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

The following table represents a summary of your scores:

<table>
<thead>
<tr>
<th>Topic</th>
<th>Number of questions</th>
<th>% score based on public information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leadership, Governance and Organisation</td>
<td>10</td>
<td>0%</td>
</tr>
<tr>
<td>Risk Management</td>
<td>7</td>
<td>0%</td>
</tr>
<tr>
<td>Company Policy and Codes</td>
<td>12</td>
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<tr>
<td>Training</td>
<td>5</td>
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</tr>
<tr>
<td>Personnel and Helplines</td>
<td>7</td>
<td>0%</td>
</tr>
<tr>
<td>Total</td>
<td>41</td>
<td>0%</td>
</tr>
</tbody>
</table>
A1:
Does the company publish a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company?

Score:

0

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

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

Score:

0

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

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

Score:

0

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

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

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company publishes a statement of values or principles representing high standards of business conduct, including honesty, trust, transparency, openness, integrity and accountability. The Annual Report refers to a Code of Corporate Conduct and compliance with this, but this document does not appear to be publicly available.

References:
Public:

Annual Report, 2012, p.23:
“2.6. Сведения о соблюдении Обществом Кодекса корпоративного поведения Обществом официально не утвержден Кодекс корпоративного поведения или иной аналогичный документ, однако ОАО «РСК «МиГ» обеспечивает своим акционерам (Российская Федерация в лице Федерального агентства по управлению государственным имуществом, ОАО «ОАК») все возможности по участию в управлении Обществом и ознакомлению с информацией о деятельности Общества в соответствии с Федеральным законом «Об акционерных обществах», Федеральным законом «О рынке ценных бумаг» и нормативными правовыми актами федерального органа исполнительной власти по рынку ценных бумаг. Обществом соблюдаются основные положения Кодекса корпоративного поведения, рекомендованного ФКЦБ (в настоящее время – ФСФР). Для осуществления контроля за финансово-хозяйственной деятельностью Общества создан специальный орган – ревизионная комиссия, а также привлекается независимая аудиторская организация (аудитор); для организации внутреннего контроля в Обществе создано Управление внутреннего контроля. Основные положения Кодекса корпоративного поведения закреплены в Уставе ОАО «РСК «МиГ», в Положении об общем собрании акционеров ОАО «РСК «МиГ», в Положении о Совете директоров ОАО «РСК «МиГ» в Положении о Генеральном директоре ОАО «РСК «МиГ», в Положении о Ревизионной комиссии ОАО «РСК «МиГ» и
Section 2.6 indicates that the Company has not officially approved a Code of Corporate Conduct or a similar document. However the company provides its shareholders (the Russian Federation represented by the Federal Agency for State Property Management, Inc.) with every opportunity to participate in the management of the Company. Key provisions of the Code of Corporate Conduct are enshrined in the Charter, the Regulation on the General Meeting of Shareholders, in Position on the Board of Directors, in the Regulations of the General Director, in the Regulation on the Audit Committee, and implemented in practical activities.


Company’s Strategy:
‘RAC "MiG" mission for the nearest period of the strategic planning:
"Development, production, sale and aftersale service of the competitive aeronautical engineering on the basis of the advanced scientific-technological developments, efficient production and advanced sphere of services".

The strategic concept of the Corporation development is the growth strategy on the basis of a full-scale diversification of production, consolidation and strengthening of its positions in the market of aeronautical engineering and services in its operation.

This concept is realized on following basic strategic directions:

- Formation and implementation of priority purpose-oriented programs for development of competitive products.
- Expansion of product market and services of the Corporation, increase of competitiveness of products and services as well as enhancement of marketing activity efficiency.
- Setting up of the Corporation effective high-tech production facilities on the basis of technical re-equipment of enterprises and creation of effective system of quality management.’

http://www.migavia.ru/eng/corporation/?tid=3
A5:
Does the company belong to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption?

Score:

0

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

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

Score:

0

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

References:
Public:
NA
A7:
Has the company appointed a person at a senior level within the company to have responsibility for implementing the company’s ethics and anti-corruption agenda, and who has a direct reporting line to the Board?

Score:

0

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

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

Score:

0

Comments:
Based on public information, there is no readily available evidence that there is regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda.

References:
Public:
NA
A8(a):
Is there a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, and evidence of improvement plans being implemented when issues are identified?

