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>10%</td>
</tr>
<tr>
<td>Risk Management</td>
<td>7</td>
<td>0%</td>
</tr>
<tr>
<td>Company Policy and Codes</td>
<td>12</td>
<td>4.2%</td>
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<tr>
<td>Training</td>
<td>5</td>
<td>30%</td>
</tr>
<tr>
<td>Personnel and Helplines</td>
<td>7</td>
<td>14.3%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>41</strong></td>
<td><strong>9.8%</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:
2

Comments:
Based on public information, there is evidence that the company publishes a statement from the Chief Executive Officer specifically supporting the company’s strong stance against corruption.

References:
Public:
Company Website, Compliance:
‘ON CORPORATE COMPLIANCE AT KMW
Dear visitor to www.kmweg.de,

Products in defence technology are not just random industrial goods. As a production location and exporter of defence technology, Germany has a distinguishable responsibility: both in light of its own history and in the context of current global politics. Thus, the sale of defence technology is particularly strictly regulated in our country. We comply with all of these regulations and we take our responsibilities seriously.

As a company with a long tradition, we have acquired an excellent reputation spanning decades. This reputation is based on the achievements of our workforce and the values that we live by at KMW. Managing directors, managers and employees are all obliged to comply with national and international law and the principles of fair competition. We have set up a system of guidelines, obligations and procedures to help us do this that has proven its effectiveness for some considerable time now - including in collaborations with our business partners at home and abroad.

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general or corruption risks in particular.

My fellow board members and I have zero tolerance for criminal activity and infringements of our approved values. And everyone can take us at our word.

We want our world to be safer and more secure - not just through our technologies, but also through our conduct. This is a task we set ourselves each day anew.

Yours sincerely,
Frank Haun
Chief Executive Officer
Krauss-Maffei Wegmann GmbH & Co. KG’
http://www.kmweg.com/company/compliance.html
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 demonstrates a strong personal, external-facing commitment to the ethics and anti-corruption agenda of the company, for example through public speeches or involvement in industry anti-corruption initiatives.

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, for example through direct involvement with the staff on ethics issues, speaking at training, etc.

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 of such a statement. TI notes that the Chief Executive Officer makes reference to company values in a statement on the website; however, no further information was found apart from this brief reference.

References:
Public:
TI notes:
Company Website, Compliance:
‘ON CORPORATE COMPLIANCE AT KMW
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Yours sincerely,
Frank Haun
Chief Executive Officer
Krauss-Maffei Wegmann GmbH & Co. KG

PRESSEMITTEILUNG
‘Krauss-Maffei Wegmann lässt Korruptionsvorwürfe untersuchen
Sofort nach den Presseveröffentlichungen der griechischen Vernehmungsprotokolle hat KMW externe, vom Unternehmen unabhängige Experten mit der Untersuchung der Aussagen beauftragt.’

Pressekontakt
Für weitere Fragen wenden Sie sich bitte an:
Kurt Braatz
Bereichsleiter Strategie und Unternehmenskommunikation
Krauss-Maffei Wegmann GmbH & Co. KG
Krauss-Maffei-Str. 11
80997 München
Tel: +49 89 8140 4675
Mob. +49 151 6285 2741
E-Mail: kurt.braatz@kmweg.de
English translation:
PRESS RELEASE
‘Krauss-Maffei Wegmann commissioned investigation on corruption allegations
Munich 03 01 2014 - In the course of investigation of a corruption scandal in the Greek Ministry of Defence in 2002, a former official of the Ministry has claimed after his arrest to have been bribed by third parties in favor of Krauss-Maffei Wegmann (KMW).
KMW Has neither paid bribes nor have others pay bribes and always obliges all employees and business partners to adhere strictly to the laws and to behave lawfully. The statements of the arrested Greek officials relate to the period 1996-2002 and date back to the business of the predecessor companies of KMW.
Immediately after the press reports in the Greek interrogation protocols KMW has commissioned an external, independent experts with the investigation of the statements.’

Press
For further information please contact:
Kurt Braatz
Head of Strategy and Corporate Communications
Krauss-Maffei Wegmann GmbH & Co. KG
Krauss-Maffei-Str. 11
80997 Munich
Tel: +49 89 8140 4675
Mob. +49 151 6285 2741
E-mail: kurt.braatz@kmweg.de
http://www.kmweg.de/aktuelles/archiv/archive/2014.html
AS:
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 is a part of a national or international business ethics initiative.

