

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

FINAL ASSESSMENT

THE MITRE 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	1/8
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
TOTAL		1 / 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			
There is no evidence that the organisation has a publicly stated commitment to anti-bribery and corruption that is authorised by its leadership. The organisation makes a publicly stated commitment to high standards of ethical conduct but there is no specific mention of anti-bribery and corruption, nor is there evidence that this commitment is supported by a senior figure.			
Evidence			
<p>[1] Code of ethics and conduct Accessed 17/07/2019 https://www.mitre.org/sites/default/files/publications/MITRE-code-of-ethics_0.pdf [p.1] Working in the public interest requires MITRE to render impartial services that are free of conflict of interest. In performing our work, we at MITRE must adhere to the highest standards of ethical conduct and business practice. MITRE's Ethical Values and Code of Ethics & Conduct guide employees in the recognition and resolution of ethical dilemmas.</p> <table><tr><td>Service in the Public Interest Respect for the Individual Promise Keeping</td><td>Professional Integrity Independence Impartiality</td><td>Honesty Fairness Collaboration</td></tr></table> <p>We at MITRE:</p> <ul style="list-style-type: none">• Conduct ourselves professionally at all times;• Perform to the best of our abilities in an honest, cooperative, and fair manner;• Respect the rights of all individuals to fair treatment and equal opportunity in an environment free of discrimination and harassment;• Protect MITRE's information and materials and those of sponsors and contractors;• Avoid any actual or perceived conflict of interest in personal and business relationships;• Refrain from misuse of our professional positions for personal gain;• Respect the ethical constraints our clients place on the activities of their employees;• Adhere to our government sponsors' rules concerning source selection, procurement integrity, and avoidance of organizational conflict of interest;• Protect MITRE and government resources from theft, damage, or misuse;• Accurately and conscientiously record all time charges, costs, and other business records;• Comply with laws and regulations that affect our work. <p>All MITRE employees, consultants, and contractors are obligated to comply with this Code. MITRE management, Human Resources, and the Office of Ethics and Compliance encourage employees to discuss with them the obligations and ethical dilemmas they may face. Employees may also direct questions or concerns in confidence via our anonymous employee telephone hotline or online reporting services, which are available around the clock.</p>	Service in the Public Interest Respect for the Individual Promise Keeping	Professional Integrity Independence Impartiality	Honesty Fairness Collaboration
Service in the Public Interest Respect for the Individual Promise Keeping	Professional Integrity Independence Impartiality	Honesty Fairness Collaboration	
<p>[3] Building a foundation for the future (webpage) Accessed 17/07/2019 https://www.mitre.org/about/corporate-social-responsibility/building-a-foundation-for-the-future Commitment to Ethics</p>			

As a company chartered to work in the public interest, we take our commitment to integrity seriously. That's why MITRE's Ethics and Compliance Program establishes standards of conduct and guides employees on their importance and application to their daily work.

[5] Mission and values

Accessed 17/07/2019

<https://www.mitre.org/about/mission-and-values>

Integrity Above all Else

Exercising the highest possible ethical and professional standards is fundamental to how MITRE operates. As a public-service organization, we adhere to a Code of Ethics & Conduct, founded in honesty and fairness, supported by the professional integrity of each employee.

