

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

FINAL ASSESSMENT

THE AEROSPACE CORPORATION

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	5	0/10
6. Supply Chain Management	5	2/10
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
TOTAL		2 / 70
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
The organisation has a publicly stated commitment to ethics and integrity, which is indirectly supported by the company’s leadership as part of the Corporate Social Responsibility Report. The organisation receives a score of ‘0’ because this statement is indirect and does not explicitly mention anti-bribery and corruption.
Evidence
<p>[1] Corporate Social Responsibility Report 2018 (Document) Accessed 21/10/2019 https://aerospace.org/sites/default/files/2018-11/JB18_0082_CSR2018_digital_FINAL.PDF</p> <p>[p.2] Letter from the President I am delighted to share The Aerospace Corporation’s Corporate Social Responsibility Report for 2018, which highlights our service as corporate citizens of our community.</p> <p>This is a dynamic era of change for space, with many exciting opportunities that will reshape our lives. Just as Aerospace remains committed to staying ahead of the challenges that confront our nation’s space enterprise, so, too, do we remain dedicated to serving the needs of our fellow citizens here on Earth.</p> <p>I am proud that, over this past year, Aerospace expanded its work to promote the STEM fields for schoolchildren across the nation and expanded its charitable involvement with our neighborhoods. We also introduced more initiatives to promote diversity and inclusion, incorporated new measures to protect the environment, and enhanced the company’s business ethics practices.</p> <p>These various efforts not only improve lives but also the life of our company, providing a growing foundation for us to serve as both stewards of our community’s well-being and our country’s mission in space.</p> <p>Steven J. Isakowitz President and CEO</p> <p>[p.24] “Business ethics lie at the center of our core values of objectivity and integrity. Our commitment to these values is enduring and critical to addressing the evolving demands of the space enterprise.”</p> <p>Malissia Clinton, senior vice president, General Counsel</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
There is no publicly available evidence that the organisation has an anti-bribery and corruption policy.
Evidence
No evidence found.

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 organisation 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 managerial-level employee has ultimate responsibility for implementing and managing the organisation’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 organisation has a formal risk assessment procedure which is used to inform its 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 evidence that the organisation’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 publicly available evidence that the organisation 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 evidence that the organisation 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 organisation's investigative procedure includes a commitment to report material findings to its board or to 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
The organisation does not publish 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 evidence that the organisation provides anti-bribery and corruption training to all 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 organisation 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 organisation 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 organisation’s incentive schemes 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 organisation 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 publicly available evidence that the organisation has a 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 evidence that the organisation provides 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 organisation 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 evidence that the organisation has procedures to manage conflicts 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 organisation 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 organisation 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
N/A
Comments
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.
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
N/A
Comments
There is no readily available evidence that the organisation is able to make political contributions due to its nature as a non-profit, tax-exempt organisation in the United States of America.
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 evidence that the organisation has a policy or procedure covering both charitable donations and 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 evidence that the organisation 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 organisation 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 organisation provides 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 organisation has a policy or procedure 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
1
Comments
<p>Based on publicly available information, there is some evidence that the organisation requires the involvement of its procurement department in the establishment of new suppliers. The organisation indicates that this department is ultimately responsible for providing oversight of the company's supplier base.</p> <p>However, the organisation receives a score of '1' because there is no evidence that it takes steps to assure itself of the procurement department's involvement in this process at least every three years.</p>
Evidence
<p>[2] Doing Business with Aerospace (Webpage) Accessed 21/10/2019 https://aerospace.org/suppliers Aerospace is committed to ensuring that capable businesses of all types can pursue meaningful subcontracting opportunities with us. The Aerospace procurement department considers multiple factors when determining which businesses and new suppliers to work with including experience, financial stability, and technical qualifications.</p> <p>[...]</p> <p>Procurement is located at our El Segundo headquarters facility. Aerospace strives to approach supplier relationships as alliances that influence the success of our research programs. Existing and potential suppliers are encouraged to present innovative ideas and technologies.</p> <p>Aerospace is committed to ensuring that capable businesses of all types are eligible for meaningful subcontracting opportunities. Aerospace is committed to responsible business practices, and our procurement personnel consider multiple factors in determining which businesses to ally with, such as experience, financial stability, and technical qualifications.</p> <p>[...]</p> <p>HOW WE CAN WORK TOGETHER If you are a small and/or diverse company interested in doing business with Aerospace or wish to be considered for future opportunities, we suggest the following steps to introduce your company to us.</p> <p>[...]</p> <p>The SAM and Supplier Profile databases are used by Aerospace procurement, engineering, and other departments to search for suppliers whose capabilities match potential bid opportunities.</p>

