
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<td>Risk Management</td>
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<td>Company Policy and Codes</td>
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<td>Training</td>
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<td>Personnel and Helplines</td>
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<td>Total</td>
<td>41</td>
<td>62.2%</td>
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</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:

1

Comments:
Based on public information, there is evidence that the company published two statements from the Chairman and the President and CEO supporting the ethics and anti-corruption agenda of the company. The company therefore scores 1. To score higher the company would need to provide evidence of at least one more statement from the last two years, or one statement that specifically supports the company’s strong stance against corruption.

References:
Public:
Statement by Joseph (Yossi) Weiss, President and CEO (appointed June 2012):
‘As the President and CEO of IAI, I am committed to compliance, ethics and transparency, over-and-above complying with Israel’s export control regulations and laws. Therefore, I fully support the IAI Compliance Organization to proactively train and communicate values and standards of business conduct, for IAI.’
http://www.iai.co.il/Sip_Storage//FILES/5/39955.pdf

Statement by Rafi Maor, Chairman of the Board (appointed Nov 2013):
‘Both I and the other members of our Board of Directors view IAI’s ethical standing as being a substantial pillar of our very existence, and we actively ensure compliance with our Code of Ethics in order to promote IAI’s values and corporate business culture.’
http://www.iai.co.il/Sip_Storage//FILES/9/40709.pdf

Company website:
‘Via its Intra-net Compliance website, IAI publishes its zero-tolerance policy making clear its commitment to anti-corruption activities, and its applicability to all employees, including senior management and board members, with specific requirements where appropriate for relevant personnel.’
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:
1

Comments:
Based on public information, there is some evidence that the President and CEO demonstrate a personal, external facing commitment to the ethics and anti-corruption agenda of the company. The company therefore scores 1.

References:
Public:
Flight Global Article - An open and unusual statement about proper commercial standards (20 March 2014):
‘Joseph Weiss, the company’s president and CEO, signed a letter that was distributed as widely as possible.
It reads:
“To whom it may concern:
Israel Aerospace Industries (IAI) is committed to the continuous implementation and effective enforcement of its Anti-Bribery Compliance Program, and will act diligently in the event of suspicion of non-compliance or if defects in implementation are discovered.’
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:

1

Comments:
Based on public information, there is some evidence that the CEO demonstrates a strong, personal, internal-facing commitment to the ethics and anti-corruption agenda of the company. In his June 2012 inauguration speech, the CEO stated that the company will continue to enforce rigorous controls to prevent unethical behaviour. The company therefore scores 1. To score higher the company would need to provide at least two other examples of such personal engagement over the last two years.

References:
Public:
IAI and Business Ethics:
‘IAI's strict, no-exceptions policy was articulated in the inauguration speech given by IAI’s President & CEO, Joseph Weiss to IAI’s senior management on the occasion of his appointment in June 2012, where he stressed that IAI will continue during his tenure to enforce rigorous controls so as to prevent unethical behavior.’
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 values representing high standards of business conduct, including honesty, trust, transparency, openness, and integrity.

References:
Public:
Business Declaration of Intentions - Values:
‘The foundation of the success of Israel Aerospace Industries in its business dealings is based on integrity in its contacts with its customers, suppliers, competitors, Government authorities and, of course, with the employees of the Company.

A high level of ethical behavior has been and continues to be the foundation and basis for our Company and its activities worldwide.

Honesty, decency, credibility and suitable business conduct are important principles through which Israel Aircraft Industries manages its business dealings.’

Company website: IAI and Business Ethics
‘IAI also publishes a statement of the principles representing high standards of business conduct, including honesty, trust, transparency, openness, and integrity.’

Code of Ethics: The Values of the Code, Spirit and Vision:
‘We will be honest, fair and trustworthy in all IAI activities’
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 member of IFBEC. TI notes that the company is also a member of TRACE International and the Society of Corporate Compliance and Ethics (“SCCE”). By joining TRACE a company must provide a copy of its anti-bribery policy and sign a membership agreement confirming its commitment to complying with international anti-bribery laws. However, no evidence of the successful implementation of this policy is required by TRACE and membership of this organisation alone is not considered enough to merit a higher score here. Furthermore, there is no obligation to prove a commitment to anti-corruption by membership of SCCE.

References:

Public:
IFBEC Website:
http://ifbec.info/our-members/

IAI and Business Ethics:
‘IAI is also a member of the prestigious Trace International and Society of Corporate Compliance and Ethics (SCCE) organizations.’
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:
TI notes:
Summary Translation of the Anti-Corruption Compliance Manual (February 2014), p.1: ‘This document is a synopsized translation of material elements of IAI's Compliance Manual, adopted in Hebrew by IAI's Board of Directors in July 2011 and thereafter updated. The original Hebrew version (last update – 1 February 2014) is the official document.’

(p. 5): ‘1. Compliance Officer – Officer-level individual who reports directly to the CEO and who has the authorities and responsibilities set forth in this Compliance Program.’
‘12. Board Commission Committee – a committee appointed by the IAI Board of Directors comprised of at least 3 members.’

(p. 7): ‘Compliance Officer:
To present to the Board of Directors or the CEO his/her recommendations, from time to time and as needed, for minor or material changes (as applicable and in his/her discretion) required to modify and update this Compliance Program.’
‘To present to the Board of Directors or the CEO his/her recommendations, from time to time and as needed, for minor or material changes (as applicable and in his/her discretion) required to modify and update this Compliance Program.’

