

# DEFENCE COMPANIES INDEX (DCI) ON ANTI-CORRUPTION AND CORPORATE TRANSPARENCY 2020

## FINAL ASSESSMENT

### BATTELLE MEMORIAL INSTITUTE

The following pages contain the detailed scoring for this company based on publicly available information.

The table below shows a summary of the company's scores per section:

Section	Number of Questions*	Score Based on Publicly Available Information
1. Leadership and Organisational Culture	4	0/8
2. Internal Controls	6	2/12
3. Support to Employees	7	2/14
4. Conflict of Interest	4	0/8
5. Customer Engagement	5	0/10
6. Supply Chain Management	5	0/10
7. Agents, Intermediaries and Joint Ventures	3	0/6
8. Offsets	0	N/A
9. High Risk Markets	1	0/2
10. State-Owned Enterprises	0	N/A
<b>TOTAL</b>		<b>4 / 70</b>
<b>BAND</b>		<b>F</b>

\*This column represents the number of questions on which the company was eligible to receive a score; i.e. where the company did not receive a score of N/A.

## 1. Leadership and Organisational Culture

Question
<p><b>1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?</b></p>
Score
<p><b>0</b></p>
Comments
<p>The institute has a publicly stated commitment to 'integrity' and 'high ethical standards' but does not explicitly mention anti-bribery and corruption. There is no direct evidence that this statement is authorised and supported by the institute's leadership.</p>
Evidence
<p><b>[1] Our Commitment (Webpage)</b>                  Accessed 02/08/2019  <a href="https://secure.ethicspoint.com/domain/media/en/gui/50019/index.html">https://secure.ethicspoint.com/domain/media/en/gui/50019/index.html</a>                  Battelle Memorial Institute Inc is an organization with strong values of responsibility and integrity. Our Code of Business Conduct and Ethics contains general guidelines for conducting business with the highest standards of ethics.</p>

<b>Question</b>
<p><b>1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories:</b></p> <p><b>a) All employees, including staff and leadership of subsidiaries and other controlled entities;</b></p> <p><b>b) All board members, including non-executive directors.</b></p>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>There is no publicly available evidence that the institute has an anti-bribery and corruption policy. The institute appears to have a Code of Business Conduct and Ethics, however this document is not publicly accessible so it is not possible to determine whether this covers anti-bribery and corruption.</p>
<b>Evidence</b>
<p><b>[1] Our Commitment (Webpage)</b>                  Accessed 02/08/2019  <a href="https://secure.ethicspoint.com/domain/media/en/gui/50019/index.html">https://secure.ethicspoint.com/domain/media/en/gui/50019/index.html</a>                  Battelle Memorial Institute Inc is an organization with strong values of responsibility and integrity. Our Code of Business Conduct and Ethics contains general guidelines for conducting business with the highest standards of ethics.</p> <p>Battelle Memorial Institute Inc is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in approaching your supervisor or management in instances where you believe violations of policies or standards have occurred.</p> <p>If you are not comfortable speaking with management, the concern involves management or you prefer your identity not be associated with the reported concern, you are encouraged to use this hotline, hosted by a third party hotline provider, EthicsPoint. You are encouraged to submit reports relating to violations stated in our Code of Business Conduct and Ethics, safety and regulatory compliance, circumvention of internal controls, as well as asking for guidance related to policies and procedures.</p> <p><b>[2] Ethics Point Reporting Structure (Webpage)</b>                  Accessed 02/08/2019  <a href="https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=50019&amp;locationid=21260725&amp;override=yes&amp;agreement=no&amp;companyname=Battelle%20Memorial%20Institute%20Inc">https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=50019&amp;locationid=21260725&amp;override=yes&amp;agreement=no&amp;companyname=Battelle%20Memorial%20Institute%20Inc</a>                  Violations of the FCPA include (i) bribery of a foreign official (including persons employed directly by a foreign government, persons employed by commercial enterprises owned or controlled by foreign governments and private persons who have responsibilities similar to those of governmental employees) and (ii) making false or misleading entries on a company's books for any purpose.</p>

<b>Question</b>
<b>1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the institute has a designated board committee or individual board member responsible for its anti-bribery and corruption programme.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>1.4. Is responsibility for implementing and managing the company’s anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company’s programme?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that a specific managerial-level employee has ultimate responsibility for implementing and managing the institute’s anti-bribery and corruption programme.
<b>Evidence</b>
No evidence found.