Question			
1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to 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 organisation has an anti-bribery and corruption policy. The organisation makes a general commitment to upholding ethical values but there is no specific mention of policies or procedures to prevent bribery and corruption.			
Evidence			
<p>[1] Code of ethics and conduct Accessed 17/07/2019 https://www.mitre.org/sites/default/files/publications/MITRE-code-of-ethics_0.pdf [p.1] Working in the public interest requires MITRE to render impartial services that are free of conflict of interest. In performing our work, we at MITRE must adhere to the highest standards of ethical conduct and business practice. MITRE's Ethical Values and Code of Ethics & Conduct guide employees in the recognition and resolution of ethical dilemmas.</p> <table><tr><td>Service in the Public Interest Respect for the Individual Promise Keeping</td><td>Professional Integrity Independence Impartiality</td><td>Honesty Fairness Collaboration</td></tr></table> <p>We at MITRE:</p> <ul style="list-style-type: none">• Conduct ourselves professionally at all times;• Perform to the best of our abilities in an honest, cooperative, and fair manner;• Respect the rights of all individuals to fair treatment and equal opportunity in an environment free of discrimination and harassment;• Protect MITRE's information and materials and those of sponsors and contractors;• Avoid any actual or perceived conflict of interest in personal and business relationships;• Refrain from misuse of our professional positions for personal gain;• Respect the ethical constraints our clients place on the activities of their employees;• Adhere to our government sponsors' rules concerning source selection, procurement integrity, and avoidance of organizational conflict of interest;• Protect MITRE and government resources from theft, damage, or misuse;• Accurately and conscientiously record all time charges, costs, and other business records;• Comply with laws and regulations that affect our work. <p>All MITRE employees, consultants, and contractors are obligated to comply with this Code. MITRE management, Human Resources, and the Office of Ethics and Compliance encourage employees to discuss with them the obligations and ethical dilemmas they may face. Employees may also direct questions or concerns in confidence via our anonymous employee telephone hotline or online reporting services, which are available around the clock.</p> <p>[3] Building a foundation for the future (webpage) Accessed 17/07/2019 https://www.mitre.org/about/corporate-social-responsibility/building-a-foundation-for-the-future Commitment to Ethics</p> <p>As a company chartered to work in the public interest, we take our commitment to integrity seriously. That's why MITRE's Ethics and Compliance Program establishes standards of conduct and guides employees on their importance and application to their daily work.</p>	Service in the Public Interest Respect for the Individual Promise Keeping	Professional Integrity Independence Impartiality	Honesty Fairness Collaboration
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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 that 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 procedure for dealing with bribery and corruption allegations, incidents or whistleblowing reports. There is evidence that it operates a whistleblowing channel, however the organisation does not provide any further information on how allegations and investigations are handled.
Evidence
<p>[1] Code of ethics and conduct Accessed 17/07/2019 https://www.mitre.org/sites/default/files/publications/MITRE-code-of-ethics_0.pdf [p.1] All MITRE employees, consultants, and contractors are obligated to comply with this Code. MITRE management, Human Resources, and the Office of Ethics and Compliance encourage employees to discuss with them the obligations and ethical dilemmas they may face. Employees may also direct questions or concerns in confidence via our anonymous employee telephone hotline or online reporting services, which are available around the clock.</p>

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 the board and, if appropriate, to 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
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.
Score
0
Comments
There is no evidence that the organisation provides tailored anti-bribery and corruption training to its employees depending on their exposure to potential risks.
Evidence
No evidence found.

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 effectiveness 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
The organisation does not have 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
<p>There is evidence that the organisation provides whistleblowing and advice channels for use by its employees. The organisation states that these channels allow for anonymous reporting and that concerns may be raised in confidence.</p> <p>However, the organisation receives a score of '0' because the information provided about these channels is insufficiently clear and there is no publicly available evidence of how employees may access these channels. It is also not clear whether the organisation provides both internally- and externally-operated channels, nor is it clear whether these channels are available to employees of third parties, suppliers and joint venture partners.</p>
Evidence
<p>[1] Code of ethics and conduct Accessed 17/07/2019 https://www.mitre.org/sites/default/files/publications/MITRE-code-of-ethics_0.pdf [p.1] MITRE management, Human Resources, and the Office of Ethics and Compliance encourage employees to discuss with them the obligations and ethical dilemmas they may face.</p> <p>Employees may also direct questions or concerns in confidence via our anonymous employee telephone hotline or online reporting services, which are available around the clock.</p>

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
1
Comments
<p>There is evidence that the organisation has a policy that formally requires employees to avoid any actual or perceived conflicts of interest. The organisation states that this includes both personal and business relationships, and there is evidence that this applies to all employees and third parties.</p> <p>However, the organisation receives a score of '1' because it does not provide any further information on potential categories of conflicts – e.g. government relationships, financial interests, etc. – and it does not explicitly state that this policy applies to all board members.</p>
Evidence
<p>[1] Code of ethics and conduct Accessed 17/07/2019 https://www.mitre.org/sites/default/files/publications/MITRE-code-of-ethics_0.pdf [p.1] Working in the public interest requires MITRE to render impartial services that are free of conflict of interest.</p> <p>[...]</p> <p>We at MITRE:</p> <p>[...]</p> <ul style="list-style-type: none"> • Avoid any actual or perceived conflict of interest in personal and business relationships; <p>[...]</p> <ul style="list-style-type: none"> • Adhere to our government sponsors' rules concerning source selection, procurement integrity, and avoidance of organizational conflict of interest; <p>[...]</p> <p>All MITRE employees, consultants, and contractors are obligated to comply with this Code.</p>