2. Board Commissions Committee
   • The Board Commissions Committee shall convene annually in order to approve a general framework, and at such other times as needed upon the request of the CEO.
   • The VP-Marketing shall present to the Board Commissions Committee the company's annual marketing plan, and will make recommendations regarding suitable Commissions based thereon. The Board Commissions Committee will establish and approve a framework of Commissions, based on the marketing plan presented to it.
   • The VP-Marketing will also report to the Board Commissions Committee on the actual payment of Commissions.

3. The CEO has the following responsibilities:
   • To determine the Commission for particular transactions, within the general framework determined by the Board Commissions Committee.
   • The authority to approve deviations from the framework of Commissions approved by the Board Commission Committee (jointly with the Chairman or the Board Commission Committee, as applicable).
   • The authority to approve engagement of a Marketing Consultant and to sign the agreement with it (jointly with the VP-Finance).’

http://www.iai.co.il/sip_storage/FILES/0/40950.pdf
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:

2

Comments:
Based on public information, there is evidence that the company has appointed the Chief Compliance Officer with responsibility for implementing the company’s ethics and anti-corruption agenda, and who has a direct reporting line to the Board. This individual is named as Itzhak Sharon.

References:
Public:
Company Website:
‘[I]n July 2011, as a measure of their commitment, IAI's Board of Directors appointed Mr. Itzhak Sharon as the Chief Compliance Officer.’

‘Itzhak Sharon, a highly-experienced senior manager in the IAI was appointed in July 2011 to the post of Chief Compliance Officer, and is responsible for implementing the company's program, reporting directly to the Board.’

Anti-Bribery Compliance Manual (February 2014):
http://www.iai.co.il/Sip_Storage//FILES/0/40950.pdf
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 monitoring and review of the performance of the company’s ethics and anti-corruption agenda by the Compliance Officer who reports directly to the Board. However, TI notes that it is not clear how regularly this happens and to what extent the Board is involved in the process. The company therefore scores 1.

References:

Public:
IAI and Business Ethics:
‘IAI’s senior management regularly monitors and reviews performance of the Compliance program, reviewing and updating its policies and practices as appropriate.’

Anti-Bribery Compliance Manual (February 2014), pp.7-8:
‘The Compliance Officer has the following responsibilities:

... To establish, in accordance with his/her discretion, processes for follow-up and monitoring in order to ensure compliance with this program.

• To present to the Board of Directors or the CEO his/her recommendations, from time to time and as needed, for minor or material changes (as applicable and in his/her discretion) required to modify and update this Compliance Program.

To centralize management of the following documents:

i. Due diligence results;

ii. Verification of employee training;

iii. Copies of certifications by employees dealing with Marketing Consultants;

iv. Verification of extraordinary entertainment expenses;

v. Documentation of complaints relating to violation of this Compliance Program and follow-
vi. Copies of certifications by BT relating to not making donations and not providing gifts in violation of policy.’

http://www.iai.co.il/Sip_Storage//FILES/0/40950.pdf
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:

1

Comments:
Based on public information, there is some evidence of a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda is based. Although the company states that policies and practices are updated as appropriate, no evidence of improvement plans being implemented was found. The company therefore scores 1.

References:
Public:
IAI and Business Ethics:
‘IAI's senior management regularly monitors and reviews performance of the Compliance program, reviewing and updating its policies and practices as appropriate.’

Anti-Bribery Compliance Manual (February 2014), pp.7-8:
‘The Compliance Officer has the following responsibilities:
... To establish, in accordance with his/her discretion, processes for follow-up and monitoring in order to ensure compliance with this program.
• To present to the Board of Directors or the CEO his/her recommendations, from time to time and as needed, for minor or material changes (as applicable and in his/her discretion) required to modify and update this Compliance Program.

To centralize management of the following documents:
i. Due diligence results;
ii. Verification of employee training;
iii. Copies of certifications by employees dealing with Marketing Consultants;
iv. Verification of extraordinary entertainment expenses;
v. Documentation of complaints relating to violation of this Compliance Program and follow-up;
vi. Copies of certifications by BT relating to not making donations and not providing gifts in violation of policy.

http://www.iai.co.il/Sip_Storage//FILES/0/40950.pdf
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 there is a formal process for review and update in response to actual or alleged instances of corruption. The senior management review is understood to be reasonably regular but it is not evident what happens in terms of review when there is actual or alleged malpractice.

References:
Public:
TI notes:
IAI and Business Ethics:
‘IAI's senior management regularly monitors and reviews performance of the Compliance program, reviewing and updating its policies and practices as appropriate.’
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:

1

Comments:
Based on public information, there is evidence that the company has a formal anti-corruption risk assessment procedure for assessing proposed business decisions. However, no information is provided regarding this risk assessment process beyond the statement of its existence and it is unclear how this is applied. The company therefore scores 1.

References:
Public:
IAI and Business Ethics:
‘IAI has a formal anti-corruption risk assessment procedure for assessing business decisions, with clear requirements on the circumstances under which this should be applied as part of its ongoing due diligence procedures, used to guard against corruption risk when selecting its marketing consultants.’
A11: Does the company conduct due diligence that minimises corruption risk when selecting or reappointing its agents?

Score: 2

Comments: Based on public information, there is evidence that the company conducts due diligence when selecting its ‘marketing consultants’ (agents) and that this is renewed at least every 2 years.

References:
Public:
IAI and Business Ethics:
‘In addition, the Compliance Office has conducted due diligence investigations and made risk assessments relating to the proposed engagement of actual and potential marketing consultants.’

‘IAI has a formal anti-corruption risk assessment procedure for assessing business decisions, with clear requirements on the circumstances under which this should be applied as part of its ongoing due diligence procedures, used to guard against corruption risk when selecting its marketing consultants.’