## 2. Internal Controls

<b>Question</b>
2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the institute has a formal risk assessment procedure which is used to inform its anti-bribery and corruption programme.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>2.2. Is the company's anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the institute's anti-bribery and corruption programme is subject to audit or review.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is some evidence that the institute commits to investigate ethical allegations and incidents and that a specific procedure is in place to deal with those reported through its whistleblowing channel. There is evidence that the institute takes steps to ensure the independence of investigations through the use of an external reporting channel and the establishment of a regular investigative committee formed of multiple individuals.</p> <p>However, the institute receives a score of '1' because it does not provide further details of its investigative procedure, from receipt to final outcome, and does not specifically mention allegations or incidents relating to bribery or corruption. There is also no evidence that information on each investigation is documented at each stage.</p>
<b>Evidence</b>
<p><b>[1] Our Commitment (Webpage)</b>                  Accessed 02/08/2019  <a href="https://secure.ethicspoint.com/domain/media/en/gui/50019/index.html">https://secure.ethicspoint.com/domain/media/en/gui/50019/index.html</a>                  Battelle Memorial Institute Inc is an organization with strong values of responsibility and integrity. Our Code of Business Conduct and Ethics contains general guidelines for conducting business with the highest standards of ethics.</p> <p>Battelle Memorial Institute Inc is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in approaching your supervisor or management in instances where you believe violations of policies or standards have occurred.</p> <p>If you are not comfortable speaking with management, the concern involves management or you prefer your identity not be associated with the reported concern, you are encouraged to use this hotline, hosted by a third party hotline provider, EthicsPoint. You are encouraged to submit reports relating to violations stated in our Code of Business Conduct and Ethics, safety and regulatory compliance, circumvention of internal controls, as well as asking for guidance related to policies and procedures.</p> <p>The information you provide will be sent to us by EthicsPoint on a totally confidential and, if you should choose, anonymous basis. You have our guarantee that your comments will be heard.</p> <p><b>[4] Frequently Asked Questions - EthicsPoint (Document)</b>                  Accessed 02/08/2019  <a href="https://secure.ethicspoint.com/domain/media/en/gui/50019/faq.pdf">https://secure.ethicspoint.com/domain/media/en/gui/50019/faq.pdf</a></p> <p>[p.2] Where do these reports go? Who can access them?                  Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to the Investigation Oversight Committee (IOC) and their back-ups. The IOC consists of the SVP General Counsel, SVP Human Resources, and the Chief Audit Executive. They will evaluate the report and determine the most appropriate way to proceed. All individuals, including anyone assigned to investigate the report, has had training in keeping the reports and all related information in the utmost confidence.</p> <p>[p.4] I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?                  The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...". Additionally, when a report is investigated, the investigators exercise great care in maintaining confidentiality when interviewing a reporter, management, witnesses and the subject of the report.</p> <p>[p.5] What if my boss or other managers are involved in a violation?                  Won't they get the report and start a cover-up? The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named. Additionally, the</p>



reports are delivered to a cross-function oversight group (Investigation Oversight Committee) including Legal, HR and Internal Audit to ensure objectivity and independence in addressing all reports.

<b>Question</b>
<b>2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is some evidence that the institute takes steps to ensure the quality of its investigations. It states that all staff tasked with conducting investigations are properly trained to perform the function and indicates that the Investigation Oversight Committee is composed of appropriate senior individuals.</p> <p>However, the institute receives a score of '1' because there is no evidence of a procedure to handle complaints about the investigation process, nor is there evidence that the institute reviews its investigations procedure at least every three years or in response to any changes in the regulatory environment.</p>
<b>Evidence</b>
<p><b>[4] Frequently Asked Questions - EthicsPoint (Document)</b>                  Accessed 02/08/2019  <a href="https://secure.ethicspoint.com/domain/media/en/gui/50019/faq.pdf">https://secure.ethicspoint.com/domain/media/en/gui/50019/faq.pdf</a></p> <p>[p.2] Where do these reports go? Who can access them?                  Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to the Investigation Oversight Committee (IOC) and their back-ups. The IOC consists of the SVP General Counsel, SVP Human Resources, and the Chief Audit Executive. They will evaluate the report and determine the most appropriate way to proceed. All individuals, including anyone assigned to investigate the report, has had training in keeping the reports and all related information in the utmost confidence.</p> <p>[p.5] What if my boss or other managers are involved in a violation?                  Won't they get the report and start a cover-up? The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named. Additionally, the reports are delivered to a cross-function oversight group (Investigation Oversight Committee) including Legal, HR and Internal Audit to ensure objectivity and independence in addressing all reports.</p>

