

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

FINAL ASSESSMENT

KING ABDULLAH II DESIGN & DEVELOPMENT BUREAU

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

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

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

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



1. Leadership and Organisational Culture

Question

1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?

Score

0

Comments

There is no evidence that the company has a public commitment to anti-bribery and corruption that is authorised and endorsed by its senior leadership. The company has a publicly stated commitment to 'integrity' but does not explicitly mention anti-bribery and corruption, and there is no direct evidence that this statement is supported by a senior figure.

Evidence

[1] Values (webpage)

Accessed 09/09/2019

https://www.kaddb.com/Pages/Values

Values

Lying at the root of KADDB, our values represent a foundation outlining the principles of how and what we do by guiding our strategic decisions and activities; internally and externally.

[...]

Integrity

We build trust, honesty and consistency-based relationships as we strive to do what is right and deliver on that. We set the tone as a role model in discipline and alignment for the industry in the region. We are committed to and resiliently adhere to our high standards.



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

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



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

Score

0

Comments

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

Evidence



1.4. Is responsibility for implementing and managing the company's anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company's programme?

Score

O

Comments

There is no evidence that a specific managerial-level employee has ultimate responsibility for implementing and managing an anti-bribery and corruption programme.

Evidence



2. Internal Controls

Question

2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?

Score

0

Comments

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

Evidence



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 company's anti-bribery and corruption programme is subject to audit or review.
Evidence
No evidence found.



2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?

Score

0

Comments

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

Evidence



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



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 investigative procedure which includes a commitment to report material findings.
Evidence
No evidence found.



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

Score

0

Comments

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

Evidence



3. Support to Employees

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



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

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Comments

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

Evidence



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

Score

0

Comments

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

Evidence



3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?

Score

0

Comments

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

Evidence



Question
3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?
Score
0
Comments
There is no evidence that the company commits to support or protect employees who refuse to act unethically.
Evidence
No evidence found.



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

Score

0

Comments

The company does not have a publicly available policy of non-retaliation against whistleblowers or employees who report bribery and corruption incidents.

Evidence



3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?

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Comments

There is no evidence that the company has either whistleblowing or advice channels.

Evidence



4. Conflict of Interest

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



by	re there procedures in place to identify, declare and manage conflicts of interest, which are overseen or a body or individual ultimately accountable for the appropriate management and handling of onflict of interest cases?
Score	
0	
Comme	ents

There is no evidence that the company has procedures to manage conflicts of interest.

Evidence



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 evidence that the company has a policy on corporate political contributions.
Evidence
No evidence found.



Question
5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?
Score
0
Comments
The company does not disclose details of its political contributions.
Evidence
No evidence found.



5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?

Score

n

Comments

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

Evidence



5.2 Lobbying

Question
5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?
Score
0
Comments
There is no evidence that the company 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
The company does not publish any information on its lobbying aims, topics or activities.
Evidence
No evidence found.
NO EVIDENCE IOUND.



Question
5.2.3 Does the company publish full details of its global lobbying expenditure?
Score
0
Comments
The company does not provide 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 of 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 company requires the involvement of its procurement department in the establishment and/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 reengaging with its suppliers?
Score
0
Comments
There is no evidence that the company conducts due diligence on its supply chain.
Evidence
No evidence found.



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

Score

0

Comments

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

Evidence



6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor?

Score

n

Comments

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

Evidence



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

Score

n

Comments

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

Evidence



7. Agents, Intermediaries and Joint Ventures

7.1 Agents and Intermediaries

Question
7.1.1 Does the company have a clear policy on the use of agents?
Score
0
Comments
The company does not have a clear policy covering the use of agents.
Evidence
No evidence found.



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

Score

n

Comments

The company does not state that it conducts anti-bribery and corruption due diligence on its agents or intermediaries.

Evidence



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



7.1.4 Does the company's anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?

Score

O

Comments

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

Evidence



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 considers incentive structures as a risk factor in agent behaviour.
Evidence
No evidence found.

