

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

FINAL ASSESSMENT

PT DIRGANTARA INDONESIA (INDONESIAN AEROSPACE)

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
Leadership and Organisational Culture	4	0/8
2. Internal Controls	6	0/12
3. Support to Employees	7	0/14
4. Conflict of Interest	4	0/8
5. Customer Engagement	7	0/14
6. Supply Chain Management	5	0/10
7. Agents, Intermediaries and Joint Ventures	10	0/20
8. Offsets	4	0/8
9. High Risk Markets	4	2/8
10. State-Owned Enterprises	5	1/10
TOTAL		3/112
BAND		F

^{*}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
1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?
Score
0
Comments
There is no evidence that the company makes a public commitment to ethical or anti-bribery and corruption standards.
Evidence
No evidence found.



1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories:

both of the following categories: a) All employees, including staff and leadership of subsidiaries and other controlled entities; b) All board members, including non-executive directors.
Score
0
Comments
There is no publicly available evidence that the company has an anti-bribery and corruption policy.
Evidence
No evidence found.



1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?

Score

0

Comments

There is no evidence that the company has a designated board committee or individual board member responsible for its anti-bribery and corruption programme.

Evidence



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?

Score

O

Comments

There is no evidence that a specific senior individual or managerial-level employee has ultimate responsibility for implementing and managing the company's anti-bribery and corruption programme.

Evidence



2. Internal Controls

Question

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?

Score

0

Comments

There is no publicly available evidence that the company has a formal risk assessment procedure that is used to inform the company's anti-bribery and corruption programme.

Evidence



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?

Score

0

Comments

There is no publicly available evidence that the company's anti-bribery and corruption programme is subject to audit or review.

Evidence



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?

Score

0

Comments

There is no evidence that the company has a publicly stated procedure for dealing with bribery and corruption allegations, incidents or whistleblowing reports.

Evidence



Question
2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?
Score
0
Comments
There is no evidence that the company assures itself of the quality of its internal investigations.
Evidence
No evidence found.



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?

Score

0

Comments

There is no evidence that the company publicly commits to report material findings of internal investigations to its board or the relevant authorities.

Evidence



2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees?

Score

0

Comments

There is no evidence that the company publishes any data on ethical or bribery and corruption investigations or disciplinary actions involving its employees.

Evidence



3. Support to Employees

Question
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?
Score
0
Comments
There is no publicly available evidence that the company provides anti-bribery and corruption training to its employees.
Evidence
No evidence found.



- 3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees:
 - a) Employees in high risk positions,
 - b) Middle management,
 - c) Board members.

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Comments

There is no evidence that the company provides tailored anti-bribery and corruption training to its employees based on an assessment of their role and exposure to corruption risk.

Evidence



3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?

Score

0

Comments

There is no evidence that the company measures or reviews the efficacy of its anti-bribery and corruption communications or training programme.

Evidence



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?

Score

0

Comments

There is no evidence that the company's incentive schemes for employees incorporate ethical or anti-bribery and corruption principles.

Evidence



Question
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?
Score
0
Comments
There is no evidence that the company commits to support or protect employees who refuse to act unethically.
Evidence
No evidence found.



3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?

Score

0

Comments

There is no publicly available evidence that the company has a policy of non-retaliation against whistleblowers or employees who report bribery and corruption incidents.

Evidence



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?

Score

O

Comments

There is no evidence that the company provides whistleblowing or advice channels for its employees to raise concerns or seek advice about the its anti-bribery and corruption programme.

Evidence



4. Conflict of Interest

Question
4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?
Score
0
Comments
There is no publicly available evidence that the company has a policy on conflicts of interest.
Evidence
No evidence found.



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?

Score

n

Comments

There is no publicly available evidence that the company has procedures in place to identify, manage and declare conflicts of interest.

Evidence



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



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



5. Customer Engagement

5.1 Contributions, Donations and Sponsorships

Question
5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?
Score
0
Comments
There is no publicly available evidence that the company has a policy on corporate political contributions.
Evidence
No evidence found.



Question
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?
Score
0
Comments
There is no evidence that the company publishes any details of its political contributions.
Evidence
No evidence found.



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?

Score

n

Comments

There is no publicly available evidence that the company has a policy and/or procedure covering charitable donations or sponsorships.

Evidence



5.2 Lobbying

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



Score Comments There is no evidence that the company publishes any information on its lobbying aims, topics or activities. Evidence No evidence found.



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



5.3 Gifts and Hospitality

Question
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?
Score
0
Comments
There is no publicly available evidence that the company has a policy on gifts or hospitality.
Evidence
No evidence found.