<b>Question</b>
<b>2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the institute's investigative procedure includes a commitment to report material findings to the board and, if necessary, to the relevant authorities.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the institute publishes any data on ethical or bribery and corruption investigations or disciplinary actions involving its employees.
<b>Evidence</b>
No evidence found.

### 3. Support to Employees

<b>Question</b>
3.1. Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the institute provides anti-bribery and corruption training to all employees.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<p><b>3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees:</b></p> <ul style="list-style-type: none"> <li>a) Employees in high risk positions,</li> <li>b) Middle management,</li> <li>c) Board members.</li> </ul>
<b>Score</b>
0
<b>Comments</b>
<p>There is no evidence that the institute tailors its anti-bribery and corruption training to employees based on an assessment of their role and exposure to corruption risk.</p>
<b>Evidence</b>
<p>No evidence found.</p>

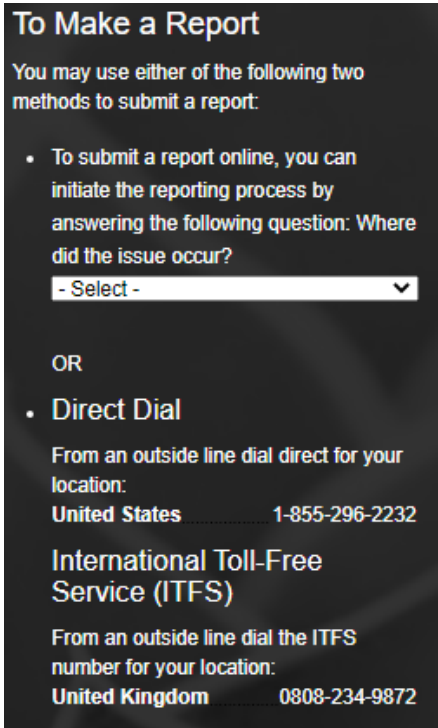
<b>Question</b>
<b>3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the institute measures or reviews the effectiveness of its anti-bribery and corruption communications and training programme.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the institute's incentive schemes incorporate ethical or anti-bribery and corruption principles.
<b>Evidence</b>
No evidence found.



<b>Question</b>
<b>3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>There is some evidence that the institute aims to promote an ethical culture in the workplace, however it does not provide sufficiently clear evidence that it will support and protect employees who refuse to act unethically, even where it might result in a disadvantage or loss of business. There is also no evidence that the company takes steps to assure itself of employees' belief in this commitment through surveys or other means.</p>
<b>Evidence</b>
<p><b>[4] Frequently Asked Questions - EthicsPoint (Document)</b>                  Accessed 02/08/2019  <a href="https://secure.ethicspoint.com/domain/media/en/gui/50019/faq.pdf">https://secure.ethicspoint.com/domain/media/en/gui/50019/faq.pdf</a></p> <p>[p.2] Does management really want me to report?                  We certainly do. In fact, we need you to report. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potentially negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.</p> <p>Isn't this system just an example of someone watching over me?                  The EthicsPoint system concentrates on being a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.</p> <p>We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.</p> <p>[p.5] I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?                  File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.</p> <p><b>[1] Our Commitment (Webpage)</b>                  Accessed 02/08/2019  <a href="https://secure.ethicspoint.com/domain/media/en/gui/50019/index.html">https://secure.ethicspoint.com/domain/media/en/gui/50019/index.html</a></p> <p>Battelle Memorial Institute Inc is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in approaching your supervisor or management in instances where you believe violations of policies or standards have occurred.</p> <p>[...] You are encouraged to submit reports relating to violations stated in our Code of Business Conduct and Ethics, safety and regulatory compliance, circumvention of internal controls, as well as asking for guidance related to policies and procedures.</p>