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 organisation 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 organisation ensures that its suppliers have adequate anti-bribery and corruption policies and procedures in place. There is evidence that the organisation requires its suppliers, through its contracts with them, to have policies that prohibit bribery and facilitation payments, and those that cover whistleblowing.</p> <p>However, the organisation receives a score of '1' because it does not explicitly state that all suppliers must have policies covering conflicts of interest or gifts and hospitality. There is also no evidence that the organisation assures itself of this for all suppliers and it is not clear that this assurance is refreshed when there is a significant change in the business relationship.</p>																								
Evidence																								
<p>[3] Additional Government Contract Clauses 717100 (Document) Accessed 21/10/2019 https://www.dropbox.com/sh/b8ojepc9vo3hbfr/AABTIBjaUZcUe5n2ndhYkI08a?dl=0&lst=&preview=T-SUPP_717100.pdf [p.1]</p> <p>GOVERNMENT CONTRACT CLAUSES: This Order is issued under a grant with the U.S. Government, the following Federal Acquisition Regulation (FAR) and full text clauses are incorporated herein by reference. If any of the clauses are not applicable by their terms they shall be self-deleting. The full text of a clause may be accessed electronically at this/these address(es):</p> <p>FAR http://www.acquisition.gov/far/</p> <p>Where necessary to derive proper meaning in a subcontract situation from these clauses, "Contractor" means "Seller", "Contracting Officer" means "Buyer", "Contract" means this Order and "Government" means "Buyer or the Government". However, the words "Government" and "Contracting Officer" do not change: (a) when a right, act, authorization or obligation can be granted or performed only by the Government or the prime contract Contracting Officer or duly authorized representative and (b) when title to property is to be transferred directly to the Government.</p> <table border="1"> <thead> <tr> <th>#</th> <th>FAR CLAUSE</th> <th>TITLE</th> <th>DATE</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>52.202-1</td> <td>Definitions</td> <td>JAN 2012</td> </tr> <tr> <td>2.</td> <td>52.203-3</td> <td>Gratuities</td> <td>APR 1984</td> </tr> <tr> <td>3.</td> <td>52.203-12</td> <td>Limitation on Payments to Influence Certain Federal Transactions</td> <td>SEP 2007</td> </tr> <tr> <td>4.</td> <td>52.203-13</td> <td>Contractor Code of Business Ethics and Code of Conduct</td> <td>OCT 2015</td> </tr> <tr> <td>5.</td> <td>52.203-15</td> <td>Whistleblower Protections Under the American Recovery and Reinvestment Act of 2009</td> <td>JUN 2010</td> </tr> </tbody> </table> <p>[...]</p> <p>28. Equal Employment Opportunity [Ref: FAR 52.22-26, -35, -36 above] All contracts shall contain a provision requiring compliance with Executive Order 11246, "Equal Employment Opportunity," as amended by Executive Order 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," and as supplemented by regulations at 41 CFR Part 60, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor."</p> <p>29. Copeland "Anti Kickback" Act (18 U.S.C. 874 and 40 U.S.C. 276c) [Ref: FAR 52.222-10 above] All contracts in excess of \$2,000 for construction or repair awarded by recipients shall include a provision for compliance with the Copeland "Anti Kickback" Act (18 U.S.C. 874), as supplemented by Department of Labor regulations (29 CFR Part 3, "Contractors and Subcontractors on Public Building or Public Work Financed in Whole or in Part by Loans or Grants from the United States"). The Act provides that each contractor shall be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he is otherwise entitled. The recipient shall report all suspected or reported violations to NASA.</p> <p>[p.2]</p> <p>34. Byrd Anti Lobbying Amendment (31 U.S.C. 1352) [Ref: FAR 52.203-12, -13 above] Contractors who apply or bid for an award of \$100,000 or more shall file the required certification. Each tier certifies to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier shall also disclose any lobbying with non Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier up to the recipient.</p>	#	FAR CLAUSE	TITLE	DATE	1.	52.202-1	Definitions	JAN 2012	2.	52.203-3	Gratuities	APR 1984	3.	52.203-12	Limitation on Payments to Influence Certain Federal Transactions	SEP 2007	4.	52.203-13	Contractor Code of Business Ethics and Code of Conduct	OCT 2015	5.	52.203-15	Whistleblower Protections Under the American Recovery and Reinvestment Act of 2009	JUN 2010
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[4] Additional Government Contract Clauses 709000 (Document)

Accessed 21/10/2019

https://www.dropbox.com/sh/b8oje9pc9vo3hbfr/AABTIBjaUZcUe5n2ndhYkI08a?dl=0&lst=&preview=T-SUPP_709000.pdf

[p.1]