Anti-Bribery Compliance Manual (February 2014), p.6:
‘Marketing Consultant – A person, company or entity (excluding a foreign public official as defined in Section 91a of the Penal Law) who supports IAI in marketing IAI's products and services to specified customers and who meets the following criteria:
a. Generally present physically in the target territory;
b. Acts as intermediary between IAI and the customer but is not authorized to act as IAI’s agent’

(p.9): ‘Authorized Individuals have the following responsibilities:'
To conduct due diligence of Marketing Consultant candidates and upon extension of validity and/or renewal of existing contracts with Marketing Consultants, as directed by the VP-Marketing and in accordance with Chapter 5.

(p.10): ‘To ensure that the applicable Authorized Individuals completed due diligence:
- on Marketing Consultant candidates – by the Authorized Individual;
- to a Marketing Consultant – every two (2) years, or within any other period of time requested by the Compliance Officer.
- to a Marketing Consultant – upon extension of validity and/or renewal of existing contracts, shall sign Representations form and Compliance Certification form, all in accordance with Exhibit B’

(p.19): ‘The term of the engagement of a Marketing Consultant will be one year, unless, following analysis of risks in the relevant country, the Vice President-Marketing and Compliance Officer have agreed on a longer term not to exceed two years.’

http://www.iai.co.il/Sip_Storage//FILES/0/40950.pdf
A12:
Does the company have contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption?

Score:
2

Comments:
Based on public information, there is evidence that the company has contractual rights and processes for the monitoring, control and audit of ‘marketing consultants’ (agents) with respect to countering corruption. There is an extensive monitoring process in place that includes template contracts and senior approval of signing contracts, their renewal and possible termination.

References:
Public:
Summary Translation of Anti-Bribery Compliance Manual (February 2014), p.3:
‘Furthermore, in accordance with IAI’s policies and procedures, IAI’s managers and workers are committed to the highest standards in various areas, including accounting controls and accurate document management, with the purpose of avoiding improper payments or in-kind transactions for the goal of obtaining unfair advantage in the company's business, including, among others, the following:
a. Marketing Consultants – In the course of marketing IAI's products and services internationally, the company engages marketing consultants as needed. IAI diligently ensures that the retention and activation of marketing consultants complies with its policies to prevent corruption. Therefore, IAI conducts thorough, centralized oversight of all aspects of these activities, including early evaluation of candidates considered for marketing consultants, meetings and negotiations with such candidates, etc., under the auspices of its Vice President-Marketing and its Compliance Officer. Details are set forth in Article 5 of the Compliance Program.’

(p.4):
’d. Procurement of Expert Services – IAI has periodic requirement to engage experts to
provide specialized services, including with respect to international marketing. The engagement of such experts must comply with this Compliance Program and may occur only when and as needed, i.e., when the services cannot be obtained from IAI's employees and internal resources and when it is not practicable for the company to hire such expert as an employee. The engagement of such experts shall not create an employer-employee relationship and such experts may not become part of IAI's corporate hierarchy nor may they supervise IAI's employees. Similarly, such experts may not represent IAI to third parties, unless specifically authorized by IAI at the level of Division General Manager or higher and in early coordination with the Vice President – Human Resources or with the Director of Employment. The engagement of such experts shall not exceed 24 months and shall be in accordance with standard terms and conditions prepared in coordination with the IAI Legal Department, and payment shall be made in accordance with invoices submitted pursuant to such terms and conditions. Details of these procedures are set forth in IAI Policy 511.01.10.’

‘e. Procurement Representatives – In the course of its business activities, IAI sometimes has the need to purchase in overseas markets unique products (typically some kind of platform) that are integral to a project being sold to an IAI customer. When IAI is not able to purchase such products directly, the company may engage a "Procurement Representative" to assist in the transaction. The Purchaser Representative is not the manufacturer of the product or an employee of the manufacturer, and is compensated by IAI. As a matter of policy, IAI strives to limit the use of Procurement Representatives solely to situations where needed and in accordance with the procedures set forth in Article 6 of the Compliance Program. In order to ensure that the engagement and activation of Procurement Representatives is done in accordance with the Compliance Program, appropriate oversight is conducted by the Corporate Marketing Department (via the Marketing Consultant Department due to its tools and experience in similar oversight of Marketing Consultants), in the Corporate Procurement and Logistics Department, and by the Compliance Officer. Details of these procedures are set forth in IAI Policy 921.01.07.

f. Distributors/Marketing Intermediaries – IAI occasionally uses distributors/intermediaries ("Distributors") in its marketing efforts. In order to ensure that engagement of Distributors complies with the company’s policies and the directives of this Compliance Program, IAI conducts centralized oversight of such engagements via its Marketing Consultant Department and the Compliance Office. Further details are provided in Policy 423.01.02.’

(pp.9-10):

‘6. The IAI Legal Department is responsible for the following:
• To draft the standard contract terms with Marketing Consultants.
• To draft the mandatory clauses to be applied in all contracts with Marketing Consultants, as set forth in Exhibit A.
• To draft updates of and modifications to this Compliance Program.
• To issue legal opinions with respect to all matters relating to the engagement of Marketing Consultants, as needed.