6. Supply Chain Management

Question
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?
Score
0
Comments
There is no publicly available evidence that the company requires the involvement of its procurement department in the establishment or oversight of its supplier base.
Evidence
No evidence found.



6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or reengaging with its suppliers?

Score

O

Comments

There is no publicly available evidence that the company conducts anti-bribery and corruption due diligence on its supply chain.

Evidence



6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?

Score

0

Comments

There is no evidence that the company takes steps to ensure that its suppliers have anti-bribery and corruption policies in place that meet a high standard.

Evidence



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?

Score

n

Comments

There is no evidence that the company takes steps to ensure that the substance of its anti-bribery and corruption programme and standards are required throughout the supply chain.

Evidence



6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?

Score

n

Comments

There is no evidence that the company publishes any data on ethical or anti-bribery and corruption investigations, or the associated disciplinary actions, relating to its suppliers.

Evidence



7. Agents, Intermediaries and Joint Ventures

7.1 Agents and Intermediaries

Question
7.1.1 Does the company have a clear policy on the use of agents?
Score
0
Comments
There is no publicly available evidence that the company has a clear policy on the use of agents.
Evidence
No evidence found.



7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries?

Score

0

Comments

There is no publicly available evidence that the company conducts anti-bribery and corruption due diligence on its agents or intermediaries.

Evidence



Question
7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?
Score
0
Comments
There is no publicly available evidence that the company aims to establish the beneficial ownership of its agents.
Evidence
No evidence found.



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?

Score

n

Comments

There is no evidence that the company includes anti-bribery and corruption clauses in its contracts with agents and intermediaries.

Evidence



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?

Score

Λ

Comments

There is no evidence that the company considers incentive structures as a risk factor in agent behaviour, nor is there evidence that the company's incentive structures for agents are designed to minimise risks of anti-bribery and corruption.

Evidence



7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company?

Score

0

Comments

There is no evidence that the company publishes any details of the agents currently contracted to act for and/or on behalf of the company.

Evidence

against agents?



Question 7.1.7 Does the company publish high-level results from incident investigations and sanctions applied

Score

n

Comments

There is no evidence that the company publishes any data on ethical or bribery and corruption related investigations, incidents or the associated disciplinary actions involving its agents.

Evidence



7.2 Joint Ventures

Question						
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?						
Score						
0						
Comments						
There is no publicly available evidence that the company conducts anti-bribery and corruption due diligence on its joint ventures.						
Evidence						
No evidence found.						



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?

Score

0

Comments

There is no evidence that the company commits to establishing or implementing anti-bribery and corruption policies or procedures in its joint ventures.

Evidence



7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?

Score

0

Comments

There is no evidence that the company commits to take an active role in preventing bribery and corruption in all of its joint ventures.

Evidence



8. Offsets

Question

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?

Score

0

Comments

There is no evidence that the company addresses the corruption risks associated with offset contracting, nor is there evidence that a dedicated body, department or team is responsible for monitoring the company's offset activities.

Evidence



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?

Score

n

Comments

There is no evidence that the company has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations.

Evidence



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?

Score

0

Comments

There is no evidence that the company publishes any details of the offset agents, brokers or consultancy firms currently contracted to act with and on behalf of its offset programme.

Evidence



Question					
8.4 Does the company publish details about the beneficiaries of its indirect offset projects?					
Score					
0					
Comments					
There is no evidence that the company publishes any details of its offset obligations or contracts.					
Evidence					
No evidence found.					



9. High Risk Markets

Question
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?
Score
0
Comments
There is no evidence that the company acknowledges the corruption risks of operating in different markets, or that risk assessment procedures are used to inform the company's operations in high risk markets.
Evidence
No evidence found.



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)?

Score

1

Comments

There is some publicly available evidence to indicate that the company publishes some information on its subsidiaries. The company provides an address for each entity, which is understood to represent the country of incorporation.

However, the company receives a score of '1' because this list does not provide further details such as the percentage ownership or country of operation for each entity. It is also not clear whether this list includes all of the company's holdings and there is no evidence that the list is updated on at least an annual basis.

