

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

FINAL ASSESSMENT

POLISH DEFENCE HOLDING

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

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

Section	Number of Questions*	Score Based on Publicly Available Information
1. Leadership and Organisational Culture	4	0/8
2. Internal Controls	6	0/12
3. Support to Employees	7	0/14
4. Conflict of Interest	4	0/8
5. Customer Engagement	7	0/14
6. Supply Chain Management	5	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 publishes a commitment to ethical or anti-bribery and corruption standards.
Evidence
No evidence found.

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 evidence that the company publishes an anti-bribery and corruption or ethics and compliance 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 company has an anti-bribery and corruption programme, nor that a designated board committee or individual board member is responsible for oversight of such activities.
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 the company has an anti-bribery and corruption programme, nor that a specific senior executive or managerial-level employee has ultimate responsibility for implementing and managing such activities.
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
Based on publicly available information, there is no evidence that the company 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
Based on publicly available information, there is no evidence that the company has an anti-bribery and corruption programme which is subject to audit or review.
Evidence
No evidence found.

Question
2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?
Score
0
Comments
There is no evidence that the company has a publicly stated procedure for dealing with bribery and corruption allegations, incidents or whistleblowing reports.
Evidence
No evidence found.

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

Question
2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?
Score
0
Comments
There is no evidence that the company has an investigative procedure which includes a commitment to report material findings to the board or, if necessary, 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
There is no evidence that the company publishes any data on ethical or bribery and corruption investigations or disciplinary actions involving its employees.
Evidence
No evidence found.

3. Support to Employees

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

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

Question
3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?
Score
0
Comments
There is no evidence that the company measures or reviews the efficacy of its anti-bribery and corruption communications or training programme.
Evidence
No evidence found.

Question
3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
0
Comments
There is no evidence that the company's incentive schemes for employees incorporate ethical or anti-bribery and corruption principles.
Evidence
No evidence found.

Question
3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?
Score
0
Comments
There is no evidence that the company 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 company 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 company provides whistleblowing or advice channels for its employees to report suspected incidents of bribery or corruption or seek advice on the company’s anti-corruption activities.
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
Based on publicly available information, there is no evidence that the company has a policy on conflict of interest.
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 company 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 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
Based on publicly available information, there is no evidence that the company has a policy to regulate or prohibit corporate political contributions.
Evidence
No evidence found.

Question
5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?
Score
0
Comments
There is no evidence that the company publishes details of its corporate political contributions.
Evidence
No evidence found.

Question
5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?
Score
0
Comments
There is no evidence that the company has a policy or procedure covering charitable donations or sponsorships.
Evidence
No evidence found.

5.2 Lobbying

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

Question
5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?
Score
0
Comments
There is no evidence that the company publishes any information on its lobbying aims, topics or activities.
Evidence
No evidence found.

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

5.3 Gifts and Hospitality

Question
5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption?
Score
0
Comments
There is no publicly available evidence that the company has a policy or procedure on gifts and 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. The company publishes some information on tenders on its website but there is no clear indication that a specific department is engaged in the oversight of supplier relationships.
Evidence
<p>[3] Tender Information (webpage) Accessed 11/09/2019 https://pho.pl/2019/06/25/zapraszamy-do-zapoznania-sie-z-zapytaniem-ofertowym-z-polskiego-holdingu-obronnego-sp-z-o-o/ Zapraszamy do zapoznania się z zapytaniem ofertowym z Polskiego Holdingu Obronnego sp. z o.o. by admin Cze 25, 2019 PRZETARGI 0 comments</p> <p>Zapytanie ofertowe NAI/W/2255/19 Szanowni Państwo,</p> <p>Uprzejmie informujemy o uruchomieniu postępowania zakupowego na świadczenie usług wsparcia serwisowego oraz administrowanie infrastrukturą informatyczną w Polskim Holdingu Obronnego sp. z o.o., nr postępowania NAI/W/2255/19.</p> <p>Postępowanie prowadzone jest za pośrednictwem Platformy zakupowej eB2B.</p> <p>Link do postępowania: KLIKNIJ TUTAJ</p> <p>Termin składania ofert został wyznaczony do dnia 26.07.2019 r. do godz. 12:00</p> <p>Zapytanie ofertowe NBB/W/2042/19 Szanowni Państwo,</p> <p>Uprzejmie informujemy o uruchomieniu postępowania zakupowego na dostawę i instalację niezbędnych elementów oraz uruchomienie stacji monitorowania systemów alarmowych, nr postępowania NBB/W/2042/19</p> <p>Link do postępowania: KLIKNIJ TUTAJ</p> <p>Termin składania ofert został wyznaczony do dnia 11.07.2019 r. do godz. 16:00</p> <p>Zapytanie ofertowe NAW/1901/19 usługi porządkowe Szanowni Państwo,</p> <p>Uprzejmie informujemy o uruchomieniu postępowania zakupowego pn. „Zapytanie ofertowe NAW/1901/19 usługi porządkowe”, nr postępowania NAW/1901/19.</p> <p>Postępowanie prowadzone jest za pośrednictwem Platformy zakupowej eB2B.</p> <p>Link do postępowania: KLIKNIJ TUTAJ</p> <p>Termin składania ofert został wyznaczony do dnia 08.07.2019 r. (poniedziałek), godz. 12:00</p>