<b>Question</b>
<b>3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is evidence that the institute promotes a policy of non-retaliation against whistleblowers and employees who report compliance incidents. However, the institute receives a score of '0' because it is not clear whether this policy applies to all employees across the organisation, including those employed by the group as third parties, suppliers and/or joint venture partners.
<b>Evidence</b>
<p><b>[2] Ethics Point Reporting Structure (Webpage)</b>                  Accessed 02/08/2019  <a href="https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=50019&amp;locationid=21260725&amp;override=yes&amp;agreement=no&amp;companyname=Battelle%20Memorial%20Institute%20Inc">https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=50019&amp;locationid=21260725&amp;override=yes&amp;agreement=no&amp;companyname=Battelle%20Memorial%20Institute%20Inc</a></p> <p><b>Retaliation</b>                  Any adverse action taken against an employee for filing a complaint or supporting another employee's complaint through the Ethics Hotline, to Management, regulatory agencies or any other legal body.</p>

<b>Question</b>
<b>3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that the institute provides several channels through which to report instances of suspected corrupt activity and seek advice on its Code of Business Conduct and Ethics. Channels are sufficiently varied to allow the employee to raise concerns across the management chain and to an independent third party, through the provision of an externally-operated hotline. These channels allow for confidential and, wherever possible, anonymous reporting. This platform is available and accessible to employees in any jurisdiction through the online reporting system or international telephone service, and there is evidence that reports can be made in all relevant languages.</p>
<b>Evidence</b>
<p><b>[1] Our Commitment (Webpage)</b>                  Accessed 02/08/2019  <a href="https://secure.ethicspoint.com/domain/media/en/gui/50019/index.html">https://secure.ethicspoint.com/domain/media/en/gui/50019/index.html</a>                  Battelle Memorial Institute Inc is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in approaching your supervisor or management in instances where you believe violations of policies or standards have occurred.</p> <p>If you are not comfortable speaking with management, the concern involves management or you prefer your identity not be associated with the reported concern, you are encouraged to use this hotline, hosted by a third party hotline provider, EthicsPoint. You are encouraged to submit reports relating to violations stated in our Code of Business Conduct and Ethics, safety and regulatory compliance, circumvention of internal controls, as well as asking for guidance related to policies and procedures.</p> <p>The information you provide will be sent to us by EthicsPoint on a totally confidential and, if you should choose, anonymous basis. You have our guarantee that your comments will be heard.</p> 

**[4] Frequently Asked Questions - EthicsPoint (Document)**

Accessed 02/08/2019

<https://secure.ethicspoint.com/domain/media/en/gui/50019/faq.pdf>

[p.2] May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it? When you observe some behavior that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report confidentially and/or anonymously than keep the information to yourself.

[p.3] Isn't this system just an example of someone watching over me?

The EthicsPoint system concentrates on being a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

No. Ethics Point is a positive tool to allow you to provide vital information to Battelle with regards to violations of the Code of Conduct or other compliance issues in a safe, confidential, and when necessary anonymous, manner. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

[p.4] Can I file a report from home and still remain anonymous?

Yes, with any report you make, you have the option to remain anonymous. A report from home, a neighbor's computer, or any Internet portal will remain secure and, when chosen, anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...". Additionally, when a report is investigated, the investigators exercise great care in maintaining confidentiality when interviewing a reporter, management, witnesses and the subject of the report.

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish. If you chose to identify yourself, the investigators will exercise great care in keeping your identity confidential.

[p.5] Are these follow-ups on reports as secure as the first one? All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

[p.6] Can I still file a report if I don't have access to the Internet?

If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year. Additionally, you can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers

## 4. Conflict of Interest

<b>Question</b>
<b>4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>There is evidence that the institute recognises the potential risks posed by conflicts of interest by listing it as a reporting category on the EthicsPoint portal and providing a broad definition. However, the institute receives a score of '0' because there is no evidence that the company has a formal policy on conflicts of interest that covers those actual, potential and perceived, as well as those stemming from certain relationships (e.g. government, financial, etc.).</p>
<b>Evidence</b>
<p><b>[2] Ethics Point Reporting Structure (Webpage)</b>                  Accessed 02/08/2019  <a href="https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=50019&amp;locationid=21260725&amp;override=yes&amp;agreement=no&amp;companyname=Battelle%20Memorial%20Institute%20Inc">https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=50019&amp;locationid=21260725&amp;override=yes&amp;agreement=no&amp;companyname=Battelle%20Memorial%20Institute%20Inc</a>                  A conflict of interest is defined as a situation in which a person, such as a public official, an employee, or a professional, has a private or personal interest sufficient to appear to influence the objective exercise of his or her official duties. (Examples include: inappropriate vendor relations, bribery, misuse of confidential information, inappropriate customer relations).</p>

<b>Question</b>
4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the institute has procedures in place to manage conflicts of interest or their oversight.
<b>Evidence</b>
No evidence found.