References:
Public:
TI notes:
BDI (VDMA is a member of the BDI)
http://www.bdi.eu/BDI_english/485.htm
http://www.bdi.eu/BDI_english/102.htm

VDMA (Krauss Maffei Wegmann is a member of VDMA, representing different enterprises)
http://www.vdma.org/mitglieder
http://www.vdma.org/article/-/articleview/695840

The BME represents the interests of the purchasing, stock control and logistics industries. There is no publicly available list of the BME members. The VDMA represents the interests of German companies in the mechanical engineering industry. The VDMA has a very extensive anti-corruption and integrity guidance document for its members. It is a member organisation of the larger BDI which includes all German industries. The BDI, on its website, clearly opposes corruption and gives a comprehensive overview over its anti-corruption activities, often in collaboration with the German government. The BDSV represents the interests of defence and security companies. A list of its members, including KMW, is publicly available.
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, and who has a direct reporting line to the Board.

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 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.

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, 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 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:
0

Comments:
Based on public information, there is no readily available 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.

References:
Public:
NA
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:
NA
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:
NA
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 some evidence that the company has an anti-corruption policy. However, TI notes that only limited information is provided about this policy publicly in a statement by the CEO on the company website.

References:

Public:
TI notes:
Company Website, Compliance:
‘ON CORPORATE COMPLIANCE AT KMW
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Yours sincerely,
Frank Haun
Chief Executive Officer
Krauss-Maffei Wegmann GmbH & Co. KG’
http://www.kmweg.com/company/compliance.html
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 zero tolerance for corruption. The Board of Directors has zero tolerance for criminal activity and infringements of the approved values. However, this is insufficient to score on this question.

References:
Public:
TI notes:
Company Website, Compliance:
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Frank Haun
Chief Executive Officer
Krauss-Maffei Wegmann GmbH & Co. KG’
http://www.kmweg.com/company/compliance.html
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 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:

1

Comments:

Based on public information, there is evidence of that this policy applies to employees and implicitly that it also applies to the Board. However, TI assesses that the wording is not explicit enough to score higher here. The company therefore scores 1.

References:

Public:
Company Website, Compliance:

‘ON CORPORATE COMPLIANCE AT KMW

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Frank Haun
Chief Executive Officer
Krauss-Maffei Wegmann GmbH & Co. KG’
http://www.kmweg.com/company/compliance.html
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 potential 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 for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery.

References:
Public:
NA
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’s anti-corruption policy includes a statement on the giving and receipt of hospitality that ensures that such transactions are bona fide and not a subterfuge for bribery.

References:
Public:
NA
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 political contributions, or regulates such contributions in order to prevent undue influence or other corrupt intent.

References:

Public:
Ti notes:

File A10 : Political Parties Act (2009) Translated by the Translation Services of the Ministry of Interior, pp. 16-17:
‘Section 25 Donations
(1) Political parties are entitled to accept donations. Donations of up to 1,000 euros may be made in cash. Party members who receive donations on behalf of their party shall immediately pass them on to an Executive Committee member who, under the party statutes, is responsible for the party’s financial matters. Donations shall be considered acquired by a party when an Executive Committee member responsible for the party’s financial matters or a full-time staff member of that party has obtained power of disposal over them; donations that are returned to the donor immediately after their receipt shall not be deemed as having been acquired by the party.
(2) The following shall be excluded from the right of political parties to accept donations:
1. donations from public corporations, parliamentary parties and groups and from parliamentary groups of municipal councils (local assemblies);
2. donations from political foundations, corporate entities, associations of persons and from estates which under the statutes, the foundation charter or other dispositions governing the constitution of such entities, and by the actual business conducted by such entities, are exclusively and directly intended for non-profit, charitable or church purposes (Sections 51 to 68 of the German Fiscal Code (Abgabenordnung, AO);
3. donations from sources outside the territorial scope of this Act unless: a) these donations accrue directly to a political party from the assets of a German as defined by the Basic Law, of a citizen of the European Union, or of a business enter prise, of whose shares more than
50 per cent are owned by Germans as defined by the Basic Law or by a citizen of the European Union or whose registered office is located in a Member State of the European Union; b) they are donations transferred to parties of national minorities in their traditional settlement areas from countries which are adjacent to the Federal Republic of Germany and where members of their ethnic group live; or c) it is a donation not exceeding 1,000 euros made by a foreigner;

4. donations from professional organizations, which were made to the latter subject to the proviso that such funds be passed on to a political party;

5. donations from enterprises that are fully or partly in public ownership or are managed or operated by public agencies if the state’s direct participation amounts to more than 25 per cent;

6. any donations exceeding 500 euros each, which are made by an unidentified donor or which evidently are passed on as a donation by unnamed third parties;

7. donations evidently made in the expectation of, or in return for, some specific financial or political advantage;