7. The Marketing Consultant Department has the following responsibilities:
• To centralize all requests for appointment of Marketing Consultants
• To ensure receipt of all approvals by the Ministry of Defense ("MOD") (AP"I) and the IAI Security Department required for appointment of Marketing Consultants.
• To ensure that the applicable Authorized Individuals completed due diligence:
  o on Marketing Consultant candidates – by the Authorized Individual;
  o to a Marketing Consultant – every two (2) years, or within any other period of time requested by the Compliance Officer.
  o to a Marketing Consultant - upon extension of validity and/or renewal of existing contracts, shall sign Representations form and Compliance Certification form, all in accordance with Exhibit B
• To issue contracts with Marketing Consultants based on the format approved by the Legal Department.
• To negotiate the contract terms (other than Commissions) with Marketing Consultant candidates in coordination with the Authorized Negotiator and with the support of the Legal Department and the Corporate Finance Department (as needed).
• To maintain contact with the designated authorities in the MOD relating to Marketing Consultants.
• To issue notices to the business units of pending expiration of contract term with Marketing Consultants.
• To compile for the VP-Marketing (and for IAI management, as needed) information required for the appointment of a Marketing Consultant or renewal/termination/expansion/reduction of its contract.
• To maintain a current repository of contracts with Marketing Consultants and to issue reports regarding Marketing Consultants solely as requested by authorized persons (Compliance Officer, Marketing Directors and BT) within their domain.
• To advise IAI's divisions and management regarding the appointment of Marketing Consultants.
• To issue periodic reports to the MOD and to the Board Commissions Committee.
• The chief of the Marketing Consultant Department acts as secretary of the
Management Commissions Committee, with the following duties:
i. Receive requests for approval of Commissions, and administration of follow-up.’
(p. 11):
9. The Vice President – Marketing has the following responsibilities:
• To recommend to the Management Commissions Committee the engagement of new Marketing Consultants and the terms of engagement, and changes to existing terms of engagement.
• To approve the extension of expansion of agreements with Marketing Consultants without increasing Commissions approved within the past 5 years by the Management Commissions Committee.
• To direct at any time the termination of any agreement with a Marketing Consultant.’

IAI and Business Ethics:
‘IAI has contractual arrangements and processes in place at Corporate level for the monitoring, control and audit of marketing consultants. IAI also makes clear to all its contractors, sub-contractors, consultants, representatives and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance.’
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 contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance. However, there is no readily available evidence of such contractual terms. The company therefore scores 1.

References:
Public:
IAI and Business Ethics:
‘IAI also makes clear to all its contractors, sub-contractors, consultants, representatives and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance.

Terms and Conditions for Acquisition (May 2014), p.20:
‘Ethical Code
The Supplier is aware that the Customer has an ethical code, to be found on the Customer’s website at: http://www.iai.co.il (URL), and the Customer expects the Supplier to act in the spirit of the aforementioned ethical code.’
http://www.iai.co.il/Sip_Storage//FILES/9/40949.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 explicitly addresses the corruption risks associated with offset contracting.

References:
Public:
TI notes:
Evidence of the company’s involvement in offset contracting:
http://www.maxaerospace.com/aviation/industrial_offsets_partners.htm
A13(b):
Does the company conduct due diligence that minimises corruption risk when selecting its offset partners and offset brokers?

Score:

2

Comments:
Based on public information, there is evidence that the company conducts due diligence that minimises corruption risk when selecting its offset partners and offset brokers, and that this is refreshed at least every 2 years.

References:
Public:
Evidence of the company’s involvement in offset contracting:
http://www.maxaerospace.com/aviation/industrial_offsets_partners.htm

Anti-Bribery Compliance Manual (February 2014), p.6:
‘In addition, an offset consultant or broker, who arranges procurement on behalf of IAI by other companies from local companies in satisfaction of IAI’s offset requirements and who assists IAI in obtaining related offset credits from the local government, shall be treated as a Marketing Consultant.’

(p.9): ‘Authorized Individuals have the following responsibilities:
• To conduct due diligence of Marketing Consultant candidates and upon extension of validity and/or renewal of existing contracts with Marketing Consultants, as directed by the VP-Marketing and in accordance with Chapter 5.’

(p.10): ‘To ensure that the applicable Authorized Individuals completed due diligence:
o on Marketing Consultant candidates – by the Authorized Individual;
o to a Marketing Consultant – every two (2) years, or within any other period of time requested by the Compliance Officer.
o to a Marketing Consultant - upon extension of validity and/or renewal of existing contracts, shall sign Representations form and Compliance
(p.19): ‘The term of the engagement of a Marketing Consultant will be one year, unless, following analysis of risks in the relevant country, the Vice President-Marketing and Compliance Officer have agreed on a longer term not to exceed two years.’

http://www.iai.co.il/Sip_Storage//FILES/0/40950.pdf
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-Bribery Compliance Program’. However, the company is not explicit on all the forms that corruption might take. TI further notes the limited focus of the programme on ‘combating corruption and bribery of foreign officials in international transactions’. The company therefore scores 1.

References:  
Public:  
IAI and Business Ethics:  
‘IAI has in place a robust Anti-Bribery Compliance Program since July 2011.’

This is also variously called the company’s ‘anti-corruption policy’, ‘zero-tolerance policy’ and ‘no-exceptions policy’.  

Anti-Bribery Compliance Manual (February 2014), p.2:  
‘This program consolidates and specifies a compliance program the purpose of which is to incorporate IAI and its subsidiaries into the framework for combating corruption and bribery of foreign officials in international transactions,’  
http://www.iai.co.il/Sip_Storage//FILES/0/40950.pdf
A16: Is the anti-corruption policy explicitly one of zero tolerance?

