FINAL ASSESSMENT
RUSSIAN HELICOPTERS JSC

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>
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<tr>
<td>Leadership, Governance and Organisation</td>
<td>10</td>
<td>0%</td>
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<td>Risk Management</td>
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<td>Company Policy and Codes</td>
<td>12</td>
<td>4.2%</td>
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<td>Training</td>
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<td>Personnel and Helplines</td>
<td>7</td>
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<td><strong>Total</strong></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:

0

Comments:

Based on public information, there is no readily available evidence that the company publishes a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company. TI notes that the General Manager introduces the Code of Ethics. However, this document is dated 2009 - which is before the consolidation of the company completed in 2011 - and this is outside the two year timeframe of this question.

References:

Public:

TI notes:

ОТКРЫТОЕ АКЦИОНЕРНОЕ ОБЩЕСТВО «ВЕРТОЛЁТЫ РОССИИ»: Кодекс корпоративной этики, p.1:

'Уважаемые коллеги!
Предлагаю Вашему вниманию Кодекс корпоративной этики Холдинга... Кодекс закрепляет важнейшие ценности Холдинга, этические принципы и нормы поведения, понимать и принимать которые должны все сотрудники Холдинга.
Я уверен, что кодекс корпоративной этики поможет нам поддерживать и укреплять имидж современного и эффективно работающего Холдинга, в котором работают компетентные сотрудники, ориентированные на результат.
С уважением,
Генеральный директор А.Б. Шибитов'

Joint Stock Company «Russian Helicopters»: Code of Ethics, p.1:

'Dear Colleagues,

RUSSIAN HELICOPTERS 14/04/14
WWW.RUSSIANHELICOPTERS.AERO/EN/
I am bringing to your attention the Code of Ethics of the company... The Code fixes the most important values of the company, ethical principles and standards of behavior, that all employees must understand and accept. I am certain that the Code of Ethics will help us to maintain and strengthen the image of a modern and efficient company which employs competent and results-oriented staff.

Sincerely,

General Manager AB Shibitov

http://www.russianhelicopters.aero/upload/iblock/47a/47abb1704d0ec4968eb496c68cfc573f.pdf

Company Annual Report (2012):

‘To achieve improved results, we shall continue to increase the enterprises’ operating efficiency and to optimize the Holding’s organizational structure, taking into consideration modern best practices. Chairman of the Board of Directors of JSC Russian Helicopters

Deputy Director General of Rostec

Vladimir V. Artyakov’

‘We shall spare no effort to keep the Company dynamically growing, advancing, and strengthening its position in the global market.

Director General of JSC Russian Helicopters Dmitry E. Petrov’

http://www.russianhelicopters.aero/upload/iblock/308/30854b5486fc4cc65d24b4427d4cd4bc.PDF

Russian Helicopters, JSC finalize consolidation of holding's assets (January, 2011):

‘Russian Helicopters, JSC, that makes part of UIC Oboronprom, consolidated control stock of all Russia's rotorcraft-building enterprises, thus finalizing main formation stages of united Russian holding that deals in helicopter design, manufacture and servicing.’

A2:

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

Score:

0

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

References:
Public:
NA
A3:

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

Score:

0

Comments:

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

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 evidence that the company has published a Code of Ethics, which identifies a number of values, ethical principles, and standards of behavior for employees. However, this document does not refer to honesty, trust, transparency, openness, integrity, or accountability. Evidence suggests that the company is a fully owned subsidiary of Oboronprom, which is part of Rostec Corporation (Russian Technologies). However, there is no readily available evidence to confirm that the company publicly subscribes to the policies of Oboronprom and Rostec, and these companies do not seem to publish a statement of values representing the above-mentioned standards.