GOVERNMENT CONTRACT CLAUSES: This Order is issued in support of a contract with the U.S. Government, the following Federal Acquisition Regulation (FAR) clauses are incorporated herein by reference. If any of the clauses are not applicable by their terms they shall be self-deleting. The full text of a clause may be accessed electronically at this address:

FAR <http://www.acquisition.gov/far/>

Where necessary to derive proper meaning in a subcontract situation from these clauses, "Contractor" means "Seller", "Contracting Officer" means "Buyer", "Contract" means this Order and "Government" means "Buyer or the Government". However, the words "Government" and "Contracting Officer" do not change when a right, act, authorization or obligation can be granted or performed only by the Government or the prime contract Contracting Officer or duly authorized representative.

#	FAR CLAUSE	TITLE	DATE
1.	52.203-13	Contractor Code of Business Ethics and Code of Conduct	APR 2010
2.	52.203-15	Whistleblower Protections Under the American Recovery and Reinvestment Act of 2009	JUN 2010

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 organisation 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 organisation publishes any data on ethical or anti-bribery and corruption-related investigations relating to its suppliers, or the associated disciplinary actions.
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
N/A
Comments
There is no readily available evidence that the organisation engages agents in the conduct of business due to its nature as a non-profit.
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
N/A
Comments
There is no readily available evidence that the organisation engages agents in the conduct of business due to its nature as a non-profit.
Evidence
No evidence found.

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

Question
7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?
Score
N/A
Comments
There is no readily available evidence that the organisation engages agents in the conduct of business due to its nature as a non-profit.
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 evidence that the organisation 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 organisation commits to establishing or implementing anti-bribery and corruption policies or procedures in its joint ventures, and it does not require 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 organisation 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
N/A
Comments
There is no readily available evidence that the organisation engages in offset contracting.
Evidence
No evidence found.

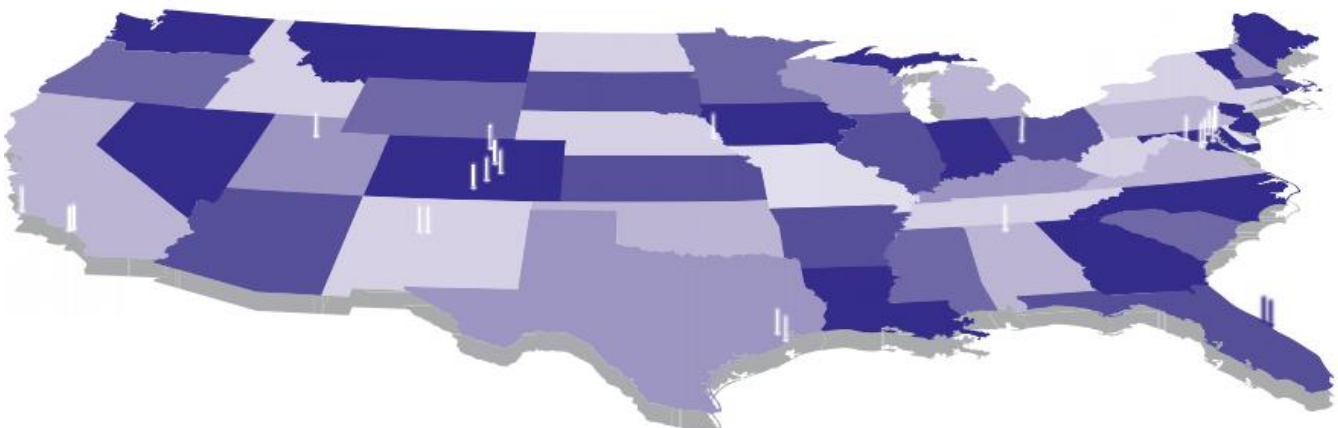
Question
8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?
Score
N/A
Comments
There is no readily available evidence that the organisation engages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

