

## FINAL ASSESSMENT

### TERMA A/S

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

The following table represents a summary of your scores:

Topic	Number of questions	% score based on public information
Leadership, Governance and Organisation	10	20%
Risk Management	7	7.1%
Company Policy and Codes	12	29.2%
Training	5	0%
Personnel and Helplines	7	0%
<b>Total</b>	<b>41</b>	<b>14.6%</b>

**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's CEO has issued one strong statement on corruption. Whilst it is itself undated, it is referenced from the 2014 website.

**References:**

Public:

Terma Statement on Fight against Corruption (date unknown):

'Corruption is an illegal and unacceptable activity, which tarnishes company brands and destroys their future business opportunities and places the employees in punishable and morally irresponsible situations it also has a destructive effect on the societies and markets which are affected by it. Therefore, Terma strongly dissociates itself from any kind of bribery and works hard to ensure that the company and our employees do not contribute to bribery or other kinds of corruption. We strongly emphasize that Terma observes national rules against corruption and thus abides by the UN, OECD and the AeroSpace and Defence Industries Association of Europe's (ASD) guidelines on the fight against corruption. The main aim of the Terma Code of Conduct is to ensure that none of our employees, or others who represent Terma, offer or gain unjust advantages from officials or the company's cooperation partners. The Terma Code of Conduct describes the values and spirit, which characterize the Terma business methods. The signatures below emphasize to external partners that Terma management and employees are not allowed to and do not want to participate in any kind of corruption.

Jens Maaloe, President and CEO'

<http://www.terma.com/media/24453/anti-corruption.pdf>

**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:**

**1**

**Comments:**

Based on public information, there is evidence that the company has a statement of values which include integrity, honesty and trust, but these are assessed to fall short of the range of values sought by the question and are only briefly discussed. The company therefore scores 1.

**References:**

Public:

Company website: About us

'The values have been developed to support Terma's corporate strategy and are built on the strong culture that exists in Terma.

Act globally- I'm your close ally

Deliver the promise- I keep my promises

Work with integrity- I'm your teammate

Learn and improve- I do my best to be world-class

Show passion- I'm a professional'

<http://www.terma.com/about-us/vision,-mission-values/values/>

Terma's Values Flyer (date unknown):

'Work With Integrity

Definition

- We respect and trust one another
- We take responsibility and act as team players
- We speak straight from the heart
- We utilize our differences as a strength

Objective

- To remove barriers
- To pull together as a team
- To develop and maintain long-lasting relations
- To attract world-class employees

Behavior

- Show respect
- Be honest
- Help each other'

<http://www.terma.com/media/49932/ourvaluesflyer.pdf>

**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 any such initiative. TI notes that the company affirms to be a member of ASD; however, its membership is not listed on the ASD website.

**References:**

Public:

TI notes:

Company website: CSR

‘In Europe, Terma is a member of a committee on business ethics within the AeroSpace & Defence Industries Association of Europe (ASD). Our participation focuses on increasing the industry’s objective of countering corruption via joint European harmonization and simplification of ethical guidelines, standards, and principles.’

<http://www.terma.com/about-us/csr/>

Terma Anti-corruption Statement:

“We strongly emphasize that Terma observes national rules against corruption and thus abides by the UN, OECD and the AeroSpace and Defence Industries Association of Europe's (ASD) guidelines on the fight against corruption.”

ASD website:

<http://www.asd-europe.org/about-us/structure/asd-members/>

**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:**

**1**

**Comments:**

Based on public information, there is evidence that the company evaluates their code of conduct annually. However, there is no readily available evidence that this covers the whole anti-corruption and ethics agenda or that it is a Board level review. The company therefore scores 1.

**References:**

Public:

Annual Report (2013-2014), p.15:

'Terma has a "Code of Conduct" that specifies clear rules of engagement. The main objective is to ensure that none of Terma's employees, or others who represent our company, seek to gain unjust advantages from authorities or other cooperation partners. The Code of Conduct has been in place since 2008. It is evaluated on a yearly basis by Terma's Management and is communicated to all employees and external partners. We did not find any examples of violation in the 2013/14 fiscal year. In addition, Terma has established a process for engaging Terma's agents that ensures proper due diligence and training of agents and partners worldwide. The process will be implemented in 2014 and will be followed by screening of our existing and potential agents, including resellers, consultants, and industrial partners. Regarding export projects, Terma is compliant with the International Finance Corporation's 10 Performance Standards on Environmental and Social Sustainability, i.e. [www.IFC.org](http://www.IFC.org). We carry out an examination of our export projects' compliance with these standards, and we have not seen any occurrences of violation in the 2013/14 fiscal year.'