References:

Public:

TI notes:

ОТКРЫТОЕ АКЦИОНЕРНОЕ ОБЩЕСТВО «ВЕРТОЛЁТЫ РОССИИ»: Кодекс корпоративной этики
Joint Stock Company «Russian Helicopters»: Code of Ethics
http://www.russianhelicopters.aero/upload/iblock/47a/47abb1704d0ec4968eb496c68cf573f.pdf

О Холдинге (About the Holding): ‘Вертолёты России’ – дочерняя компания ОПК «Оборонпром», часть Госкорпорации Ростех.’
‘Russian Helicopters is a subsidiary of Oboronprom, part of Rostec’
http://www.russianhelicopters.aero/ru/about/

Социальная ответственность/Social Responsibility:
‘Холдинг «Вертолёты России» является приверженцем высоких правовых, деловых и этических стандартов работы, развивая культуру противодействия должностным

RUSSIAN HELICOPTERS 14/04/14
WWW.RUSSIANHELICOPTERS.AERO/EN/
‘Holding company "Helicopters of Russia" is committed to high legal, business and ethical standards of work, developing a culture of combatting the abuse of office.’

http://www.russianhelicopters.aero/ru/about/social_responsibility/

Company Annual Report (2012):
‘Although Russian Helicopters is a private company, we are moving towards implementing a system of corporate governance in line with the best international practice and requirements of the Russian and international Codes of Corporate Conduct and Codes of Ethics as well as the requirements of FFMS and FSA.’

http://www.russianhelicopters.aero/upload/iblock/308/30854b5486fc4cc65d24b4427d4cd4bc.PDF

Oboronprom Values: ‘Sectoral Leadership, Professionalism, Social Responsibility’

http://www.oboronprom.ru/en/about/values
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, 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 of regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda.

References:

Public:
NA
A8(a):

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

Score:

0

Comments:

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

References:

Public:
NA
A9:

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

Score:

0

Comments:

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

References:

Public:

NA
A9(a):
Does the company have a formal anti-corruption risk assessment procedure implemented enterprise-wide?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a formal anti-corruption risk assessment procedure implemented enterprise-wide.

References:
Public:
NA
A10:

Does the company have a formal anti-corruption risk assessment procedure for assessing proposed business decisions, with clear requirements on the circumstances under which such a procedure should be applied?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has a formal anti-corruption risk assessment procedure for assessing proposed business decisions, 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:
TI notes:
Company website: An interview with Sergei Goreslavsky, an expert on military-technical cooperation with Latin American countries
‘What is the “offset program”?’
First we create a major service center for maintenance and repair, including overhaul, of helicopters. This will significantly improve the operation and, consequently, reliability of our helicopters.’
A13(b):

Does the company conduct due diligence that minimises corruption risk when selecting its offset partners and offset brokers?

Score:

0

Comments:

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

References:

Public:
See A13(a) references
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 of an anti-corruption policy that prohibits corruption in its various forms. TI notes that there is evidence that the company states a commitment to ‘high legal, business and ethical standards’ and developing a culture of combatting the abuse of office. There is also a clear link to the policies of Oboronprom and Rostec, although they are not publicly endorsed by the company. The Rostec anti-corruption statement, however, remains legalistic and refers to the national legal framework of the Russian Federation, without developing the company’s own anti-corruption policies and procedures.

References:

Public:
TI notes:

Вертолеты России website: Социальная ответственность (Social Responsibility)
‘Холдинг «Вертолёты России» является приверженцем высоких правовых, деловых и этических стандартов работы, развивая культуру противодействия должностным злоупотреблениям.
Холдинг стремится обеспечивать доверие работников и третьих лиц, приглашает их к открытому диалогу и призывает с помощью «Линии доверия» активно участвовать в противодействии злоупотреблениям в холдинге, сообщая о негативных событиях, которые им стали известны.’

‘Holding company "Helicopters of Russia" is committed to high legal, business and ethical standards of work, developing a culture of combatting the abuse of office.
It seeks to ensure the trust of employees and third parties, inviting them to open dialogue and encouraging use of the "Helpline" to actively participate in combating abuse in the company, and report adverse events as they arise.’

http://www.russianhelicopters.aero/ru/about/social_responsibility/
Rostec Corporation Anti-corruption (Russian):