<b>Question</b>
4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the institute has a policy regulating the employment of current or former public officials.
<b>Evidence</b>
No evidence found.

<b>Question</b>
4.4. Does the company report details of the contracted services of serving politicians to the company?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the institute reports details of the contracted services of serving politicians.
<b>Evidence</b>
No evidence found.



## 5. Customer Engagement

### 5.1 Contributions, Donations and Sponsorships

<b>Question</b>
5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?
<b>Score</b>
N/A
<b>Comments</b>
There is no readily available evidence that the institute is able to make political contributions due to its nature as a non-profit, tax-exempt organisation in the United States of America.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?</b>
<b>Score</b>
<b>N/A</b>
<b>Comments</b>
There is no readily available evidence that the institute is able to make political contributions due to its nature as a non-profit, tax-exempt organisation in the United States of America.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the institute has a policy or procedure to address the potential bribery and corruption risks arising from charitable donations and sponsorships. The institute publishes some information about type of organisations that it sponsors and provides an estimate figure of the amount it donates annually, but this information is insufficiently detailed to receive a score of '1'.
<b>Evidence</b>
<p><b>[2] Charitable Giving (Webpage)</b>                  Accessed 02/08/2019  <a href="https://www.battelle.org/about-us/charitable-giving">https://www.battelle.org/about-us/charitable-giving</a>                  Charitable Giving</p> <p>Battelle is a nonprofit charitable trust that gives \$8 million to \$11 million annually to philanthropic organizations. We are strategic with our donations and target the majority of funds to STEM (science, technology, engineering and math) education initiatives that can make the greatest impact. We also invest in civic and community causes that are important to the communities where we live and work.</p> <p>Columbus, Ohio has a special place in our company’s heart – it’s where we were founded and where our headquarters remain today – so two-thirds of our total annual giving remain in Central Ohio.</p> <p>How We Give</p> <p>Education – Funding for education programming aligned to our strategic education objectives is made available through Battelle’s STEM Grant Program.</p> <p>Civic &amp; Community – Funding proposals for civic and community causes are reviewed by Battelle’s philanthropy employees and a Charitable Distribution Review Committee. We consider industry-standard evaluation metrics, including the financial health of the organization and community need. The application period is currently closed.</p> <p>Charitable Event Sponsorship – Due to the large number of fundraising events, Battelle chooses to sponsor only a small number of carefully selected charitable events throughout the year.</p>

## 5.2 Lobbying

<b>Question</b>
5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the institute has a policy or procedure on lobbying.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the institute publishes any information on its lobbying aims, topics or activities.
<b>Evidence</b>
No evidence found.

<b>Question</b>
5.2.3 Does the company publish full details of its global lobbying expenditure?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the institute provides any details about its global lobbying expenditure.
<b>Evidence</b>
No evidence found.

### 5.3 Gifts and Hospitality

<b>Question</b>
<b>5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is some evidence that the institute recognises the potential risks posed by gifts and hospitality by listing it as a reporting category on the EthicsPoint portal and providing a broad definition. However, the institute receives a score of '0' because there is no evidence that the company has a formal policy on the giving and receiving of gifts and hospitality to ensure that such promotional expenses are not used as vehicles for bribery and corruption.
<b>Evidence</b>
<p><b>[2] Ethics Point Reporting Structure (Webpage)</b>                  Accessed 02/08/2019  <a href="https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=50019&amp;locationid=21260725&amp;override=yes&amp;agreement=no&amp;companyname=Battelle%20Memorial%20Institute%20Inc">https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=50019&amp;locationid=21260725&amp;override=yes&amp;agreement=no&amp;companyname=Battelle%20Memorial%20Institute%20Inc</a>                  Gifts and Entertainment                  Refers to the inappropriate offering, solicitation or accepting of items of more than nominal value from vendors, customers or other third parties in a capacity as an employee of the Company.</p>

## 6. Supply Chain Management

<b>Question</b>
6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the institute requires the involvement of its procurement department in the establishment and oversight of its supplier base.
<b>Evidence</b>
No evidence found.