Translation:

We invite you to read the requests from the Polish defence holding SP. o ..
by admin | June 25, 2019 | TENDERS | 0 comments

Request NAI/V/2255/19
Dear Ladies And Gentlemen,

We kindly inform you about the start of procurement procedures for the provision of technical support services and administration of IT infrastructure in the Polish Defence holding company LLC, NAI/W/2255/19.

The proceedings are conducted through the platform of the online store eB2B.

Action link: [CLICK HERE](#)

The deadline for applications is scheduled for 26.07.2019 by 12:00 hours

Request NBB/In/2042/19
Dear Ladies And Gentlemen,

To announce the start of procurement procedures by the buyer for the supply and installation of the required elements and the sub-station monitoring of alarm systems, No. behaviour NBB/In/2042/19

Action link: [CLICK HERE](#)

The deadline for applications is scheduled for 11.07.2019 by 16: 00

Request for / B / 1901 / 19 cleaning services
Dear Ladies And Gentlemen,

We inform you about the start of procurement procedures by the buyer. Request "/IN/1901/19 cleaning services", case number AT/BY/1901/19.

The proceedings are conducted through the platform of the online store eB2B.

Action link: [CLICK HERE](#)

The deadline for applications is scheduled for 08.07.2019 day G. (Monday), at 12:00 am

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

Question
6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?
Score
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
No evidence found.

Question
6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor?
Score
0
Comments
There is no evidence that the company takes steps to ensure that the substance of its anti-bribery and corruption programme and standards are required throughout the supply chain.
Evidence
No evidence found.

Question
6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or anti-bribery and corruption investigations 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
0
Comments
There is no publicly available evidence that the company has a policy on the use of agents.
Evidence
No evidence found.

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

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

Question
7.1.4 Does the company’s anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?
Score
0
Comments
There is no evidence that the company includes anti-bribery and corruption clauses in its contracts with agents and intermediaries.
Evidence
No evidence found.

Question
7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
0
Comments
There is no evidence that the company considers incentive structures as a risk factor in agent behaviour.
Evidence
No evidence found.

Question
7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company?
Score
0
Comments
There is no evidence that the company publishes any details of the agents currently contracted to act for and/or on its behalf.
Evidence
No evidence found.

Question
7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or bribery and corruption-related investigations, incidents or the associated disciplinary actions involving its agents.
Evidence
No evidence found.

7.2 Joint Ventures

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

Question
7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture 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
No evidence found.

Question
7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?
Score
0
Comments
There is no evidence that the company commits to take an active role in preventing bribery and corruption in its joint ventures.
Evidence
No evidence found.

8. Offsets

Question
8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?
Score
0
Comments
There is no evidence that the company addresses the corruption risks associated with offset contracting, nor that a dedicated body, department or team is responsible for oversight of the company's offset activities.
Evidence
No evidence found.

Question
8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?
Score
0
Comments
There is no evidence that the company conducts anti-bribery and corruption due diligence on its offset obligations.
Evidence
No evidence found.

Question
8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?
Score
0
Comments
There is no evidence that the company publishes any details of the offset agents, brokers or consultancy firms currently contracted to act with and on behalf of its offset programme.
Evidence
No evidence found.

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

9. High Risk Markets

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



Question
9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?
Score
0
Comments
There is no evidence that the company publishes a list of its subsidiaries or other affiliated entities.
Evidence
No evidence found.