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 organisation has procedures to manage conflicts of interest or their oversight. The organisation requires all employees to avoid actual or perceived conflicts but does not provide further information on specific procedures to identify, declare or manage conflicts of interest.
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
<p>[6] Military to Mitre (webpage) Accessed 17/07/2019 https://www.mitre.org/careers/military-to-mitre After you decide to leave the military, MITRE doesn't just offer you a job. We offer you the opportunity to continue serving our nation—and the world.</p> <p>During your transition from military to civilian life, taking the next step in your career is a big decision. That's why we invite you to consider MITRE—a not-for-profit company that has solved problems for a safer world for more than six decades.</p> <p>What makes MITRE different from other companies is our total commitment to unbiased advice. We have no commercial conflicts of interest to influence our findings.</p> <p>It's not about increasing the bottom line. It's about making a difference.</p> <p>At MITRE, you will be part of a team of technical experts—many of them veterans themselves—helping solve our nation's biggest challenges. We take pride in our special role, partnering with government decision makers for the greatest impact. You will have the opportunity to apply your technical knowledge and passion to advance our public-interest mission.</p>

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 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
5.1.2. 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 and/or procedure covering both charitable donations and sponsorships. The organisation publishes some information about its charitable activities in its Corporate Social Responsibility Report; however, this does not include full details of all charitable donations made, including details of the recipient, amount, country of recipient and which entity made the payment.

Evidence**[4] Corporate Social Responsibility Report 2017**

Accessed 17/07/2019

<https://www.mitre.org/sites/default/files/publications/2017-MITRE-CSR-Report.pdf>

[p.5]

Scouting for STEM

Robotics, game design, and aviation are just some of the 22 class titles offered during MITRE's Scout Engineering Day in McLean. It's no wonder that more than 400 Boy and Girl Scouts attend the all-day Saturday event each spring.

The Scouts, ages 11 through 17, come to earn their STEM merit badge. They leave with unique, hands-on research and development experience.

"MITRE has the equipment and labs to show kids how STEM is used to solve challenges on a large scale," says James Holdener, the event's organizer. "Very few Scouts earn STEM badges because you need knowledgeable instructors and the right tools. MITRE has both."

One of the day's most popular classes takes place in MITRE's Center for Advanced Aviation System Development. "Where else can you climb into an actual 747 cockpit and see what it's like to land a plane on a runway?" asks

Holdener, who has been a STEM merit badge counselor for a decade.

Holdener and a core volunteer team of a dozen MITRE employees map out the event's many moving parts over nine months. First and foremost, they make sure the activities meet STEM badge criteria and find the right subject matter experts to teach the half- and full-day classes. Facilities, logistics, security, food, and safety are just a few of the challenges the MITRE volunteers

coordinate. More than 125 MITRE employees volunteer on Scout Engineering Day.

"It's a big undertaking," says Steve Walsh, a core team member. "But we hope that by showing young people as much STEM as possible, something might stay with them."

Now in its sixth year, the effort is clearly having an impact. One participant shared, "I've attended many classes like this, but this was the best. I learned more during one day at MITRE than in several years going to similar STEM events elsewhere."



Girl Scouts and Boy Scouts participate in MITRE's Scout Engineering Day each year.