<http://www.terma.com/about-us/reports/annual-report/>

**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 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 evidence that the company intends to implement a due diligence process for agents in 2014. However, the status of this implementation is not clear and there is no detail provided regarding whether this due diligence will be refreshed every 3 years or when there is a significant change in the business relationship.

**References:**

Public:

TI notes:

Annual Report (2013-2014), p.15:

‘1. Customers Aspirational Goal: The aim of corporate governance at Terma is to build a culture of integrity and ethical behavior in countries where we do business. Our values and principles provide fundamental guidance for our actions and govern the relationship with our employees, customers, suppliers, and communities.

Activities: To fight corruption within our sector and show that Terma has an unambiguous and clear attitude towards this practice. Corruption is an unfortunate reality which we as an international company need to pay strong attention to. We are dedicated in our fight against corruption, since such practices are morally indefensible and never acceptable.

Terma has a “Code of Conduct” that specifies clear rules of engagement. The main objective is to ensure that none of Terma’s employees, or others who represent our company, seek to gain unjust advantages from authorities or other cooperation partners. The Code of Conduct has been in place since 2008. It is evaluated on a yearly basis by Terma’s Management and is communicated to all employees and external partners. We did not find any examples of violation in the 2013/14 fiscal year. In addition, Terma has established a process for engaging Terma’s agents that ensures proper due diligence and training of agents and partners worldwide. The process will be implemented in 2014 and will be followed by screening of our existing and potential agents, including resellers, consultants, and industrial partners. Regarding export projects, Terma is compliant with the International Finance Corporation’s 10 Performance Standards on Environmental and Social Sustainability, i.e.

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[HTTP://WWW.TERMA.COM/](http://www.terma.com/)

[www.IFC.org](http://www.IFC.org). We carry out an examination of our export projects' compliance with these standards, and we have not seen any occurrences of violation in the 2013/14 fiscal year.'



**A12:**

**Does the company have contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption?**

**Score:**

**0**

**Comments:**

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

**References:**

Public:  
NA

**A13:**

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

**Score:**

**1**

**Comments:**

Based on public information, there is evidence that the company has a screening process through which they ensure compliance with their ethical standards. However, there is no readily available evidence of contractual terms or the consequences of breaches to their stance on bribery and corruption. The company therefore scores 1.

**References:**

Public:

Annual Report (2013-2014), p.15:

'2. Suppliers Aspirational Goal: To ensure safe working conditions throughout the supply chain, that business operations are environmentally sound, and that business is conducted in accordance with internationally recognized principles for business ethics and human rights. We expect and require that our suppliers, and their supply chain, adhere to the same high standards as Terma.

Activities: To reach the goal, Terma has established a process and procedure in our quality system, which describes the process for compliance with standard business ethics. Any new supplier will be asked to fill out a questionnaire and to provide assurances that they comply. In the spring of 2014, we will start up screening our top 50 suppliers by purchase volume in the 2013/14 fiscal year, since they cover 25% of the total spend. In the 2015/16 fiscal year, we will continue to screen the next group of suppliers by purchase volume and thereby have screened the top 100 by the end of the 2015/16 fiscal year. This constitutes roughly 40% of the purchased volume. The actual screening will provide evidence that suppliers have ethical standards in line with Terma's. This screening also includes new suppliers. With the policy and procedures for the supply chain, it is the opinion of the Management that Terma is compliant with the expected standards of society. It is the belief that we must continue the screening process, and that there will not be any major issues with the existing or future supplier base, since the adequate processes and procedures are well implemented, and therefore any deviations will be disclosed early in the process.'

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[HTTP://WWW.TERMA.COM/](http://www.terma.com/)

**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:

Jane's 360 website: Boeing announces offset agreements ahead of Danish fighter aircraft selection

'Boeing announces offset agreements ahead of Danish fighter aircraft selection'.

'The US corporation said on 30 October that agreements have been reached with Danish Aerotech, Falck Schmidt Defence Systems, IFAD, Multicut, Systematic, and Terma on opportunities from defence and aerospace production to maintenance.'

<http://www.janes.com/article/45206/boeing-announces-offset-agreements-ahead-of-danish-fighter-aircraft-selection>

**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 references for A13a.

**A15:**

**Does the company have an anti-corruption policy that prohibits corruption in its various forms?**

**Score:**

**1**

**Comments:**

Based on public information, there is evidence that the company has an anti-corruption policy that prohibits corruption. However, the policy is not explicit on all the forms that such corruption might take, such as facilitation payments and improper gifts and hospitality. The company therefore scores 1.