‘КОРРУПЦИЯ:
а) злоупотребление служебным положением, дача взятки, получение взятки, злоупотребление полномочиями, коммерческий подкуп либо иное незаконное использование физическим лицом своего должностного положения вопреки законным интересам общества и государства в целях получения выгоды в виде денег, ценностей, иного имущества или услуг имущественного характера, иных имущественных прав для себя или для третьих лиц либо незаконное предоставление такой выгоды указанному лицу другими физическими лицами;
б) совершение деяний, указанных в подпункте «а» настоящего пункта, от имени или в интересах юридического лица;

ПРОТИВОДЕЙСТВИЕ КОРРУПЦИИ - деятельность федеральных органов государственной власти, органов государственной власти субъектов Российской Федерации, органов местного самоуправления, институтов гражданского общества, организаций и физических лиц в пределах их полномочий:
а) по предупреждению коррупции, в том числе по выявлению и последующему устранению причин коррупции (профилактика коррупции);
б) по выявлению, предупреждению, пресечению, раскрытию и расследованию коррупционных правонарушений (борьба с коррупцией);
в) по минимизации и (или) ликвидации последствий коррупционных правонарушений.’

(СТ.3 ФЕДЕРАЛЬНОГО ЗАКОНА ОТ 25 ДЕКАБРЯ 2008 Г. № 273-ФЗ «О ПРОТИВОДЕЙСТВИИ КОРРУПЦИИ»)

ПРОТИВОДЕЙСТВИЕ КОРРУПЦИИ в Российской Федерации основывается на следующих основных принципах:
- признание, обеспечение и защита основных прав и свобод человека и гражданина;
- законность;
- публичность и открытость деятельности государственных органов и органов местного самоуправления;
- неотвратимость ответственности за совершение коррупционных правонарушений;
- комплексное использование политических, организационных, информационно-пропагандистских, социально-экономических, правовых, специальных и иных мер;
- приоритетное применение мер по предупреждению коррупции;
- сотрудничество государства с институтами гражданского общества, международными организациями и физическими лицами.’

‘Corruption:
а) abuse of office, bribery, receiving bribery, abuse of power, commercial bribe or any other illegal use of one’s position against the legal interest of society and state with the aim to receive benefit in the form of money, valuables, property or services, any property rights for themselves or third parties or illegal provision of such a benefit to
the specified person other individuals

b) carrying out of actions as specified in sub-paragraph "a" on behalf of or for the benefit of a legal entity;

Anti-Corruption – refers to the actions undertaken by the federal bodies of state, bodies of state of subjects of the Russian Federation, local authorities, civil society, organizations and individuals within their powers:

a) to prevent corruption, including the detection and subsequent removal of the causes of corruption (prevention of corruption);

b) the identification, prevention, countering, and investigation of corruption offenses (anti-corruption);

c) mitigate and (or) the elimination of the consequences of corruption offenses

(p. 3 FEDERAL LAW AS OF 25th DECEMBER 2008, number 273-FZ : ON ANTI-CORRUPTION)

Anti-corruption in Russia is based on the following principles:

- The recognition, promotion and protection of fundamental human and citizens rights and;
- rule of law;
- publicity and openness of the state bodies and local self-government;
- inevitable liability for corruption;
- combined use of political, organizational, advocacy, socio-economic, legal, special and other measures;
- priority application of measures to prevent corruption;
- cooperation of the state with organisations of the civil society, international organisations and individuals.’

http://rostec.ru/anticorruption
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’s anti-corruption policy is explicitly one of zero tolerance.

References:

Public:
NA
A17:

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

Score:

0

Comments:

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

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 Board members.

References:
Public:
NA
A20:

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

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has a policy on potential conflicts of interest. TI notes that Russian Technologies have a Committee on Conflicts of Interest, but it does not include any publicly available definitions or stipulations.

References:

Public:

TI notes:

State company « Russian Technologies » Committee on Conflicts of Interest (Russian):

http://rostec.ru/anticorruption/conflicts/
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, the information provided is limited, as it does not provide details of upper limits and it is unclear what is meant by ‘generally accepted perceptions of business gifts’. The company therefore scores 1.