Evidence

[1] Subsidiaries (Webpage)

Accessed 19/08/2019

https://www.indonesian-aerospace.com/about/subsidiaries



IPTN North America, Inc

Address : 1035 Andover Park West, Suite B Tukwila, Seattle, Washington 98188-7681, US

Telephone : (+1 206) 575 65 07

Fax : (+1 206) 575 65 07

Email : Gindra1702@iptnna.com

Website : http://www.iptnna.com

Product : Aerospace Parts & Services Trading Company and other High Tech Product

Precident Director : Gautama Indra Djaja



PT. NUSANTARA TURBIN DAN PROPULSI

Address	: Jalan Pajajaran 154, Kawasan Pabrik IV, Bandung 40174			
Telephone	: (62 22) 603 19 85 and (62 22) 604 56 56			
Fax	: (62 22) 603 77 47 and (62 22) 603 18 51			
Email	: umc@umcntp.co.id			
Website	: http://www.umcntp.co.id			
Product	: Maintenance, Repair & Overhaul of Aero Engines and Industrial Turbine & Rotating Equipment.			
Precident Director	: Ctr. Sumarsono			







PT. GENERAL ELECTRIC NUSANTARA TURBINE SERVICES (GENTS)

Address : Jalan Pajajaran 154, Kawasan Pabrik IV, Bandung 40174

Telephone : (+62 22) 603 57 20 and (+62 22) 603 59 60

Fax : (+62 22) 603 57 20 and (+62 22) 603 59 60

Email : slamet.susanto@ps.ge.com

Website : http://www.ge.com

Product : Repair & services combustion, turbine, component & spare parts for GE and Non-

GE.

Precident Director : Slamet Susanto





PT. GENERAL ELECTRIC TECHNOLOGY INDONESIA (GETI)

Address : -

Telephone : -

Fax :

Email : -

Website : http://www.ge.com

Product : Medical equipment industry and management consulting services in the fields of

medical equipment, en

Precident Director : Wayan Surya Wiroto



9.3 Does the company disclose its beneficial ownership and control structure?

Score

1

Comments

The company provides some information on its ownership structure, to indicate that it is a state owned enterprise operating in the Indonesian aerospace industry.

However, the company receives a score of '1' because it does not provide publish clear information to indicate that the government of Indonesia is its sole beneficial owner. There is also no evidence that ownership information about the company is available in a freely accessible corporate register or global beneficial ownership register.

Evidence

[2] Corporate Overview (Webpage)

Accessed 19/08/2019

https://www.indonesian-aerospace.com/about/our company

Since established in 1976, as a state owned company in Bandung, Indonesia, PTDI has successfully developed and grown its capability as an aerospace industry.



9.4 Does the company publish a percentage breakdown of its defence sales by customer?

Score

O

Comments

There is no evidence that the company publishes information about its defence sales in the form of a percentage breakdown by customer. The company provides a map on its website with details of the products or services delivered to each country, however this information is in the form of 'units' and does not provide an indication of the company's major customers. There is also no evidence that this data is updated on an annual basis.

Evidence

[6] Worldwide Customers (Webpage)

Accessed 20/03/2020

https://www.indonesian-aerospace.com/about/ww customer





[Webpage shows data in the same level of detail for each country represented by a flag]



10. State-Owned Enterprises (SOEs)

Question

10.1 Does the SOE publish a breakdown of its shareholder voting rights?

Score

0

Comments

There is no evidence that the company publishes information about its shareholder voting rights. The company indicates that it is a state-owned enterprise, but does not provide percentage details to indicate that the government of Indonesia is its sole holder of shares or voting rights.

Evidence

[2] Corporate Overview (Webpage)

Accessed 19/08/2019

https://www.indonesian-aerospace.com/about/our company

Since established in 1976, as a state owned company in Bandung, Indonesia, PTDI has successfully developed and grown its capability as an aerospace industry.



10.2 Are the SOE's commercial and public policy objectives publicly available?

Score

1

Comments

The company publishes some information on its commercial objectives, which include delivering competitive services and becoming a leader in the global aerospace industry. However, the company receives a score of '1' because these objectives are high-level and there is no evidence that they are reviewed or updated on an annual basis.

Evidence

[5] Vision and Mission (Webpage)

Accessed 20/03/2020

https://www.indonesian-aerospace.com/about/vision

Vision:

• Lead The Medium & Light Turboprop Aircraft Market And Become The Reference for Aerospace Company In The Asia Pacific Region By Optimizing Best Commercial And Industrial Competences.

Mission:

- As the center of competence in aerospace industry, military mission, and also for relevant non-aerospace application.
- As a key player in the global industries which has strategic alliance with other world class Aerospace Industries.
- Delivering the competitive products and services in terms of quality and cost.



10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?

Score

0

Comments

The company publishes some information about its board members, including the names and positions of several individuals. However, the company receives a score of '0' because it is not clear that this includes all of the company's directors and there is no evidence that the company publishes any further information about the board nomination or appointment process.