**References:**

Public:

Company website: Anti-Corruption

‘Anti-corruption

At Terma we are very dedicated to the fight against bribery and corruption. We do not accept or engage in any corrupt practices. Participation in corruption is an unacceptable and illegal activity that Terma strongly denounces. Furthermore it places employees in both punishable and morally irresponsible situations and has destructive effects on society and the markets that are affected by it. Terma firmly disassociates itself from any kind of bribery and is dedicated to ensuring that the company and Terma employees do not contribute to bribery or other kinds of corruption.’

<http://www.terma-dev.workingpropeople.com/about-us/vision,-values-ethics/anti-corruption/>

Terma Statement on Fight against Corruption:

‘Corruption is an illegal and unacceptable activity, which tarnishes company brands and destroys their future business opportunities and places the employees in punishable and morally irresponsible situations it also has a destructive effect on the societies and markets which are affected by it.

Therefore, Terma strongly dissociates itself from any kind of bribery and works hard to ensure that the company and our employees do not contribute to bribery or other kinds of corruption.

We strongly emphasize that Terma observes national rules against corruption and thus abides by the UN, OECD and the AeroSpace and Defence Industries Association of Europe's (ASD) guidelines on the fight against corruption.

The main aim of the Terma Code of Conduct is to ensure that none of our employees, or others who represent Terma, offer or gain unjust advantages from officials or the company's cooperation partners.

The Terma Code of Conduct describes the values and spirit, which characterize the Terma business methods. The signatures below emphasize to external partners that Terma management and employees are not allowed to and do not want to participate in any kind of corruption.

Jens Maaloe, President and CEO’

**A16:**

**Is the anti-corruption policy explicitly one of zero tolerance?**

**Score:**

**2**

**Comments:**

Based on public information, there is evidence that the company has a zero tolerance policy statement of corruption.

**References:**

Public:

Company website: CSR

'Aspirational goal

The aim of corporate governance at Terma is to build a culture of integrity and ethical behavior in countries where we do business. Our values and principles provide fundamental guidance for our actions and govern the relationship with our employees, customers, suppliers, and communities.

We take pride in our zero tolerance of corruption.'

<http://www.terma.com/about-us/csr/customers/>

**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:**

**1**

**Comments:**

Based on public information, there is evidence that the company's anti-corruption policy is easily accessible to employees, Board members and affiliated organizations via its website. However, its accessibility is limited by the number of languages it is available in. Furthermore, the company's code of conduct is not available on its public website. The company therefore scores 1.

**References:**

Public:

Annual Report (2013-2014), p.15:

'We are dedicated in our fight against corruption, since such practices are morally indefensible and never acceptable. Terma has a "Code of Conduct" that specifies clear rules of engagement. The main objective is to ensure that none of Terma's employees, or others who represent our company, seek to gain unjust advantages from authorities or other cooperation partners. The Code of Conduct has been in place since 2008. It is evaluated on a yearly basis by Terma's Management and is communicated to all employees and external partners.'

Company website: Anti-Corruption

'Anti-corruption

At Terma we are very dedicated to the fight against bribery and corruption. We do not accept or engage in any corrupt practices. Participation in corruption is an unacceptable and illegal activity that Terma strongly denounces. Furthermore it places employees in both punishable and morally irresponsible situations and has destructive effects on society and the markets that are affected by it. Terma firmly disassociates itself from any kind of bribery and is dedicated to ensuring that the company and Terma employees do not contribute to bribery or other kinds of corruption.'



<http://www.terma-dev.workingpropeople.com/about-us/vision,-values-ethics/anti-corruption/>

#### Terma Statement on Fight against Corruption

‘Corruption is an illegal and unacceptable activity, which tarnishes company brands and destroys their future business opportunities and places the employees in punishable and morally irresponsible situations it also has a destructive effect on the societies and markets which are affected by it. Therefore, Terma strongly dissociates itself from any kind of bribery and works hard to ensure that the company and our employees do not contribute to bribery or other kinds of corruption. We strongly emphasize that Terma observes national rules against corruption and thus abides by the UN, OECD and the AeroSpace and Defence Industries Association of Europe's (ASD) guidelines on the fight against corruption.

The main aim of the Terma Code of Conduct is to ensure that none of our employees, or others who represent Terma, offer or gain unjust advantages from officials or the company's cooperation partners. The Terma Code of Conduct describes the values and spirit, which characterize the Terma business methods. The signatures below emphasize to external partners that Terma management and employees are not allowed to and do not want to participate in any kind of corruption.

Jens Maaloe, President and CEO’.