Score: 2

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

References:

Public:

IAI and Business Ethics:
‘IAI's strict, no-excptions policy was articulated in the inauguration speech given by IAI's President & CEO, Joseph Weiss to IAI’s senior management on the occasion of his appointment in June 2012, where he stressed that IAI will continue during his tenure to enforce rigorous controls so as to prevent unethical behavior.’

‘Via its Intra-net Compliance website, IAI publishes its zero-tolerance policy making clear its commitment to anti-corruption activities, and its applicability to all employees, including senior management and board members, with specific requirements where appropriate for relevant personnel.

The company's anti-corruption policy is easily accessible to employees via the company's intranet, and is being made available to other connected staff via IAI's external internet site.’

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 easily accessible to Board members, contracted staff and other connected staff.

References:
Public:
IAI and Business Ethics:
‘Via its Intra-net Compliance website, IAI publishes its zero-tolerance policy making clear its commitment to anti-corruption activities, and its applicability to all employees, including senior management and board members, with specific requirements where appropriate for relevant personnel.
The company’s anti-corruption policy is easily accessible to employees via the company’s intranet, and is being made available to other connected staff via IAI’s external internet site.’

Code of Ethics:
http://www.iai.co.il/Sip_Storage//FILES/1/40391.pdf

Anti-Bribery Compliance Manual (February 2014):
http://www.iai.co.il/Sip_Storage//FILES/0/40950.pdf
A17(a):
Is the company’s anti-corruption policy easily understandable and clear to Board members, employees and third parties?

Score:

1

Comments:
Based on public information, there is some evidence that the company’s anti-corruption policy is understandable and clear to Board members, employees and third parties. However, TI notes the legalistic language of some of the documents. The company therefore scores 1.

References:
Public:
IAI and Business Ethics:
‘Via its Intra-net Compliance website, IAI publishes its zero-tolerance policy making clear its commitment to anti-corruption activities, and its applicability to all employees, including senior management and board members, with specific requirements where appropriate for relevant personnel.
The company's anti-corruption policy is easily accessible to employees via the company's intranet, and is being made available to other connected staff via IAI's external internet site.’

Code of Ethics:
http://www.iai.co.il/Sip_Storage//FILES/1/40391.pdf

Anti-Bribery Compliance Manual (February 2014):
http://www.iai.co.il/Sip_Storage//FILES/0/40950.pdf
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 applies to all employees and members of the Board.

References:

Public:
Business Code Declaration of Intentions – General:
‘Every employee of the Company is obligated to ensure to uphold the detailed guidelines in the Code of Business Conduct.’

IAI and Business Ethics:
‘Via its Intra-net Compliance website, IAI publishes its zero-tolerance policy making clear its commitment to anti-corruption activities, and its applicability to all employees, including senior management and board members, with specific requirements where appropriate for relevant personnel.’

Code of Ethics:
The Code applies to all IAI levels - including directors, managers, employees and representatives, in Israel and abroad. The Code is also intended for suppliers who work with IAI.

‘The updated IAI Code of Ethics will apply to IAI and any person chosen to represent IAI. IAI subsidiaries’ BOD around the world will adopt the Code and make the changes needed. The Code of Ethics expresses the basic values which will be the overall framework for determining the conduct of IAI and its employees.’
'The Code of Ethics applies to the entire board, managers, employees, consultants and every person chosen to represent IAI.'

http://www.iai.co.il/sip_storage/FILES/1/40391.pdf
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 and that it applies to both employees and board members. The company also indicates what a conflict of interest might consist of, namely a conflicting business interest. The policy also covers conflicts of interest pertaining to suppliers and contractors.

References:
Public:
IAI and Business Ethics:
‘IAI has a clear policy on potential conflicts of interest, which applies to both employees and board members.’

Code of Ethics:
‘Refraining from Conflict of Interests with IAI Suppliers and Contractors
IAI employees will refrain from any situation which has a direct or indirect conflict of interests between their private matters and the business/activity of IAI.
A supplier/contractor will refrain from any situation which has a direct and/or indirect conflict of interest between its private business and the business/activity of IAI.
A supplier/contractor will notify an accredited IAI representative in writing, immediately any time an aforementioned conflict of interest exists and/or there is concern that one existed and will act according to IAI regulations on this issue.
A supplier/contractor or a person on his behalf will not provide, directly and/or indirectly, a person employed by IAI, by a corporation and/or by another party connected to a person employed by IAI, with fees, benefits, and/or any compensation of any kind (which is not part of the agreement).
A supplier/contractor will notify an accredited IAI representative in writing, regarding all
contracts between himself and any person, corporation and/or other party, on the subject of giving consulting fees and/or fees and/or any compensation of any kind concerning the consultation and/or mediation, regarding winning an agreement and/or carrying out an agreement and/or the process of presenting proposals to IAI, prior to the contractual agreement and/or presenting an offer to IAI, whichever is earliest, and will provide IAI with details of this contractual obligation as needed.’

‘General
Directors, managers and IAI employees and all those who represent the company must be loyal to IAI and refrain from contacts with parties outside IAI which create a conflict of interests.
It is prohibited to accept benefits, to improperly use inside information for personal gain, to accept gifts and to be involved in any business activity which will create a conflict of interests.

Conflict of interests
IAI employees will refrain from connections and other activities which could cause a conflict of interests between their jobs in IAI and their personal matters (their own and/or their relatives).
IAI prohibits personal business activity with a competitive business entity, or with any client or supplier, if that activity could cause the employee a conflict of interests between his job and IAI.’

http://www.iai.co.il/sip_storage/FILES/1/40391.pdf
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, it does not publish evidence of upper limits or a specific threshold necessary for senior authorisation. The company therefore scores 1.