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 and/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
0
Comments
There is no evidence that the organisation requires the involvement of its procurement department in the establishment and 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 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			
0			
Comments			
There is no publicly available evidence that the organisation requires its suppliers to have their own anti-bribery and corruption policies and procedures in place. The organisation's Code of Ethics and Conduct applies to contractors; however, this refers to general standards of ethical business conduct and, with the exception of conflicts of interest, does not provide the level of detail of anti-bribery and corruption controls necessary to receive a score of '1'.			
Evidence			
<p>[1] Code of Ethics and Conduct Accessed 17/07/2019 https://www.mitre.org/sites/default/files/publications/MITRE-code-of-ethics_0.pdf [p.1] Working in the public interest requires MITRE to render impartial services that are free of conflict of interest. In performing our work, we at MITRE must adhere to the highest standards of ethical conduct and business practice. MITRE's Ethical Values and Code of Ethics & Conduct guide employees in the recognition and resolution of ethical dilemmas.</p> <table><tr><td>Service in the Public Interest Respect for the Individual Promise Keeping</td><td>Professional Integrity Independence Impartiality</td><td>Honesty Fairness Collaboration</td></tr></table> <p>We at MITRE:</p> <ul style="list-style-type: none">• Conduct ourselves professionally at all times;• Perform to the best of our abilities in an honest, cooperative, and fair manner;• Respect the rights of all individuals to fair treatment and equal opportunity in an environment free of discrimination and harassment;• Protect MITRE's information and materials and those of sponsors and contractors;• Avoid any actual or perceived conflict of interest in personal and business relationships;• Refrain from misuse of our professional positions for personal gain;• Respect the ethical constraints our clients place on the activities of their employees;• Adhere to our government sponsors' rules concerning source selection, procurement integrity, and avoidance of organizational conflict of interest;• Protect MITRE and government resources from theft, damage, or misuse;• Accurately and conscientiously record all time charges, costs, and other business records;• Comply with laws and regulations that affect our work. <p>All MITRE employees, consultants, and contractors are obligated to comply with this Code.</p> <p>MITRE management, Human Resources, and the Office of Ethics and Compliance encourage employees to discuss with them the obligations and ethical dilemmas they may face.</p> <p>Employees may also direct questions or concerns in confidence via our anonymous employee telephone hotline or online reporting services, which are available around the clock.</p>	Service in the Public Interest Respect for the Individual Promise Keeping	Professional Integrity Independence Impartiality	Honesty Fairness Collaboration
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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 organisation.
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 organisation.
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 organisation.
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 organisation.
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 organisation.
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 organisation.
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 partnerships, 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.
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
<p>There is no evidence that the organisation publishes a list of subsidiaries or affiliated entities. The organisation operates Federally Funded Research and Development Centers and publishes details of these entities, but these are considered to be different from subsidiaries.</p>
Evidence
<p>[2] Corporate overview (webpage) Accessed 17/07/2019 https://www.mitre.org/about/corporate-overview At MITRE, we solve problems for a safer world. Through our federally funded R&D centers and public-private partnerships, we work across government to tackle challenges to the safety, stability, and well-being of our nation.</p> <p>[...]</p> <p>We operate FFRDCs—federally funded research and development centers. FFRDCs are unique organizations that assist the United States government with scientific research and analysis; development and acquisition; and systems engineering and integration. We also have an independent research program that explores new and expanded uses of technologies to solve our sponsors' problems.</p> <p>[7] We operate FFRDCs (webpage) Accessed 17/07/2019 https://www.mitre.org/centers/we-operate-ffrdcs Our unique vantage point across government has its roots in FFRDCs—federally funded research and development centers. They're special organizations that promote objective collaboration to solve large-scale problems—in ways that affect us all, every day.</p> <p>[...]</p> <p>But despite the name, FFRDCs are about much more than R&D. These unique organizations serve as long-term strategic partners to the government, providing objective guidance in an environment free of conflicts of interest. They work with their government partners—also called sponsors—to assist with:</p> <ul style="list-style-type: none"> • Systems engineering and integration • Research and development • Study and analysis <p>The government first created FFRDCs in the 1940s. Back then, they focused largely on national-security challenges and provided technical capabilities unavailable within government or the private sector.</p> <p>Today, FFRDCs work in the fields of aviation, defense, energy, health and human services, space, federal agency modernization, homeland security, and more. They exist to:</p> <ul style="list-style-type: none"> • Address long-term problems of considerable complexity • Approach technical questions with a high degree of objectivity, and • Provide creative and cost-effective solutions to national problems <p>[...]</p> <p>What really sets FFRDCs apart is their freedom from conflicts of interest—they don't profit from the government's decisions. By law, FFRDCs can't:</p> <ul style="list-style-type: none"> • Manufacture products • Compete with industry, or • Work for commercial companies

These restrictions mean government and industry can provide FFRDCs with sensitive or proprietary information without fear of improper use or disclosure. This allows FFRDCs to help their sponsors:

- Acquire the right technology
- Objectively assess business processes, and
- Integrate complex systems

[10] Current FFRDCs and Their Administrators (Document)

Accessed 17/07/2019

<https://www.mitre.org/sites/default/files/publications/ffrdcs-current.pdf>

The National Science Foundation maintains the list of current federally funded research and development centers (FFRDCs) at www.nsf.gov/statistics/ffrdclist/. Today there are 40 FFRDCs, listed below. Since their inception, 58 FFRDCs have been discontinued as needs have changed or evolved (most sponsored by the Department of Defense, Department of Energy, and the now defunct Department of Health, Education, and Welfare).