No evidence found.



7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company? Score Comments The company does not publish any details of the agents currently contracted to act for and/or on behalf of the company. Evidence

against agents?



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

Score

n

Comments

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

Evidence



7.2 Joint Ventures

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



7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture 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 company commits to establishing or implementing anti-bribery and corruption policies or procedures in its joint ventures.

Evidence



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

Score

0

Comments

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

Evidence



8. Offsets

Question

8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?

Score

0

Comments

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

Evidence



8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?

Score

n

Comments

There is no evidence that the company has a procedure to conduct risk-based anti-bribery and corruption due diligence on its offset obligations.

Evidence



8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?

Score

0

Comments

The company does not publish any details of the offset agents, brokers or consultancy firms currently contracted to act with and on behalf of the company's offset programme.

Evidence



Question					
8.4 Does the company publish details about the beneficiaries of its indirect offset projects?					
Score					
0					
Comments					
The company does not publish any details of its offset obligations and/or contracts.					
Evidence					
No evidence found.					



9. High Risk Markets

Question						
9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?						
Score						
0						
Comments						
There is no evidence that the company acknowledges the corruption risks of operating in different markets, or that risk assessment procedures are used to inform the company's operations in high risk markets.						
Evidence						
No evidence found.						



9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?

Score

0

Comments

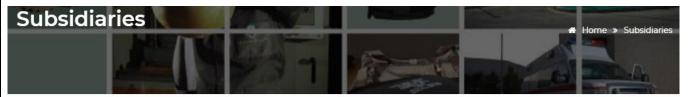
The company publishes a list of its subsidiaries along with links to their respective websites. However, the company receives a score of '0' because the information published is insufficient to satisfy the requirements of score '1'. For example, the company does not distinguish between fully and non-fully consolidated holdings by publishing the percentages owned for each entity, nor does it provide information on the country of incorporation or country of operation for each entity. It is also not clear whether this list is a complete or up-to-date list of all the company's holdings.

Evidence

[6] Subsidiaries (webpage)

Accessed 09/09/2019

https://www.kaddb.com/Subsidiaries



All

WEAPONS & AMMUNITION

LAND COMBAT SYSTEMS

FUTURE TECHNOLOGY PROJECTS

TROOPS GEAR

ELECTRONICS & ELECTRO-OPTICS

SERVICES























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

Score

1

Comments

The company does not disclose detailed information about its beneficial ownership and control structure. However, there is evidence that the company is a government entity affiliated with the Jordan Armed Forces and this information is sufficient to indicate state ownership. The company therefore receives a score of '1'.

Evidence

[5] History (webpage)

Accessed 09/09/2019

https://www.kaddb.com/Pages/History

King Abdullah II Design and Development Bureau (KADDB) was established in 1999, by a royal decree, as an independent government entity affiliated with the Jordan Armed Forces (JAF). The establishment of the Bureau was one of His Majesty's King Abdullah II's priorities the assumption of his constitutional powers to become an Arab defense nucleus in the region.



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

Score

0

Comments

The company does not publish information about its defence sales by customer. Although there is some evidence that the company's main customer is the Jordan Armed Forces, this evidence is in the form of a simple statement rather than a percentage breakdown. The company therefore receives a score of '0'.

Evidence

[5] History (webpage)

Accessed 09/09/2019

https://www.kaddb.com/Pages/History

King Abdullah II Design and Development Bureau (KADDB) was established in 1999, by a royal decree, as an independent government entity affiliated with the Jordan Armed Forces (JAF). The establishment of the Bureau was one of His Majesty's King Abdullah II's priorities the assumption of his constitutional powers to become an Arab defense nucleus in the region.



10. State-Owned Enterprises (SOEs)

Question

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

Score

0

Comments

The SOE does not publish details of its shareholder voting rights, and since it does not provide clear percentage information on its beneficial ownership, the company receives a score of '0'.