<b>Question</b>
<b>6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the institute conducts anti-bribery and corruption due diligence on its supply chain.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is evidence that the institute requires that its suppliers meet a certain standard of ethical business conduct, but the institute does not specifically refer to any of the anti-bribery and corruption measures necessary to score '1'.
<b>Evidence</b>
<p><b>[5] Supplier Portal – Frequently Asked Questions (Document)</b>                  Accessed 02/08/2019  <a href="https://battelle.suppliergateway.com/FAQ/FAQSupplierDiversityPortal.pdf">https://battelle.suppliergateway.com/FAQ/FAQSupplierDiversityPortal.pdf</a></p> <p>[p.1] What does Battelle look for in a supplier?                  Battelle considers many factors when determining team composition or making purchasing decisions. These decisions may vary depending upon priorities and requirements, including:</p> <ul style="list-style-type: none"> <li>• Core capabilities, product or services offering resource availability, and ability to recruit qualified candidates</li> <li>• Geographic location or customer proximity</li> <li>• Organizational Conflicts of Interest (OCI)</li> <li>• Past performance and reputation</li> <li>• Personnel experience</li> <li>• Dependability, responsiveness and teamwork</li> <li>• Market niche</li> <li>• Core capabilities</li> </ul> <p>Additionally, we expect suppliers to demonstrate the following (business units may have additional special technical or quality requirements unique to their environment):</p> <ul style="list-style-type: none"> <li>• Financial viability</li> <li>• High ethical standards</li> <li>• Competitive pricing</li> <li>• Appropriate industry quality procedures and processes</li> <li>• [p.2] Cost reduction program</li> <li>• Cycle time reduction program</li> <li>• Ability to offer a technological or service advantage over competitors</li> <li>• Innovations in the delivery of goods or services (to include applying e-commerce, EDI, etc.)</li> </ul>

<b>Question</b>
<b>6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the institute takes steps to ensure that the substance of its anti-bribery and corruption programme and standards are required throughout the supply chain.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the institute publishes any data on ethical or anti-bribery and corruption investigations relating to its suppliers, or the associated disciplinary actions.
<b>Evidence</b>
No evidence found.

## 7. Agents, Intermediaries and Joint Ventures

### 7.1 Agents and Intermediaries

<b>Question</b>
7.1.1 Does the company have a clear policy on the use of agents?
<b>Score</b>
N/A
<b>Comments</b>
There is no readily available evidence that the institute engages agents in the conduct of business due to its nature as a non-profit organisation.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries?</b>
<b>Score</b>
<b>N/A</b>
<b>Comments</b>
There is no readily available evidence that the institute engages agents in the conduct of business due to its nature as a non-profit organisation.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?</b>
<b>Score</b>
<b>N/A</b>
<b>Comments</b>
There is no readily available evidence that the institute engages agents in the conduct of business due to its nature as a non-profit organisation.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>7.1.4 Does the company’s anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?</b>
<b>Score</b>
<b>N/A</b>
<b>Comments</b>
There is no readily available evidence that the institute engages agents in the conduct of business due to its nature as a non-profit organisation.
<b>Evidence</b>
No evidence found.



<b>Question</b>
<b>7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices?</b>
<b>Score</b>
<b>N/A</b>
<b>Comments</b>
There is no readily available evidence that the institute engages agents in the conduct of business due to its nature as a non-profit organisation.
<b>Evidence</b>
No evidence found.

<b>Question</b>
7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company?
<b>Score</b>
N/A
<b>Comments</b>
There is no readily available evidence that the institute engages agents in the conduct of business due to its nature as a non-profit organisation.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?</b>
<b>Score</b>
N/A
<b>Comments</b>
There is no readily available evidence that the institute engages agents in the conduct of business due to its nature as a non-profit organisation.
<b>Evidence</b>
No evidence found.

## 7.2 Joint Ventures

<b>Question</b>
7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the institute conducts anti-bribery and corruption due diligence on its joint ventures.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture relationships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the institute commits to establishing or implementing anti-bribery and corruption policies or procedures in its joint ventures; it does not require anti-bribery and corruption clauses in its contracts with joint venture partners.
<b>Evidence</b>
No evidence found.

