

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

FINAL ASSESSMENT

GENERAL ATOMICS

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	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	1/10
7. Agents, Intermediaries and Joint Ventures	10	0/20
8. Offsets	4	0/8
9. High Risk Markets	4	1/8
10. State-Owned Enterprises	0	N/A
TOTAL		2/102
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 evidence that the company has a publicly stated commitment to 'integrity' and 'high ethical standards', but it does not explicitly mention anti-bribery and corruption. There is no clear evidence that this statement is endorsed or authorised by the company's leadership and it only appears in its supplier code of conduct.
Evidence
<p>[1] Supplier Code of Conduct (Document) Accessed 16/10/2019 http://www.ga.com/Websites/ga/images/procurement/supplier_code_conduct.pdf [p.1] It is the policy of General Atomics (GA) to comply with all laws governing its domestic and foreign operations and to conduct its affairs in keeping with the highest moral, legal, and ethical standards. GA's Code of Business Ethics and Standards of Conduct is endorsed by the Company's shareholder, its Board of Directors, and management; and applies to all employees of the Company.</p>

Question
<p>1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories:</p> <ul style="list-style-type: none"> a) All employees, including staff and leadership of subsidiaries and other controlled entities; b) All board members, including non-executive directors.
Score
0
Comments
<p>There is no publicly available company has or publishes an anti-bribery and corruption policy for its employees.</p>
Evidence
<p>No evidence found.</p>

Question
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
No evidence found.

Question
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
0
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
No evidence found.

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 evidence that the company has a formal risk assessment procedure which is used to inform the company's anti-bribery and corruption programme.
Evidence
No evidence found.

Question
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
No evidence found.

Question
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
No evidence found.

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

Question
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 has an investigative procedure which includes a commitment to report material findings to the board of directors or the relevant authorities.
Evidence
No evidence found.

Question
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
No evidence found.

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.

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

Question
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
No evidence found.

Question
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
No evidence found.

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 publicly commits to support or protect employees who refuse to act unethically.
Evidence
No evidence found.

Question
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 evidence that the company has a publicly available policy of non-retaliation against whistleblowers or employees who report bribery and corruption incidents.
Evidence
No evidence found.

Question
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
0
Comments
There is no publicly available evidence that the company provides either whistleblowing or advice channels for its employees.
Evidence
No evidence found.

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 conflict of interest policy.
Evidence
No evidence found.

Question
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
0
Comments
There is no publicly available evidence that the company has procedures in place to manage conflict of interest or their oversight.
Evidence
No evidence found.

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 to regulate 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 publicly available evidence that the company publishes any details of its political contributions.
Evidence
No evidence found.

Question
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
0
Comments
There is no publicly available evidence that the company has a policy or procedure covering charitable donations or sponsorships.
Evidence
No evidence found.

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.

Question
5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?
Score
0
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 evidence that the company requires the involvement of its procurement department in the establishment or oversight of its supplier base.
Evidence
No evidence found.

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

Question
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
1
Comments
<p>Based on publicly available information, there is some evidence that the company ensures that its suppliers have adequate anti-bribery and corruption policies and procedures in place. This includes policies prohibiting bribery, and those that manage conflicts of interest, and gifts and hospitality.</p> <p>However, the company receives a score of ‘1’ because it is not clear what steps the company takes to ensure this in practice. In addition, it is not clear that the company assures itself of this for all suppliers and there is no evidence that this assurance is conducted when onboarding new suppliers and/or when there is a significant change in the business relationship. There is also no evidence that the company requires that its suppliers must have a policy on whistleblowing.</p>
Evidence
<p>[1] Supplier Code of Conduct (Document) Accessed 16/10/2019 http://www.ga.com/Websites/ga/images/procurement/supplier_code_conduct.pdf</p> <p>[p.1] This Supplier Code of Conduct, aimed at our supply base, sets forth those commitments and establishes expectations for any GA Supplier.</p> <p>[p.2] • Conflict of Interest: Suppliers will avoid any circumstance which may present, or appear to present, a conflict of interest (whether perceived or actual) in business dealings with GA.</p> <p>• Anti-Bribery and Anti-Corruption: Suppliers will never offer bribes or engage in corruption of any kind in connection with a GA contract.</p> <p>• Gifts and Entertainment: Suppliers will refrain from offering, soliciting or accepting (directly or indirectly) any gratuity, gift, favor, entertainment, loan, or anything of monetary value when dealing with GA representatives.</p> <p>[p.3] • Ethical Behavior: Suppliers will hold associates to high ethical standards, ensuring they respect laws, regulations (such as the Foreign Corrupt Practices Act and the UK Bribery Act) and moral standards, including compliant bookkeeping.</p>