References:

Public:
ОТКРЫТОЕ АКЦИОНЕРНОЕ ОБЩЕСТВО «ВЕРТОЛЁТЫ РОССИИ»: Кодекс корпоративной этики, p.4:
‘VII. Подарки и вознаграждения
8.1. Сотрудник Холдинга, которому в связи с местом его работы и исполнением должностных обязанностей предлагается вознаграждение, как в прямом, так и в косвенном виде, которое способно повлиять на подготовляемые и/или принимаемые им решения или оказать влияние на его действия (бездействие), должен:
1) отказаться от вознаграждения,
2) уведомить своего непосредственного руководителя о факте предложения вознаграждения,
3) продолжить работу в установленном в Холдинге порядке над вопросом, с которым было связано вознаграждение.
Непосредственный руководитель должен принять решение о целесообразности дальнейших деловых контактов с лицом, предложившим вознаграждение.
8.2. В случае, если сотруднику в связи с днем его рождения, государственным праздником РФ или по какому-либо другому поводу был сделан подарок, стоимость
VII. Gifts and favors
8.1. An officer the company which, in connection with their place of work and the execution of their duties, it is proposed both directly and indirectly, which may affect the production and/or decisions or have an impact on his actions (or inaction) must:
1) refuse the remuneration
2) notify their supervisor of the remuneration
3) to continue to work in accordance with company procedures.
8.2. If the event that an employee, in connection with his birthday, state Russian holiday or on any other occasion, was given a gift of value exceeding 10 000 rubles and/or they it does not comply with generally accepted perceptions of business gifts, employees must inform their supervisor.

http://www.russianhelicopters.aero/upload/iblock/47a/47abb1704d0ec4968eb496c68cfc573f.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 no readily available evidence of that the company has a policy for 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:
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. TI notes that the Rostec corporation, of which the company is a part, allows charitable contributions.

References:

Public:
TI notes:
Rostec Social Responsible Approach to Business:
‘A sound social policy is an important element of any modern company. Rostec includes companies that display a high sense of social responsibility, including many that devote a large amount of attention to programs that care for children.’
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 no readily available evidence that the company has a clear and formal process by which employees can declare conflicts of interest. TI notes that the Rostec Corporation has in place a Committee for supervising conflicts of interest. However, evidence refers only to the members of the Committee and the general framework within which the Committee operates, rather than a formal process by which employees can declare conflicts of interest.

References:
Public:
TI notes:
Rostec Committee for Conduct and Conflicts of Interest (Russian):
http://rostec.ru/anticorruption/conflicts/

Rostec Policy on Conflict of Interest (Russian):
http://rostec.ru/content/files/anticorruption/6/%D0%9F%D0%BE%D0%BB%D0%BE%D0%B6%D0%B5%D0%BD%D0%B8%D0%B5%20%D0%BE%20%D0%BE%D0%BC%D0%B8%D1%81%D0%B8%D0%B8.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 has an explicit 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:

1

Comments:

Based on public information, there is evidence that the company provides a whistleblowing channel for employees to report concerns or instances of suspected corrupt activity. The Hotline is available via fax, telephone, e-mail or post, with confidentiality guaranteed. The company therefore scores 1. To score higher the company would need to provide evidence of at least one other whistleblowing channel that is externally operated and facilitates anonymous reporting.

References:

Public:
Вертолеты России website: Социальная ответственность (Social Responsibility)
‘Линия доверия’ холдинга «Вертолёты России»
Холдинг «Вертолёты России» является приверженцем высоких правовых, деловых и этических стандартов работы, развивая культуру противодействия должностным злоупотреблениям.
Холдинг стремится обеспечивать доверие работников и третьих лиц, приглашает их к открытом диалогу и призывает с помощью «Линии доверия» активно участвовать в противодействии злоупотреблениям в холдинге, сообщая о негативных событиях, которые им стали известны.
Конфиденциальность обращения гарантирована.
Для приема сообщений от работников холдинга и третьих лиц используются способы связи: круглосуточный телефон/факс с автоответчиком: 8 (800) 250-60-90 (звонок бесплатный из всех регионов России);
электронная почта: doverie@rus-helicopters.com;
абонентский почтовый ящик с адресом: 125009, г. Москва, ул. Тверская, д.7, а/я 70 (для
"Hotline" holding company "Russian Helicopters"

Holding company "Helicopters of Russia" is committed to high legal, business and ethical standards of work, developing a culture of combating the abuse of office. It seeks to ensure the trust of employees and third parties, inviting them to open dialogue and encouraging use of the "Helpline" to actively participate in combating abuse in the company, and report adverse events as they arise.