<b>Question</b>
7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the institute commits to take an active role in preventing bribery and corruption in its joint ventures.
<b>Evidence</b>
No evidence found.

## 8. Offsets

<b>Question</b>
<b>8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?</b>
<b>Score</b>
N/A
<b>Comments</b>
There is no readily available evidence that the institute engages in offset contracting.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?</b>
<b>Score</b>
<b>N/A</b>
<b>Comments</b>
There is no readily available evidence that the institute engages in offset contracting.
<b>Evidence</b>
No evidence found.



<b>Question</b>
<b>8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?</b>
<b>Score</b>
<b>N/A</b>
<b>Comments</b>
There is no readily available evidence that the institute engages in offset contracting.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>8.4 Does the company publish details about the beneficiaries of its indirect offset projects?</b>
<b>Score</b>
N/A
<b>Comments</b>
There is no readily available evidence that the institute engages in offset contracting.
<b>Evidence</b>
No evidence found.

## 9. High Risk Markets

<b>Question</b>
9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?
<b>Score</b>
N/A
<b>Comments</b>
There is no readily available evidence that the institute is engaged in supplying goods or services, nor that it operates in markets or jurisdictions outside of the United States of America.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the institute publishes a list of its subsidiaries or affiliated entities.
<b>Evidence</b>
No evidence found.

<b>Question</b>
9.3 Does the company disclose its beneficial ownership and control structure?
<b>Score</b>
N/A
<b>Comments</b>
The institute is a non-profit organisation and therefore does not have shareholders.
<b>Evidence</b>
<p><b>[6] Newsroom (Webpage)</b>                  Accessed 29/06/2020  <a href="https://www.battelle.org/newsroom">https://www.battelle.org/newsroom</a>                  Fast Facts                  [...]</p> <ul style="list-style-type: none"> <li>• Battelle is the largest, private, non-profit research and development organization in the world.</li> </ul>

<b>Question</b>
9.4 Does the company publish a percentage breakdown of its defence sales by customer?
<b>Score</b>
N/A
<b>Comments</b>
There is no readily available evidence that the company engages in commercial or industry sales in the defence sector.
<b>Evidence</b>
No evidence found.

## 10. State-Owned Enterprises (SOEs)

<b>Question</b>
10.1 Does the SOE publish a breakdown of its shareholder voting rights?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
<b>10.2 Are the SOE's commercial and public policy objectives publicly available?</b>
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>



<b>Question</b>
<b>10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?</b>
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
10.4 Is the SOE's audit committee composed of a majority of independent directors?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

## List of Evidence & Sources

No.	Type (Webpage or Document)	Name	Download Date	Link
01	Webpage	Our Commitment	02/08/2019	<a href="https://secure.ethicspoint.com/domain/media/en/gui/50019/index.html">https://secure.ethicspoint.com/domain/media/en/gui/50019/index.html</a>
02	Webpage	Ethics Point Reporting Structure	02/08/2019	<a href="https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=50019&amp;locationid=21260725&amp;override=yes&amp;agreement=no&amp;companyname=Battelle%20Memorial%20Institute%20Inc">https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=50019&amp;locationid=21260725&amp;override=yes&amp;agreement=no&amp;companyname=Battelle%20Memorial%20Institute%20Inc</a>
03	Webpage	Charitable Giving	02/08/2019	<a href="https://www.battelle.org/about-us/charitable-giving">https://www.battelle.org/about-us/charitable-giving</a>
04	Document	Frequently Asked Questions - EthicsPoint	02/08/2019	<a href="https://secure.ethicspoint.com/domain/media/en/gui/50019/faq.pdf">https://secure.ethicspoint.com/domain/media/en/gui/50019/faq.pdf</a>
05	Document	Supplier Portal – Frequently Asked Questions	02/08/2019	<a href="https://battelle.suppliergateway.com/FAQ/FAQSupplierDiversityPortal.pdf">https://battelle.suppliergateway.com/FAQ/FAQSupplierDiversityPortal.pdf</a>
06	Webpage	Newsroom	29/06/2020	<a href="https://www.battelle.org/newsroom">https://www.battelle.org/newsroom</a>