References:
Public:
IAI and Business Ethics:
‘IAI deals specifically with the giving and receipt of gifts and hospitality to ensure that such interactions are not corrupt.’

Code of Ethics: ‘Gifts
IAI does not permit its employees to accept gifts or any other items of monetary value from customers and suppliers, beyond what is defined in its regulations.
IAI permits accepting standard, low-value promotional products carrying the providing company’s name and logo.
IAI permits accepting gifts of reasonable value from persons outside of IAI on occasions celebrated by the employee or his relatives.
IAI permits its employees to receive prizes from persons outside of IAI who recognize its employees, if the prize is in conjunction with their work at IAI and has a reasonable value.
IAI permits giving gifts to persons outside of IAI according to its regulations.’

‘Prohibition of Accepting Benefits
IAI prohibits its employees from accepting, directly or indirectly, benefits from foreign parties, in connection to performing their job at IAI, or in compensation for their work at IAI,
or if it could influence their job fulfillment.

IAI prohibits a manager from accepting benefits from a subordinate employee, directly or indirectly, in a way that could influence the manager’s opinion.’
http://www.iai.co.il/sip_storage/FILES/1/40391.pdf

Anti-Bribery Compliance Manual (February 2014):
http://www.iai.co.il/Sip_Storage//FILES/0/40950.pdf
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 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. However, it does not publish evidence of upper limits or a specific threshold necessary for senior authorisation. Indeed, aside from an initial statement highlighting hospitality, the term is not mentioned specifically again. The company therefore scores 1.

References:
Public:
IAI and Business Ethics:
‘IAI deals specifically with the giving and receipt of gifts and hospitality to ensure that such interactions are not corrupt.’

Code of Ethics: ‘Gifts
IAI permits its employees to receive prizes from persons outside of IAI who recognize its employees, if the prize is in conjunction with their work at IAI and has a reasonable value.’
‘Prohibition of Accepting Benefits
IAI prohibits its employees from accepting, directly or indirectly, benefits from foreign parties, in connection to performing their job at IAI, or in compensation for their work at IAI, or if it could influence their job fulfillment.
IAI prohibits a manager from accepting benefits from a subordinate employee, directly or indirectly, in a way that could influence the manager’s opinion’
http://www.iai.co.il/sip_storage/FILES/1/40391.pdf
A23:

Does the company have a policy that explicitly prohibits facilitation payments?

Score:

1

Comments:

Based on public information, there is evidence that the company has a policy that explicitly prohibits facilitation payments. However, the company provides no guidance or supplementary information on how the policy is to be implemented in practice. The company therefore scores 1.

References:

Public:

IAI and Business Ethics:

‘IAI also has clear rules prohibiting facilitation payments or requiring the recording of payments if they are made, as well as prohibiting political contributions, and is clear as to engaging in lobbying activities, to prevent undue influence or other corrupt intent.’

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 is prohibited from making political contributions.

References:
Public:
IAI and Business Ethics:
‘IAI also has clear rules prohibiting facilitation payments or requiring the recording of payments if they are made, as well as prohibiting political contributions, and is clear as to engaging in lobbying activities, to prevent undue influence or other corrupt intent.’

Anti-Bribery Compliance Manual (February 2014), p.4:
‘c. Donations – In order to prevent a situation whereby government companies obtain improper advantage in their businesses, the Israel Government Companies Authority prohibits IAI and its subsidiaries from making donations to third parties for any purpose, with the exception of providing services that do not have material value in accordance with IAI’s policies. Accordingly, IAI has adopted Policy 100.01.04, which provides further details on this subject.’
http://www.iai.co.il/Sip_Storage//FILES/0/40950.pdf
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 insufficient evidence that the company has a clear policy on regulating lobbying activities, in order to prevent undue influence or other corrupt intent. To score higher, the company would need to provide evidence of an authorisation process or other controls around this activity. The company therefore scores 0.

References:
Public:
TI notes:
IAI and Business Ethics:
‘IAI also has clear rules prohibiting facilitation payments or requiring the recording of payments if they are made, as well as prohibiting political contributions, and is clear as to engaging in lobbying activities, to prevent undue influence or other corrupt intent.’

Code of Ethics:
‘Political Involvement
IAI forbids conducting political activity on IAI premises or to use facilities and resources for promoting political issues. This does not forbid the involvement of IAI employees in personal political activities, after work hours and off IAI grounds.’
http://www.iai.co.il/sip_storage/FILES/1/40391.pdf
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 is prohibited from making charitable contributions to prevent undue influence or other corrupt intent.

References:

Public:
Code of Ethics:
‘Community Contribution
IAI will encourage its employees and its union to assist the community and contribute to it.’
http://www.iai.co.il/sip_storage/FILES/1/40391.pdf

Anti-Bribery Compliance Manual (February 2014), p.4:
‘c. Donations – In order to prevent a situation whereby government companies obtain improper advantage in their businesses, the Israel Government Companies Authority prohibits IAI and its subsidiaries from making donations to third parties for any purpose, with the exception of providing services that do not have material value in accordance with IAI’s policies. Accordingly, IAI has adopted Policy 100.01.04, which provides further details on this subject.’
http://www.iai.co.il/Sip_Storage//FILES/0/40950.pdf
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 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 guidance is limited in some cases and is weakened by a lack of illustration and scenarios. The company therefore scores 1.

References:

Public:
Business Code Declaration of Intentions – General:
‘Israel Aerospace Industries Ltd. (IAI) has devised principles which form the Code of Business Conduct. In addition to the principles and directives that are listed in the Company's procedures and in various guidelines, IAI has a "Code of Business Conduct" which is written and published. This document comprises principles and guidelines relating to the business conduct of the Company and its employees.’