Question
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
0
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
No evidence found.

Question
6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?
Score
0
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
No evidence found.

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 policy on the use of agents.
Evidence
No evidence found.

Question
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 evidence that the company conducts anti-bribery and corruption due diligence on its agents or intermediaries.
Evidence
No evidence found.

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 evidence that the company aims to establish the beneficial ownership of its agents.
Evidence
No evidence found.

Question
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
0
Comments
There is no publicly available evidence that the company includes anti-bribery and corruption clauses in its contracts with agents and intermediaries.
Evidence
No evidence found.

Question
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
0
Comments
There is no evidence that the company recognises incentive structures as a risk factor in agent behaviour.
Evidence
No evidence found.

Question
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 its behalf.
Evidence
No evidence found.

Question
7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?
Score
0
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 agents.
Evidence
No evidence found.

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.

Question
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, nor that it requires anti-bribery and corruption clauses in its contracts with joint venture partners.
Evidence
No evidence found.

Question
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
No evidence found.

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
No evidence found.





Question
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
0
Comments
There is no publicly available evidence that the company has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence on its offset obligations.
Evidence
No evidence found.

Question
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
No evidence found.

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, nor that risk assessment procedures are used to inform the company's operations in high risk markets.
Evidence
No evidence found.

Question
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
<p>The company publishes a list of affiliated companies, which appears to include consolidated subsidiaries and non-fully consolidated holdings.</p> <p>However, the company receives a score of ‘1’ because this list does not include the percentage ownership, country of incorporation and/or countries of operation for each entity. There is also no evidence that the list is updated on an annual basis, nor is it accompanied by a statement that it is complete at the time of publication to the best of the company’s knowledge.</p>
Evidence
<p>[2] Affiliated Companies (Webpage) Accessed 16/10/2019 http://www.ga.com/affiliated-companies</p> <div style="display: flex; flex-direction: column; gap: 10px;"> <div>  <p>General Atomics Aeronautical Systems, Inc. (GA-ASI)</p> <p>General Atomics Aeronautical Systems, Inc. is a leading manufacturer of unmanned aircraft and high resolution surveillance and radar imaging systems, including the Predator UAV series and the Lynx SAR/GMTI sensor system. The company provides comprehensive solutions for military and commercial applications worldwide and is committed to providing immediately deployable, transformational technology for military operation and weapons systems, as well as civil missions.</p> </div> <div>  <p>General Atomics Aeronautical Systems UK (GA-UK)</p> <p>Based in London, England, General Atomics Aeronautical Systems UK Ltd (GA-UK) works to support General Atomics Aeronautical Systems, Inc.’s unmanned aircraft and related systems.</p> </div> <div>  <p>General Atomics Systems Integration (GA-SI)</p> <p>General Atomics Systems Integration, LLC, an affiliated company of General Atomics, is comprised of two divisions providing best value defense services for U.S. and International customers. The Aero Services Division specializes as a full service solution to meet the persistent intelligence, surveillance, and reconnaissance (ISR) challenges facing domestic and allied nation security missions. The Engineering Services Division is a leading edge expert in reliability, maintainability and sustainability improvement for U.S. aging aircraft systems.</p> </div> <div>  <p>Diazyme</p> <p>Diazyme Laboratories, Inc. an affiliate of General Atomics, uses its proprietary enzyme technologies to develop diagnostic reagents which can be used on most automated chemistry analyzers in user-friendly formats. Diazyme’s products include test kits for diagnosis of cardiovascular disease, liver disease, cancer markers, renal disease, diabetes, and electrolytes.</p> </div> </div>