Question
8.4 Does the company publish details about the beneficiaries of its indirect offset projects?
Score
N/A
Comments
There is no readily available evidence that the organisation engages in offset contracting.
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
N/A
Comments
There is no readily available evidence that the organisation is engaged in supplying goods or services, nor that it operates in markets or jurisdictions outside of the United States of America.
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
0
Comments
The organisation publishes some information about the locations in which it operates; however, it does not provide details about its corporate structure to indicate whether these locations represents offices or subsidiaries or other holdings.
Evidence
<p>[5] Annual Report 2018 (Document) Accessed 21/10/2019 https://aerospace.org/sites/default/files/2018-12/TheAerospaceCorp-AR2018.pdf [Cover] Corporate Profile</p> <p>The Aerospace Corporation is a national nonprofit corporation that operates a federally funded research and development center (FFRDC) and has approximately 4,000 employees. With three major locations in El Segundo, Calif., Colorado Springs and Washington, D.C., Aerospace addresses complex problems with agility, innovation, and objective, technical leadership across the space enterprise and other areas of national significance. FFRDCs fill a unique role in service to the government and the nation. Along with commercial industry and academia, FFRDCs support government science, engineering, and technology development. FFRDCs do not compete with industry and do not manufacture products, eliminating conflict of interest, which enables them to work with industry on important problems. FFRDCs operate as strategic partners with their sponsoring government agencies to ensure the highest levels of objectivity and technical excellence.</p> <p>[p.32]</p> <p><u>Locations</u></p>  <ul style="list-style-type: none"> California <ul style="list-style-type: none"> • El Segundo (corp. HQ) • Pasadena • Vandenberg Air Force Base Colorado <ul style="list-style-type: none"> • Buckley Air Force Base • Colorado Springs • Denver • Peterson Air Force Base • Schriever Air Force Base Alabama <ul style="list-style-type: none"> • Huntsville Florida <ul style="list-style-type: none"> • Cape Canaveral Air Force Station • Kennedy Space Center Maryland <ul style="list-style-type: none"> • Columbia • Goddard Space Flight Center • Silver Spring • Suitland Nebraska <ul style="list-style-type: none"> • Offutt Air Force Base New Mexico <ul style="list-style-type: none"> • Albuquerque • Kirtland Air Force Base Ohio <ul style="list-style-type: none"> • Wright-Patterson Air Force Base Texas <ul style="list-style-type: none"> • Houston • Johnson Space Center Utah <ul style="list-style-type: none"> • Hill Air Force Base Virginia <ul style="list-style-type: none"> • Arlington • Chantilly

Question
9.3 Does the company disclose its beneficial ownership and control structure?
Score
N/A
Comments
The organisation is a non-profit organisation and therefore does not have shareholders.
Evidence
<p>[5] Annual Report 2018 (Document) Accessed 21/10/2019 https://aerospace.org/sites/default/files/2018-12/TheAerospaceCorp-AR2018.pdf [Cover] Corporate Profile</p> <p>The Aerospace Corporation is a national nonprofit corporation that operates a federally funded research and development center (FFRDC) and has approximately 4,000 employees. With three major locations in El Segundo, Calif., Colorado Springs and Washington, D.C., Aerospace addresses complex problems with agility, innovation, and objective, technical leadership across the space enterprise and other areas of national significance.</p>

Question
9.4 Does the company publish a percentage breakdown of its defence sales by customer?
Score
N/A
Comments
There is no readily available evidence that the company engages in commercial or industry sales in the defence sector.
Evidence
<p>[5] Annual Report 2018 (Document) Accessed 21/10/2019 https://aerospace.org/sites/default/files/2018-12/TheAerospaceCorp-AR2018.pdf [Cover] Corporate Profile The Aerospace Corporation is a national nonprofit corporation that operates a federally funded research and development center (FFRDC) and has approximately 4,000 employees. With three major locations in El Segundo, Calif., Colorado Springs and Washington, D.C., Aerospace addresses complex problems with agility, innovation, and objective, technical leadership across the space enterprise and other areas of national significance. FFRDCs fill a unique role in service to the government and the nation. Along with commercial industry and academia, FFRDCs support government science, engineering, and technology development. FFRDCs do not compete with industry and do not manufacture products, eliminating conflict of interest, which enables them to work with industry on important problems. FFRDCs operate as strategic partners with their sponsoring government agencies to ensure the highest levels of objectivity and technical excellence.</p>

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

N o.	Type <i>(Webpage or Document)</i>	Name	Download Date	Link
01	Document	Corporate Social Responsibility Report 2018	21/10/2019	https://aerospace.org/sites/default/files/2018-11/JB18_0082_CSR2018_digital_FINAL.PDF
02	Webpage	Doing Business with Aerospace	21/10/2019	https://aerospace.org/suppliers
03	Document	Additional Government Contract Clauses 717100	21/10/2019	https://www.dropbox.com/sh/b8oje9pc9vo3hbfr/AA-BTIBjaUZcUe5n2ndhYkl08a?dl=0&lst=&preview=T-SUPP_717100.pdf
04	Document	Additional Government Contract Clauses 709000	21/10/2019	https://www.dropbox.com/sh/b8oje9pc9vo3hbfr/AA-BTIBjaUZcUe5n2ndhYkl08a?dl=0&lst=&preview=T-SUPP_709000.pdf
05	Document	Annual Report 2018	21/10/2019	https://aerospace.org/sites/default/files/2018-12/TheAerospaceCorp-AR2018.pdf