Score:

0

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

References:

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

Score:

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 a formal anti-corruption risk assessment procedure has been 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 of a formal anti-corruption risk assessment procedure for assessing proposed business decisions.

References:

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

Score: 0

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

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

Score:

0

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

References:
Public:
NA
A13:
Does the company make clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance?

Score:

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. TI notes that there is evidence of a policy on procurement, which emphasises the need for equality, fairness, non-discrimination and genuine competition. However, there is no explicit reference to bribery and corruption and no information on the consequences of breaches to this policy.

References:

Public:

TI Notes:

ПОЛОЖЕНИЕ о закупочной деятельности ОАО «РСК «МиГ», 2013, pp.3-4: ‘Конкурентные способы закупок – процедуры закупок, использующие принципы открытости и состязательности предложений, в ходе которых выбор конкурс – процедура конкурентной закупки, торги, регламентируемые ст.ст.447-449 Гражданского Кодекса РФ, основанные на оценке и сопоставлении предложений участников закупки по определенным.’

‘The ‘Position on Procurement Activities’ outlines a competitive procurement processes using principles of openness and competitiveness of proposals, during which the selection of a supplier is based on a fair comparison of several proposals. The procurement procedure must be competitive and trade regulated by st.447-449 of the Civil Code, based on the assessment and comparison of bids.’

p.5: ‘2.1. Предмет и цели регулирования
2.1.1. Настоящее положение (далее – Положение или Положение о закупках) регулирует отношения, связанные с проведением закупок товаров, работ, услуг для
2.1. Object and purpose of regulation
2.1.1. This provision (hereinafter - the provision or provisions of the procurement) governs the relationship related to the procurement of goods, works and services for the Corporation to:
- Timely and fully meet the needs of the Corporation for goods, works and services with the necessary indicators of price, quality and reliability;
- Efficient use of funds;
- Fair competition among suppliers;
- To ensure transparency;
- Avoid purchasing counterfeit products.

2.2. Procurement guidelines
The procurement of goods, works and services the Corporation is guided by the following principles:
- Information transparency of procurement;
- Equality, fairness, non-discrimination on competition in relation to the procurement participants;
- Targeted and cost-effective expenditure of funds for the purchase of goods, works and services (including, if necessary, the life cycle cost of purchased products) and the implementation of measures aimed at reducing the costs of the Corporation;

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:
The Voice of Russia website: Russian aircraft corporation MIG concludes $55-mln service contracts with Indian company at MAKS

‘The Russian aircraft corporation MIG and India’s Basant Aerospace Privet Limited have signed two additional agreements worth in total $55 million at the ongoing MAKS-2013 air show as part of a general offset contract with the Indian Air Force, MIG said in a statement.

"Two contracts worth $43 million and $12 million envision the establishment of service centers in India to maintain Zhuk-ME onboard radar systems manufactured by Fazotron-NIIR and other equipment for MiG-29UPG planes," a MIG spokesperson said.’

Russia Aviation website: MiG service center responsible for maintenance of MiG-29 fighters to open in India next year

‘A service centre for MiG-29 aircraft will be operational in India from next year, Sergei Korotkov, chief executive officer of Russian Aircraft Corporation (RSK) MiG told reporters.

“This year we have already provided equipment for this onsite service centre, which was built as part of the agreement, and, starting next year, this service centre should operate in accordance with the contractual obligations that were taken by both sides,” Korotkov said.

Itar-Tass had reported during the MAKS-2013 air show that MiG signed two additional agreements worth $55 million with India’s Basant Aerospace Private Limited as part of a general offset contract with India.’
A13(b):
Does the company conduct due diligence that minimises corruption risk when selecting its offset partners and offset brokers?

Score:
0

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

References:
Public:
TI Notes:
The Voice of Russia website: Russian aircraft corporation MIG concludes $55-mln service contracts with Indian company at MAKS
‘The Russian aircraft corporation MIG and India’s Basant Aerospace Privet Limited have signed two additional agreements worth in total $55 million at the ongoing MAKS-2013 air show as part of a general offset contract with the Indian Air Force, MIG said in a statement.
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Itar-Tass had reported during the MAKS-2013 air show that MiG signed two additional agreements worth $55 million with India’s Basant Aerospace Private Limited as part of a
general offset contract with India.’
A15:
Does the company have an anti-corruption policy that prohibits corruption in its various forms?

Score:
0

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

References:
Public:
NA
A16: Is the anti-corruption policy explicitly one of zero tolerance?