**A17(a):**

**Is the company's anti-corruption policy easily understandable and clear to Board members, employees and third parties?**

**Score:**

**2**

**Comments:**

Based on public information, there is evidence that the company's anti-corruption policy is written in accessible, comprehensible language.

**References:**

Public:

Company website: Anti-Corruption

'Anti-corruption

At Terma we are very dedicated to the fight against bribery and corruption. We do not accept or engage in any corrupt practices. Participation in corruption is an unacceptable and illegal activity that Terma strongly denounces. Furthermore it places employees in both punishable and morally irresponsible situations and has destructive effects on society and the markets that are affected by it. Terma firmly disassociates itself from any kind of bribery and is dedicated to ensuring that the company and Terma employees do not contribute to bribery or other kinds of corruption.'

<http://www.terma-dev.workingpropeople.com/about-us/vision,-values-ethics/anti-corruption/>

Terma Statement on Fight against Corruption:

'Corruption is an illegal and unacceptable activity, which tarnishes company brands and destroys their future business opportunities and places the employees in punishable and morally irresponsible situations it also has a destructive effect on the societies and markets which are affected by it. Therefore, Terma strongly dissociates itself from any kind of bribery and works hard to ensure that the company and our employees do not contribute to bribery or other kinds of corruption. We strongly emphasize that Terma observes national rules against corruption and thus abides by the UN, OECD and the AeroSpace and Defence Industries Association of Europe's (ASD) guidelines on the fight against corruption.

The main aim of the Terma Code of Conduct is to ensure that none of our employees, or

others who represent Terma, offer or gain unjust advantages from officials or the company's cooperation partners. The Terma Code of Conduct describes the values and spirit, which characterize the Terma business methods. The signatures below emphasize to external partners that Terma management and employees are not allowed to and do not want to participate in any kind of corruption.

Jens Maaloe, President and CEO'

**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 that the anti-corruption policy applies to all employees and management of the company and external affiliates; however, Board members are not explicitly mentioned. The company therefore scores 1.

**References:**

Public:

Company website: Anti-Corruption

'Anti-corruption

Terma firmly disassociates itself from any kind of bribery and is dedicated to ensuring that the company and Terma employees do not contribute to bribery or other kinds of corruption.'

<http://www.terma-dev.workingpropeople.com/about-us/vision,-values-ethics/anti-corruption/>

Terma Statement on Fight against Corruption:

'The main aim of the Terma Code of Conduct is to ensure that none of our employees, or others who represent Terma, offer or gain unjust advantages from officials or the company's cooperation partners. The Terma Code of Conduct describes the values and spirit, which characterize the Terma business methods. The signatures below emphasize to external partners that Terma management and employees are not allowed to and do not want to participate in any kind of corruption.

Jens Maaloe, President and CEO'

**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 that applies to both employees and Board members.

**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:  
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, 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:**

**0**

**Comments:**

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

**References:**

Public:

NA

**A28:**

**Is anti-corruption training provided in all countries where the company operates or has company sites?**

**Score:**

**0**

**Comments:**

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

**References:**

Public:  
NA

**A29:**

**Does the company provide targeted anti-corruption training to members of the Board?**

**Score:**

**0**

**Comments:**

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

**References:**

Public:  
NA

**A30:**

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

**Score:**

**0**

**Comments:**

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

**References:**

Public:  
NA



**A31:**

**Does the company have a clear and formal process by which employees declare conflicts of interest?**

**Score:**

**0**

**Comments:**

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

**References:**

Public:  
NA

**A32:**

**Is the company explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities?**

**Score:**

**0**

**Comments:**

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

**References:**

Public:

NA

**A33:**

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

**Score:**

**0**

**Comments:**

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

**References:**

Public:  
NA

**A33(a):**

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

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company has whistleblowing channels available to all employees in all geographies.

**References:**

Public:  
NA

**A33(b):**

**Does the company have formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively?**

**Score:**

**0**

**Comments:**

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

**References:**

Public:  
NA

**A34:**

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

**Score:**

**0**

**Comments:**

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

**References:**

Public:  
NA

**A35:**

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

**Score:**

**0**

**Comments:**

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

**References:**

Public:  
NA

**Information Sources:**

**Company Website:**

<http://www.terma.com/>

**Company Website, Anti-Corruption:**

<http://www.terma-dev.workingpropeople.com/about-us/vision,-values-ethics/anti-corruption/>

**Annual Report (2013-2014):**

<http://www.terma.com/about-us/reports/annual-report/>

**Terma Statement on Fight against Corruption:**

<http://www.terma.com/media/24453/anti-corruption.pdf>

**Terma's Values Flyer:**

<http://www.terma.com/media/49932/ourvaluesflyer.pdf>