Evidence

[5] History (webpage)

Accessed 09/09/2019

https://www.kaddb.com/Pages/History

King Abdullah II Design and Development Bureau (KADDB) was established in 1999, by a royal decree, as an independent government entity affiliated with the Jordan Armed Forces (JAF). The establishment of the Bureau was one of His Majesty's King Abdullah II's priorities the assumption of his constitutional powers to become an Arab defense nucleus in the region.



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

Score

1

Comments

There company publishes some limited information about its objectives to provide support to the Jordan Armed Forces. However, the company receives a score of '1' because its objectives beyond that are unclear and there is no evidence that these objectives are updated on at least an annual basis.

Evidence

[3] Vision and mission

Accessed 09/09/2019

https://www.kaddb.com/Pages/VisionMission

Vision: Leadership in innovation and provision of optimal solutions in the fields of regional defense and security.

Mission: Provide innovative solutions and exploit advanced technologies to serve National Security. To enhance independence and increase competitiveness through the improvement of local production capabilities and human competent.

[5] History (webpage)

Accessed 09/09/2019

https://www.kaddb.com/Pages/History

By being creative, innovative and by harnessing advanced technologies to serve Jordan's national security through prompting self-reliance, building indigenous capabilities, supplying scientific and technical services, increasing the competitiveness of its manufacturing capacity, developing national labor competencies and know-how, adopting best practices, KADDB is dedicated to advancing, applying and facilitating high standards of research development through partnership and innovation with built-in institutional development and growth.



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

Score

0

Comments

The company provides the names of the members of its board of directors on its website. However, it does not provide any further information about each board member, such as whether they are financial beneficiary; an executive; a state representative; or an independent director. It also does not publish information on the nomination and appointment process to the board.

Evidence

[4] Board of directors (webpage)

Accessed 09/09/2019

https://www.kaddb.com/Pages/BoardMembers

Board Of Directors

HE. SAOUD NSAIRAT

CHAIRMAN Chairman of the Board of Directors of King Abdullah II Design and Development Bureau (KADDB)

Read More

BRIG. GEN. HELAL AL KHAWALDEH

VICE CHAIRMAN Chief of the Staff of Strategic Planning and Defense Resources – Jordan Armed Forces (JAF)

Read More

MGEN. MOHAMMAD FARGHAL

MEMBER / DIRECTOR GENERAL Director General of King Abdullah II Design and Development Bureau (KADDB)

Read More

DR. ABDULLAH ZOUBI

MEMBER President of Balqa Applied University

Read More

MR. KHALED AL QURA`AN

MEMBER Director of Financial Management at Hikma Pharmaceuticals

Read More

MR. KHALED SAQQAF

MEMBER Attorney at AlTamimi and Associates for Advocacy

Read More

DR. NAEM AL ODAT

MEMBER
Faculty Member of Tafila
Technical University

Read More

MR. ABDELLATIF AHMAD AL NAJDAWI

MEMBER Secretary General at the Legislation and Opinion Bureau

Read More

MR. SALIM KARADSHEH

MEMBER



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



Question					
10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?					
Score					
0					
Comments					
The company does not publish any details about its management of asset transactions.					
Evidence					
No. of Change Co. of the					
No evidence found.					



List of Evidence & Sources

No	Type (Webpage or Document)	Name	Downloa d Date	Link
01	Webpag e	Values	09/09/201 9	https://www.kaddb.com/Pages/Values
02	Webpag e	CEO message	09/09/201	[Link expired] https://www.kaddb.com/Pages/CEOMessage
03	Webpag e	Vision and mission	09/09/201 9	https://www.kaddb.com/Pages/VisionMission
04	Webpag e	Board of directors	09/09/201 9	https://www.kaddb.com/Pages/BoardMembers
05	Webpag e	History	09/09/201 9	https://www.kaddb.com/Pages/History
06	Webpag e	Subsidiarie s	09/09/201 9	https://www.kaddb.com/Subsidiaries
07	Webpag e	Open Ownership	09/09/201 9	https://register.openownership.org/search?utf8=%E2%9C%93&q=king+abdull ah+II