ConverDyn

ConverDyn serves the global nuclear industry, offering the highest quality UF6 at competitive prices. They coordinate and manage all aspects of the conversion process for their customers, including uranium deliveries, uranium sampling, materials storage, and product delivery.



Cotter

Cotter Corporation is a General Atomics (GA) affiliate headquartered in Denver, Colorado. Originally incorporated in 1956 in New Mexico as a uranium production company, Cotter was purchased by and became a wholly owned subsidiary of Commonwealth Edison in 1975. GA acquired Cotter in early 2000. Through its various mining and milling operations, Cotter has produced uranium, vanadium, molybdenum, silver, lead, zinc, copper, selenium, nickel, cobalt, tungsten and limestone.



Heathgate

Heathgate Resources Pty Ltd, formed in 1990, is the owner and operator of the Beverley Uranium Mine in northern South Australia. Beverley is Australia's third uranium mine and Australia's only operating In Situ Leach mine. Beverley is the most advanced In Situ Leach mine in the world and plays a significant role in South Australia's resource development industry.



Nuclear Fuels Corporation

Nuclear Fuels Corporation (NFC) was formed in 1991 by General Atomics (GA) to market uranium produced from GA mining assets as well as to develop additional uranium projects. NFC is a long-term contract supplier to both U.S. and foreign utilities and actively participates in uranium trading.



Rio Grande Resources Corporation

Rio Grande Resources Corporation controls uranium operations and mineral resources acquired by GA from Chevron Resources in 1991. Included in this acquisition were mines in south Texas and New Mexico. In New Mexico, the Mt. Taylor project, a conventional underground mine that contains the largest uranium resource in the United States, is currently on standby.



General Atomics Europe GmbH (GA-Europe)

General Atomics Europe GmbH (GA-Europe) stands as holding at the head of the General Atomics Europe Group and renders commercially characterized and marketing/sales oriented consulting and support services for the companies of the group.

General Atomics Europe GmbH is engaged through its subsidiaries in the development of industrial estates, remediation of large-scale uranium and lignite coal mining areas, manufacturing high-mass prefabricated concrete components for the industry, traffic and communication sector, maintenance/service and modernization/conversion of special rail vehicles and the reprocessing of munitions.

Headquartered in Dresden, Germany, GA-Europe subsidiaries operate plants in Brandenburg and Saxony. GA-Europe and its subsidiaries also support GA in the expansion of its activities throughout Germany, Scandinavia, and Benelux.

Question
9.3 Does the company disclose its beneficial ownership and control structure?
Score
0
Comments
There is no evidence that the company publishes any information about its beneficial ownership or control structure, nor a statement that no individual owns 25% or more of shares or voting rights.
Evidence
No evidence found.

Question
9.4 Does the company publish a percentage breakdown of its defence sales by customer?
Score
0
Comments
There is no evidence that the company publishes any information about its defence sales in the form of a percentage breakdown by customer.
Evidence
No evidence found.

10. State-Owned Enterprises (SOEs)

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

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

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

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

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
N/A
Comments
N/A
Evidence

List of Evidence & Sources

No.	Type <i>(Webpage or Document)</i>	Name	Download Date	Link
01	Document	Supplier Code of Conduct	16/10/2019	http://www.ga.com/Websites/ga/images/procurement/supplier_code_conduct.pdf
02	Webpage	Affiliated Companies	16/10/2019	http://www.ga.com/affiliated-companies