Score:

0

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

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

Score:

0

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

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

Score:

0

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

References:
Public:
NA
A18:

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

Score:

0

Comments:

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

References:

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

Score:

0

Comments:

Based on public information, there is evidence that a policy on potential conflicts of interests applies to the Board of Directors. The Regulations on the Board of Directors states that the Board must refrain from actions that may lead to conflicts of interests and that matters in which an individual has a personal interest must be disclosed to the Board. However, TI has found no further information on this policy and there is no publicly available evidence that this policy also applies to all employees.

References:

Public:

TI Notes:

ПОЛОЖЕНИЕ О СОВЕТЕ ДИРЕКТОРОВ (REGULATIONS OF THE BOARD OF DIRECTORS), 2010, p.5 : «2.9. Членам Совета директоров рекомендуется:
2.9.1. Воздерживаться от действий, которые приведут или потенциально способны привести к возникновению конфликта между их интересами и интересами Общества, а в случае наличия или возникновения такого конфликта – раскрывать информацию о нем Совету директоров и принимать меры к соблюдению порядка совершения действий или заключения сделок, в которых у члена Совета директоров есть заинтересованность;
2.9.2. Воздерживаться от голосования по вопросам, в принятии решений по которым у него имеется личная заинтересованность. При этом член Совета директоров должен немедленно в письменном виде раскрывать Совету директоров через Секретаря Совета директоров как сам факт такой заинтересованности, так и основания ее возникновения.

This section outlines recommendations to the Board, including :
2.9.1. Refrain from any action that will or may lead to a conflict of interests. Conflicts of Interest must be disclosed to the Board of Directors
2.9.2. Abstain from voting on matters in which an individual has a personal interest. The Board of Directors must also immediately disclose in writing, to the Board of Directors through the Secretary of the Board of Directors, the nature of the interest and the base of
its occurrence.
http://www.migavia.ru/ustav/PologenieSDnew.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:

0

Comments:
Based on public information, there is evidence that a policy on the receipt of gifts applies to the Board of Directors. The Regulations on the Board of Directors states that Board members are prohibited from accepting gifts or benefits offered by third parties if they are not symbolic tokens in accordance with generally accepted rules or courtesy or souvenirs at official events. However, TI has found no further information on this policy and there is no publicly available evidence that this policy also applies to all employees.

References:
Public:
TI Notes:
ПОЛОЖЕНИЕ О СОВЕТЕ ДИРЕКТОРОВ (REGULATIONS OF THE BOARD OF DIRECTORS), 2010, p.5 : «2.10. Члену Совета директоров запрещается:
2.10.1. Принимать подарки от лиц, заинтересованных в принятии решений, связанных с исполнением членом Совета директоров своих обязанностей, равно как и пользование какими-либо инymi прямыми или косвенными выгодами, предоставленными третьими лицами (за исключением символовических знаков внимания в соответствии с общепринятыми правилами вежливости или сувениров при проведении официальных мероприятий);
2.10.2. Использовать в личных интересах или в интересах третьих лиц конфиденциальную информацию или инсайдерскую информацию об Обществе ».
2.10. Members of the Board shall be prohibited from:
2.10.1. Accepting gifts from individuals interested in making decisions related to the execution of Board duties, as well as the use of any other direct or indirect benefits offered by third parties (except for symbolic tokens in accordance with the generally accepted rules of courtesy or souvenirs at official events);
2.10.2. Sharing confidential or insider information about the company for personal or third party interests.
http://www.migavia.ru/ustav/PologenieSDnew.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:
0

Comments:
Based on public information, there is evidence that a policy on the receipt of benefits, which may include hospitality, applies to the Board of Directors. The Regulations on the Board of Directors states that Board members are prohibited from accepting any gifts or benefits offered by third parties if they are not symbolic tokens in accordance with generally accepted rules or courtesy or souvenirs at official events. However, TI has found no further information on this policy and there is no publicly available evidence that this policy also applies to all employees.