IAI and Business Ethics:
‘IAI provides written guidance and both face-to-face and e-learning training programs to help employees understand and implement its anti-corruption and compliance program.’


IAI Code of Ethics:

http://www.iai.co.il/sip_storage/FILES/1/40391.pdf

Anti-Bribery Compliance Manual (February 2014):

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

Score:

2

Comments:
Based on public information, there is evidence that the company has a training programme on its anti-corruption and compliance programme.

References:
IAI and Business Ethics:
‘IAI provides written guidance and both face-to-face and e-learning training programs to help employees understand and implement its anti-corruption and compliance program.’

Statement by Chief Compliance Officer:
‘IAI has implemented a company-wide program of face-to-face and e-learning, training and assisting personnel based on their job function, to effectively communicate IAI's compliance guidelines and policies.’
http://www.iai.co.il/sip_storage/FILES/6/39956.pdf

Statement by Chairman of the Board:
‘Our employees are continuously trained and re-trained to act appropriately, whether in respect of customers or suppliers, including not giving or receiving gifts in violation of applicable laws.’
http://www.iai.co.il/sip_storage/FILES/9/40709.pdf

Anti-Bribery Compliance Manual (February 2014):
http://www.iai.co.il/Sip_Storage//FILES/0/40950.pdf
A28:
Is anti-corruption training provided in all countries where the company operates or has company sites?

Score:
2

Comments:
Based on public information, there is evidence that the company provides training on its anti-corruption and compliance programme in all of the geographic areas where the company operates.

References:
Public:
IAI and Business Ethics:
‘IAI provides written guidance and both face-to-face and e-learning training programs to help employees understand and implement its anti-corruption and compliance program. This includes training in all of those geographic areas where IAI operates. Such training also deals specifically with employees in sensitive positions, as well as for senior management and board members.’

Statement by Chief Compliance Officer:
‘IAI has implemented a company-wide program of face-to-face and e-learning, training and assisting personnel based on their job function, to effectively communicate IAI's compliance guidelines and policies.’
http://www.iai.co.il/sip_storage/FILES/6/39956.pdf
A29:
Does the company provide targeted anti-corruption training to members of the Board?

Score:

1

Comments:
Based on public information, there is evidence that the company provides training on the company’s anti-corruption and compliance programme to the Board. However, there is no readily available evidence that the Board are re-trained at least every three years. The company therefore scores 1.

References:
Public:
IAI and Business Ethics:
‘IAI provides written guidance and both face-to-face and e-learning training programs to help employees understand and implement its anti-corruption and compliance program. This includes training in all of those geographic areas where IAI operates. Such training also deals specifically with employees in sensitive positions, as well as for senior management and board members.’
A30:

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

Score:

2

Comments:

Based on public information, there is evidence that the company provides training on the company’s anti-corruption and compliance programme to employees in sensitive positions.

References:

Public:
IAI and Business Ethics:
‘IAI provides written guidance and both face-to-face and e-learning training programs to help employees understand and implement its anti-corruption and compliance program. This includes training in all of those geographic areas where IAI operates. Such training also deals specifically with employees in sensitive positions, as well as for senior management and board members.’

Anti-Bribery Compliance Manual (February 2014), p.13:
‘Chapter C Training
1. The Compliance Officer, in cooperation and coordination with Mahut and Maman facilities, will construct a training and study program that will include a computerized teaching method (E-Learning) that will be adapted to the levels/ groups of target groups in the company, as follows:
   a. Basic program – designed for IAI employees who in their official capacities have working relations with outside entities. A list of the employees will be defined by the Compliance Officer, in coordination with the VP of Marketing. The implementation of the computerized training will be supervised by Maman and its implementation will be supervised by every of the relevant employees.
   b. Accelerated program – designed for BT level management, for members of the Board of Directors, marketers, persons authorized to meet, persons authorized to negotiate, representatives of the Legal Department, employees of the Marketing Promoters
Administration, employees of the Compliance Officer’s Office, Regional Marketing Managers, relevant employees (Israeli) of the IAI marketing representative offices overseas, marketing managers of IAI units, relevant employees in the Procurement Organization in the company units and relevant employees in the CFO’s organization. Each of the participants in the accelerated program will sign at the end of the training the declaration and undertaking form enclosed as annex D below, confirming that they have read this document, went through the training program, understood all of the instructions and obligations imposed upon them and undertake to follow them.

c. Special program – special training for the Compliance Officer’s staff that includes, among other things, participation in conferences and seminars on the subject.

d. Program for marketing promoters – a special program for marketing promoters operating in high risk countries, and in special cases for promoters, according to the Compliance Officer’s discretion. This training program will be implemented through E-Learning and/or by sending written materials and/or face to face training and/or any other way that will be reviewed by the Compliance Officer.’

http://www.iai.co.il/Sip_Storage//FILES/0/40950.pdf
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 in writing either to a manager or an independent department. TI notes that the company Code of Ethics indicates a formal process for suppliers and contractors to declare conflicts of interest.

References:
Public:

TI notes:

IAI and Business Ethics:
‘IAI has implemented a clear and formal process by which employees can declare conflicts of interest, and is explicit in its commitment to apply disciplinary procedures to employees found to have engaged in corrupt activities.’