FFRDC	Administrator
Department of Defense	
Aerospace FFRDC	The Aerospace Corporation
Arroyo Center	RAND Corp.
Center for Naval Analyses	The CNA Corporation
Lincoln Laboratory	Massachusetts Institute of Technology
National Defense Research Institute	RAND Corp.
National Security Engineering Center	The MITRE Corporation
Project Air Force	RAND Corp.
Software Engineering Institute	Carnegie Mellon University
Studies and Analyses Center	Institute for Defense Analyses

[List continues to show other FFRDCs sponsored by other government departments]

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>[2] Corporate overview (webpage) Accessed 17/07/2019 https://www.mitre.org/about/corporate-overview As a not-for-profit organization, MITRE works in the public interest across federal, state and local governments, as well as industry and academia. We bring innovative ideas into existence in areas as varied as artificial intelligence, intuitive data science, quantum information science, health informatics, space security, policy and economic expertise, trustworthy autonomy, cyber threat sharing, and cyber resilience.</p> <p>[...]</p> <p>As a company chartered to work in the public interest, we have no owners or shareholders, and we don't compete with industry. This lack of commercial conflicts of interest forms the basis for our objectivity.</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>[2] Corporate overview (webpage) Accessed 17/07/2019 https://www.mitre.org/about/corporate-overview At MITRE, we solve problems for a safer world. Through our federally funded R&D centers and public-private partnerships, we work across government to tackle challenges to the safety, stability, and well-being of our nation.</p> <p>As a not-for-profit organization, MITRE works in the public interest across federal, state and local governments, as well as industry and academia. We bring innovative ideas into existence in areas as varied as artificial intelligence, intuitive data science, quantum information science, health informatics, space security, policy and economic expertise, trustworthy autonomy, cyber threat sharing, and cyber resilience.</p> <p>We operate FFRDCs—federally funded research and development centers. FFRDCs are unique organizations that assist the United States government with scientific research and analysis; development and acquisition; and systems engineering and integration. We also have an independent research program that explores new and expanded uses of technologies to solve our sponsors' problems.</p> <p>[...]</p> <p>As a company chartered to work in the public interest, we have no owners or shareholders, and we don't compete with industry. This lack of commercial conflicts of interest forms the basis for our objectivity. We can acquire sensitive and proprietary information from the government, industry, and other partners to inform our work. Organizations are willing and able to share data because they know we won't use it for a competitive advantage.</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

No.	Type (Webpage or Document)	Name	Download Date	Link
01	Document	Code of ethics and conduct	17/07/2019	https://www.mitre.org/sites/default/files/publications/MITRE-code-of-ethics_0.pdf
02	Webpage	Corporate overview	17/07/2019	https://www.mitre.org/about/corporate-overview
03	Webpage	Building a foundation for the future	17/07/2019	https://www.mitre.org/about/corporate-social-responsibility/building-a-foundation-for-the-future
04	Document	Corporate social responsibility report 2017	17/07/2019	https://www.mitre.org/sites/default/files/publications/2017-MITRE-CSR-Report.pdf
05	Webpage	Mission and values	17/07/2019	https://www.mitre.org/about/mission-and-values
06	Webpage	Military to Mitre	17/07/2019	https://www.mitre.org/careers/military-to-mitre
07	Webpage	We operate FFRDCs	17/07/2019	https://www.mitre.org/centers/we-operate-ffrdcs
08	Webpage	Leadership	17/07/2019	https://www.mitre.org/about/leadership
09	Webpage	Board of trustees	17/07/2019	https://www.mitre.org/about/leadership/board-of-trustees
10	Document	Current FFRDCs and Their Administrators	17/07/2019	https://www.mitre.org/sites/default/files/publications/ffrdcs-current.pdf