References:

Public:
TI Notes:
ПОЛОЖЕНИЕ О СОВЕТЕ ДИРЕКТОРОВ (REGULATIONS OF THE BOARD OF DIRECTORS), 2010, p.5 : «2.10. Члену Совета директоров запрещается:
2.10.1. Принимать подарки от лиц, заинтересованных в принятии решений, связанных с исполнением членом Совета директоров своих обязанностей, равно как и пользование какими-либо иными прямыми или косвенными выгодами, предоставленными третьими лицами (за исключением символов-либо знаков внимания в соответствии с общепринятыми правилами вежливости или сувениров при проведении официальных мероприятий);
2.10.2. Использовать в личных интересах или в интересах третьих лиц конфиденциальную информацию или инсайдерскую информацию об Обществе ».
2.10. Members of the Board shall be prohibited from:
2.10.1. Accepting gifts from individuals interested in making decisions related to the execution of Board duties, as well as the use of any other direct or indirect benefits offered by third parties (except for symbolic tokens in accordance with the generally accepted rules of courtesy or souvenirs at official events);
2.10.2. Sharing confidential or insider information about the company for personal or third
party interests.
http://www.migavia.ru/ustav/PologenieSDnew.pdf
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:
NA
A25: Does the company have a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, and discloses the issues on which the company lobbies?

Score: 0

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

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

Score:
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. However, TI notes that the company does contribute charitable donations to various groups.

References:
Public:
TI Notes:
Company’s News:
“Employees of the Russian Aircraft Corporation MiG have given humanitarian aid to the Ukrainian refugees
On the 10th July 2014 the company’s transport airplane AN-32 has delivered in Crimea humanitarian aid designated to people forced to leave Ukraine. Employees of the company, labour veterans and pensioners took part in the collection of goods and aid”

http://www.migavia.ru/news/?page=1&tid=4&id=108
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:

0

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

References:
Public:
NA
A28:
Is anti-corruption training provided in all countries where the company operates or has company sites?

Score:

0

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

References:
Public:
NA
A29: Does the company provide targeted anti-corruption training to members of the Board?

Score: 0

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

References:

Public: NA
A30:
Does the company provide tailored ethics and anti-corruption training for employees in sensitive positions?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company provides tailored ethics and anti-corruption training for employees in sensitive positions.

References:
Public:
NA
A31:
Does the company have a clear and formal process by which employees declare conflicts of interest?

Score:
0

Comments:
Based on public information, there is evidence that Board members must declare conflicts of interest, as outlined in the Regulations on the Board of Directors. However, TI has found no further information on this process and there is no publicly available evidence that this policy also applies to all employees.

References:

Public:

TI Notes:

ПОЛОЖЕНИЕ О СОВЕТЕ ДИРЕКТОРОВ (REGULATIONS OF THE BOARD OF DIRECTORS), 2010, p.5: «2.9. Членам Совета директоров рекомендуется:
2.9.1. Воздерживаться от действий, которые приведут или потенциально способны привести к возникновению конфликта между их интересами и интересами Общества, а в случае наличия или возникновения такого конфликта – раскрывать информацию о нем Совету директоров и принимать меры к соблюдению порядка совершения действий или заключения сделок, в которых у члена Совета директоров есть заинтересованность;
2.9.2. Воздерживаться от голосования по вопросам, в принятии решений по которым у него имеется личная заинтересованность. При этом член Совета директоров должен немедленно в письменном виде раскрывать Совету директоров через Секретаря Совета директоров как сам факт такой заинтересованности, так и основания ее возникновения.

This section outlines recommendations to the Board, including:

2.9.1. Refrain from any action that will or may lead to a conflict between their interests and the interests of the company and in a case of such a conflict - to be disclosed to the Board of Directors
2.9.2. Abstain from voting on matters in which an individual has a personal interest. The Board of Directors must also immediately disclose in writing, to the Board of Directors through the Secretary of the Board of Directors, the nature of the interest and the base of
its occurrence.

http://www.migavia.ru/ustav/PologenieSDnew.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:

0

Comments:

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

References:

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

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has multiple, well-publicised channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee (e.g. web, phone, in person), to report concerns or instances of suspected corrupt activity.

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

Score:

0

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

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

Score:

0

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

References:
Public:
NA
A34: Does the company have well-publicised resources available to all employees where help and advice can be sought on corruption-related issues?

Score: 0

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

References:

Public: NA
A35:

Is there a commitment to non-retaliation for bona fide reporting of corruption?

Score:

0

Comments:

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

References:

Public:
NA
Information Sources:

Company website:
http://www.migavia.ru

News, Company website:
http://www.migavia.ru/news/?page=1&tid=8&id=51

Regulations of the Board of Directors, Company website:
http://www.migavia.ru/ustav/PologenieSDnew.pdf