Code of Ethics:
‘Conflict of interests
IAI employees will refrain from connections and other activities which could cause a conflict of interests between their jobs in IAI and their personal matters (their own and/or their relatives).
IAI prohibits personal business activity with a competitive business entity, or with any client or supplier, if that activity could cause the employee a conflict of interests between his job and IAI.’

‘Refraining from Conflict of Interests with IAI Suppliers and Contractors
IAI employees will refrain from any situation which has a direct or indirect conflict of interests between their private matters and the business/activity of IAI.
A supplier/contractor will refrain from any situation which has a direct and/or indirect
conflict of interest between its private business and the business/activity of IAI.

A supplier/contractor will notify an accredited IAI representative in writing, immediately any
time an aforementioned conflict of interest exists and/or there is concern that one existed
and will act according to IAI regulations on this issue.

A supplier/contractor or a person on his behalf will not provide, directly and/or indirectly, a
person employed by IAI, by a corporation and/or by another party connected to a person
employed by IAI, with fees, benefits, and/or any compensation of any kind (which is not part
of the agreement).

A supplier/contractor will notify an accredited IAI representative in writing, regarding all
contracts between himself and any person, corporation and/or other party, on the subject
of giving consulting fees and/or fees and/or any compensation of any kind concerning the
consultation and/or mediation, regarding winning an agreement and/or carrying out an
agreement and/or the process of presenting proposals to IAI, prior to the contractual
agreement and/or presenting an offer to IAI, whichever is earliest, and will provide IAI with
details of this contractual obligation as needed.’

http://www.iai.co.il/sip_storage/FILES/1/40391.pdf
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:

2

Comments:
Based on public information, there is evidence that the company is explicit in its commitment to apply disciplinary procedures to employees found to have engaged in corrupt activities. The company policies apply also to directors and managers.

References:

Public:
Code of Ethics:
The Code applies to all IAI levels - including directors, managers, employees and representatives, in Israel and abroad. The Code is also intended for suppliers who work with IAI.

‘The updated IAI Code of Ethics will apply to IAI and any person chosen to represent IAI. IAI subsidiaries’ BOD around the world will adopt the Code and make the changes needed. The Code of Ethics expresses the basic values which will be the overall framework for determining the conduct of IAI and its employees.’

‘The Code of Ethics applies to the entire board, managers, employees, consultants and every person chosen to represent IAI.’
http://www.iai.co.il/sip_storage/FILES/1/40391.pdf

IAI and Business Ethics:
‘IAI has implemented a clear and formal process by which employees can declare conflicts of interest, and is explicit in its commitment to apply disciplinary procedures to employees found to have engaged in corrupt activities.’
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 the company has at least one communication channel (an anonymous 24 hour hotline) to report concerns or instances of suspected corrupt activity. Employees are also encouraged to seek help and advice from the Chief Compliance Officer and his staff. However, the hotline does not appear to be particularly well publicised and there are no independent sources to report to. The company therefore scores 1.

References:
Public:
IAI and Business Ethics:
‘The company also has well-publicized communication channels [internal, at this stage], namely an anonymous 24/7 hotline, with a commitment for no retaliation. Through this, any employee can report suspected instances of corrupt activities.
IAI employees are also encouraged and able to seek help and advice on corruption-related issues from the Compliance Officer and his staff.’
A33(a):
Are the whistleblowing channels available to all employees in all geographies?

Score:
1

Comments:
Based on public information, there is evidence that the company has at least one channel (an anonymous 24 hour telephone hotline) available for all employees across geographies to contact. However, for employees without access to the Chief Compliance Officer and his staff there only appears to be access to this one channel. The company therefore scores 1.

References:
Public:
IAI and Business Ethics:
‘The company also has well-publicized communication channels [internal, at this stage], namely an anonymous 24/7 hotline, with a commitment for no retaliation. Through this, any employee can report suspected instances of corrupt activities.’
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 evidence that the company has formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, or that whistleblowers are treated supportively. Such mechanisms could include detailed analysis of whistleblowing data, independent employee surveys or evidence of follow up with individual whistleblowers.

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:
2

Comments:
Based on public information, there is evidence that the company has resources available to employees where help and advice can be sought on corruption-related issues. This includes access to the Chief Compliance Officer and his staff, as well as access to an anonymous 24 hour hotline.

References:
Public:
IAI and Business Ethics:
‘In addition, in July 2011, as a measure of their commitment, IAI’s Board of Directors appointed Mr. Itzhak Sharon as the Chief Compliance Officer. Since then, Mr. Sharon and his staff make a continuous effort to implement the Compliance Program within IAI.’

‘The company also has well-publicized communication channels [internal, at this stage], namely an anonymous 24/7 hotline, with a commitment for no retaliation. Through this, any employee can report suspected instances of corrupt activities. IAI employees are also encouraged and able to seek help and advice on corruption-related issues from the Compliance Officer and his staff.’
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 the company is committed to non-retaliation for bona fide reporting of corruption. However, there is no evidence that disciplinary measures are applied to employees who breach this policy. The company therefore scores 1.

References:
Public:
IAI and Business Ethics:
‘The company also has well-publicized communication channels [internal, at this stage], namely an anonymous 24/7 hotline, with a commitment for no retaliation. Through this, any employee can report suspected instances of corrupt activities.’
Information Sources:

Company Website:
www.iai.co.il

Code of Ethics:
http://www.iai.co.il/Sip_Storage//FILES/1/40391.pdf

Anti-Bribery Compliance Manual (February 2014):
http://www.iai.co.il/Sip_Storage//FILES/0/40950.pdf

Terms and Conditions for Acquisition (May 2014):
http://www.iai.co.il/Sip_Storage//FILES/9/40949.pdf