Evidence

[3] Organizational Structure (Webpage)

Accessed 19/08/2019

https://www.indonesian-aerospace.com/about/organizational_structure

ELFIEN GOENTORO

PRESIDENT DIRECTOR

Elfien Goentoro serves as President Director for PT Dirgantara Indonesia (Persero) based on SOE Minister Decree No. SK-177/MBU/08/2017 issued on August 31, 2017, about Dismissal and Appointment of Company Members, Board of Directors of PT Dirgantara Indonesia.

Elfien Goentoro holds a degree in Business Management – Padjajaran University (S3) on 2017, Master Business Administration – Cantebury Business School (S2) on 1994 and Chemical Engineering – Institute Technology of Bandung (S1) on 1987.

Prior to join with PTDI, he trusted as President Director of PT Pelni (Persero) from 2015 until August 2017 and as Director of Commerce and Business Development in the same company, a year before.

ADE YUYU WAHYUNA

DIRECTOR OF COMMERCE

Ade Yuyu Wahyuna serves as Director of Commerce in PT Dirgantara Indonesia (Persero) based on SOE Minister Decree No. SK-138/MBU/06/2019 issued on June 19, 2019, concerning Dismissal and Appointment of Company Members, Board of Directors of PT Dirgantara Indonesia.

He was graduated from Nusantara Islamic University for Bachelor of Administrative Law in 1990. Prior to his job now as Director of Commerce in 2019, he held roles as Corporate Secretary of PTDI in 2018 and having a solid experience in Business Development, Marketing and Sales in PTDI back then. Currently he also serves as a Commissioner of PT GENTS since year 2016.

[4] Commissioners (Webpage)

Accessed 19/08/2019

https://www.indonesian-aerospace.com/about/organizational structure

MARSEKAL TNI YUYU SUTISNA

HEAD COMMISSIONER

Born in Bandung on June 10, 1962, Air Marshal, Yuyu Sutisna was first appointed as President Commissioner of PT Dirgantara Indonesia (Persero) on March 29, 2018 based on the Decree of the Minister of State-Owned Enterprises Number: SK-77 / MBU / 03/2018 concerning Termination, Transfer of Duties and Appointment of the Board of Commissioners of the Company (Persero) PT Dirgantara Indonesia.

Air Marshal, Yuyu Sutisna was a Bachelor of Economics in 2003 and continued his study to obtain a Masters of Management from Gajayana University Malang in 2015. He is an Air Vice Marshal who now serves as the Air Force's Chief of Staff, effective since January 17, 2018, previously served as Deputy Air Force Chief of Staff in 2017.

MARSDYA TNI FAHRU ZAINI ISNANTO

VICE COMMISSIONER

Born in Klaten on September 19, 1963, Air Force Lieutenant General, Fahru Zaini Isnanto, was first appointed as Deputy President Commissioner of PT Dirgantara Indonesia (Persero) on June 20, 2017 based on the Decree of



the Minister of State-Owned Enterprises. Number: SK-114 / MBU / 06/2017 concerning the Termination and Appointment of Members of the Board of Commissioners of the Company (Persero) PT Dirgantara Indonesia.

Air Force Lieutenant General, Fahru Zaini Isnanto, was a graduate of the Air Force Academy in 1986. Then he continued his study in 2000 to obtain a Master of Defense at Canberra University, Australia. In this time, he is an Air Force Lieutenant General since January 25, 2019 and also has a mandate as Deputy Air Force Chief of Staff.



Question
10.4 Is the SOE's audit committee composed of a majority of independent directors?
Score
0
Comments
There is no evidence that the company has an audit committee which is composed of a majority of independent directors.
Evidence
No evidence found.



Question
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?
Score
0
Comments
There is no evidence that the company publishes any details about its management of asset transactions.
Evidence
No evidence found.



List of Evidence & Sources

No.	Type (Webpage or Document)	Name	Download Date	Link
01	Webpage	Subsidiaries	19/08/2019	https://www.indonesian-
				aerospace.com/about/subsidiaries
02	Webpage	Corporate Overview	19/08/2019	https://www.indonesian-
				aerospace.com/about/our_company
03	Webpage	Organizational	19/08/2019	https://www.indonesian-
		Structure		aerospace.com/about/organizational_structure
04	Webpage	Commissioners	19/08/2019	https://www.indonesian-
				aerospace.com/about/organizational_structure
05	Webpage	Vision and Mission	20/03/2020	https://www.indonesian-
				aerospace.com/about/vision
06	Webpage	Worldwide	20/03/2020	https://www.indonesian-
		Customers		aerospace.com/about/ww_customer