8. donations solicited by a third party against a fee to be paid by the political party and amounting to more than 25 per cent of the value of the solicited donation. (3) If the total amount of donations made, and contributions paid by elected representatives/officials, to a political party or to one or more of its regional/local branches exceeds 10,000 euros in any one calendar year (accounting year), they shall be recorded, together with the names and addresses of the donors and the total amount, in the statement of accounts. Single donations in excess of 50,000 euros shall be reported immediately to the President of the German Bundestag. The latter shall in a timely manner publish the donation, together with the donor’s name, as a Bundestag printed paper. (4) Political parties shall hand over any donations that are not allowed under paragraph 2 above to the President of the German Bundestag at once or no later than the time of the submission of the statement of accounts for the respective year (Section 19a para. 3).’

http://www.iuscomp.org/gla/statutes/ParteienG.htm
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, and 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:

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 firm’s ethics and anti-corruption agenda.

References:

Public:
NA
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 provides anti-corruption training.

References:

Public:
Company Website, Compliance:
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Dear visitor to www.kmweg.de,

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Yours sincerely,
Frank Haun
Chief Executive Officer
Krauss-Maffei Wegmann GmbH & Co. KG’
http://www.kmweg.com/company/compliance.html
A28:
Is anti-corruption training provided in all countries where the company operates or has company sites?

Score:

1

Comments:
Based on public information, there is some evidence that anti-corruption training is provided to company employees. However, it is not clear whether training is available across all geographies. The company therefore scores 1.

References:
Public:
Company website, On Corporate Compliance at KMW:
‘In regular training courses, we teach our employees about all aspects of the problem of corruption and educate them in how to detect corruption risks and therefore avoid them early on. Anyone who raises the alarm over suspicious circumstances can rest assured that the company will offer them its full protection. KMW's executive board is the direct contact at all times for any employee with concerns regarding compliance risks in general or corruption risks in particular.’

http://www.kmweg.com/company/compliance.html
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:
TI notes:
Company Website, Compliance:
‘ON CORPORATE COMPLIANCE AT KMW
Dear visitor to www.kmweg.de,

Products in defence technology are not just random industrial goods. As a production location and exporter of defence technology, Germany has a distinguishable responsibility: both in light of its own history and in the context of current global politics. Thus, the sale of defence technology is particularly strictly regulated in our country. We comply with all of these regulations and we take our responsibilities seriously.

As a company with a long tradition, we have acquired an excellent reputation spanning decades. This reputation is based on the achievements of our workforce and the values that we live by at KMW. Managing directors, managers and employees are all obliged to comply with national and international law and the principles of fair competition. We have set up a system of guidelines, obligations and procedures to help us do this that has proven its effectiveness for some considerable time now – including in collaborations with our business partners at home and abroad.

The prevention of corruption lies at the heart of this system. No single employee is entitled to represent the company alone, because the double-checking principle applies without exception. In regular training courses, we teach our employees about all aspects of the problem of corruption and educate them in how to detect corruption risks and therefore avoid them early on. Anyone who raises the alarm over suspicious circumstances can rest assured that the company will offer them its full protection. KMW’s executive board is the
direct contact at all times for any employee with concerns regarding compliance risks in general or corruption risks in particular.

My fellow board members and I have zero tolerance for criminal activity and infringements of our approved values. And everyone can take us at our word.

We want our world to be safer and more secure – not just through our technologies, but also through our conduct. This is a task we set ourselves each day anew.

Yours sincerely,
Frank Haun
Chief Executive Officer
Krauss-Maffei Wegmann GmbH & Co. KG’

http://www.kmweg.com/company/compliance.html
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 one whistleblowing channel for employees to report concerns or instances of suspected corrupt activity. Employees are instructed to directly contact the company’s Executive Board. However, no further details are provided. The company therefore scores 1.

References:

Public:
Company Website, Compliance:

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http://www.kmweg.com/company/compliance.html
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 across geographies, all employees have access to whistleblowing channels. There is insufficient evidence to determine if all employees are able to report to the company’s Executive Board, as no details are provided.

References:
Public:
TI notes:
Company Website, Compliance:
‘ON CORPORATE COMPLIANCE AT KMW
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http://www.kmweg.com/company/compliance.html
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 of a process for supporting 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:
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:

1

Comments:
Based on public information, there is evidence that the company has a commitment to non-retaliation for bona fide reporting of corruption. However, there is no readily available evidence that employees who breach this commitment will be disciplined. The company therefore scores 1.

References:
Public:
Company Website, Compliance:
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http://www.kmweg.com/company/compliance.html
Information Sources:

Company Website:
www.kmweg.com