Confidentiality is guaranteed.

Methods of communication for employees and third parties are: phone / fax with an answering machine: 8 (800) 250-60-90 (Toll-free from all regions of Russia); Email: doverie@rus-helicopters.com; the subscriber's mailbox with the address: 125009, Moscow, ul. Tverskaya, 7, / I 70 (for post).

Regulation "on" «Helpline» in holding company «Helicopters of Russia" approved by order of the General Director of JSC "Russian Helicopters" from 04.12.2012, № 155-CC."

http://www.russianhelicopters.aero/ru/about/social_responsibility/
A33(a):

Are the whistleblowing channels available to all employees in all geographies?

Score:

1

Comments:

Based on public information, there is evidence that across geographies, all employees have access to the Hotline. The company therefore scores 1. To score higher the company would need to provide evidence that across geographies, all employees have access to more than one whistleblowing channel.

References:

Public:

Вертолеты России website: Социальная ответственность (Social Responsibility)
‘Линия доверия’ холдинга «Вертолёты России»

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Холдинг стремится обеспечивать доверие работников и третьих лиц, приглашает их к открытому диалогу и призывает с помощью «Линии доверия» активно участвовать в противодействии злоупотреблениям в холдинге, сообщая о негативных событиях, которые им стали известны.

Конфиденциальность обращения гарантирована.

Для приема сообщений от работников холдинга и третьих лиц используются способы связи:
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электронная почта: doverie@rus-helicopters.com;
абонентский почтовый ящик с адресом: 125009, г. Москва, ул. Тверская, д.7, а/я 70 (для писем).

"Hotline" holding company "Russian Helicopters"
Holding company "Helicopters of Russia" is committed to high legal, business and ethical standards of work, developing a culture of combatting the abuse of office.
It seeks to ensure the trust of employees and third parties, inviting them to open dialogue and encouraging use of the "Helpline" to actively participate in combating abuse in the company, and report adverse events as they arise.
Confidentiality is guaranteed.
Methods of communication for employees and third parties are: phone / fax with an answering machine: 8 (800) 250-60-90 (Toll-free from all regions of Russia); Email: doverie@rus-helicopters.com; the subscriber's mailbox with the address: 125009, Moscow, ul. Tverskaya, 7, / 170 (for post).
Regulation "on" «Helpline» in holding company «Helicopters of Russia" approved by order of the General Director of JSC "Russian Helicopters" from 04.12.2012, № 155-CC.’
http://www.russianhelicopters.aero/ru/about/social_responsibility/
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, or 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. It is unclear if employees can receive help and advice from the Helpline, rather than just report corruption incidents.

References:

Public:
TI notes:
Вертолеты России website: Социальная ответственность (Social Responsibility)
‘Линия доверия» холдинга «Вертолёты России»
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Положение «О «Линии доверия» в холдинге «Вертолёты России» утверждено
"Hotline" holding company "Russian Helicopters"

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Confidentiality is guaranteed.

Methods of communication for employees and third parties are: phone / fax with an answering machine: 8 (800) 250-60-90 (Toll-free from all regions of Russia); Email: doverie@rus-helicopters.com; the subscriber's mailbox with the address: 125009, Moscow, ul. Tverskaya, 7, / I 70 (for post).

Regulation "on" «Helpline» in holding company «Helicopters of Russia" approved by order of the General Director of JSC "Russian Helicopters" from 04.12.2012, № 155-CC."

http://www.russianhelicopters.aero/ru/about/social_responsibility/
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’s website:
http://www.russianhelicopters.aero/en/

Code of Corporate Ethics, Russian Helicopters (2009):
http://www.russianhelicopters.aero/upload/iblock/47a/47abb1704d0ec4968eb496c68cfc573f.pdf

Company Annual Report (2012):
http://www.russianhelicopters.aero/upload/iblock/308/30854b5486fc4cc65d24b4427d4cd4bc.PDF