Question												
9.3 Does the company disclose its beneficial ownership and control structure?												
Score												
1												
Comments												
<p>There is evidence that the company discloses information about its beneficial owners with a stake higher than 25%. The company's ownership information indicates that two national state bodies in Poland hold more than 99% of its shares, indicating that it is a partially state-owned enterprise.</p> <p>However, the company receives a score of '1' because there is no evidence that this information is published in a freely accessible corporate register or global beneficial ownership database.</p>												
Evidence												
<p>[1] About the Company (Webpage) Accessed 11/09/2019 https://pho.pl/#o-firmie STRUKTURA WŁASNOŚCI:</p> <table> <tr> <td>Skarb Państwa:</td> <td>84,08%</td> </tr> <tr> <td>Agencja Rozwoju Przemysłu SA:</td> <td>15,76%</td> </tr> <tr> <td>Pozostali udziałowcy:</td> <td>0,16%</td> </tr> </table> <p>Od grudnia 2015 r. uprawnienia właścicielskie wykonuje Minister Obrony Narodowej.</p> <p>Translation:</p> <p>OWNERSHIP STRUCTURE:</p> <table> <tr> <td>Treasury:</td> <td>84.08%</td> </tr> <tr> <td>Industrial Development Agency SA:</td> <td>15.76%</td> </tr> <tr> <td>Other shareholders:</td> <td>0.16%</td> </tr> </table> <p>Since December 2015, ownership rights have been exercised by the Minister of National Defense.</p>	Skarb Państwa:	84,08%	Agencja Rozwoju Przemysłu SA:	15,76%	Pozostali udziałowcy:	0,16%	Treasury:	84.08%	Industrial Development Agency SA:	15.76%	Other shareholders:	0.16%
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Treasury:	84.08%											
Industrial Development Agency SA:	15.76%											
Other shareholders:	0.16%											

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

10. State-Owned Enterprises (SOEs)

Question												
10.1 Does the SOE publish a breakdown of its shareholder voting rights?												
Score												
0												
Comments												
There is no evidence that the company publishes any details of its shareholder voting rights. The company indicates that over 99% of its shares are held by Polish state bodies and states that the Minister of National Defence exercises “ownership rights” over the company, but it is not clear that this relates to voting rights.												
Evidence												
<p>[1] About the Company (Webpage) Accessed 11/09/2019 https://pho.pl/#o-firmie STRUKTURA WŁASNOŚCI:</p> <table> <tr> <td>Skarb Państwa:</td> <td>84,08%</td> </tr> <tr> <td>Agencja Rozwoju Przemysłu SA:</td> <td>15,76%</td> </tr> <tr> <td>Pozostali udziałowcy:</td> <td>0,16%</td> </tr> </table> <p>Od grudnia 2015 r. uprawnienia właścicielskie wykonuje Minister Obrony Narodowej.</p> <p>Translation:</p> <p>OWNERSHIP STRUCTURE:</p> <table> <tr> <td>Treasury:</td> <td>84.08%</td> </tr> <tr> <td>Industrial Development Agency SA:</td> <td>15.76%</td> </tr> <tr> <td>Other shareholders:</td> <td>0.16%</td> </tr> </table> <p>Since December 2015, ownership rights have been exercised by the Minister of National Defense.</p>	Skarb Państwa:	84,08%	Agencja Rozwoju Przemysłu SA:	15,76%	Pozostali udziałowcy:	0,16%	Treasury:	84.08%	Industrial Development Agency SA:	15.76%	Other shareholders:	0.16%
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Industrial Development Agency SA:	15.76%											
Other shareholders:	0.16%											

Question
10.2 Are the SOE's commercial and public policy objectives publicly available?
Score
1
Comments
<p>The company publishes some information about its objectives, which include commercial objectives to be an industry leader as well as national objectives to serve the Polish state.</p> <p>However, the company receives a score of '1' because its objectives are unclear and there is no evidence that they are updated on an annual basis.</p>
Evidence
<p>[1] About the Company (Webpage) Accessed 11/09/2019 https://pho.pl/#o-firmie</p> <p>Polski Holding Obronny to podmiot który do 2013 roku (pod marką Bumar) przez blisko 45 lat prowadził działalność związaną z obrotem specjalnym, eksportem uzbrojenia i dużą aktywnością na rynkach zagranicznych.</p> <p>Wskutek historycznych zmian otoczenia biznesowego i zmiany strategii, obecna działalność firmy oparta jest na trzech filarach: kluczowym – świadczenie kompleksowych usług i rozwiązań związanych z segmentem bezpieczeństwa wraz z cyberbezpieczeństwem, działalność handlowa na rynkach krajowych i zagranicznych oraz aktywność na rynku nieruchomości. Nasza strategia wyznacza kierunek działań na przyszłość. Chcemy być świadomie wybieranym partnerem ze względu na naszą wiarygodność i innowacyjność modelu biznesowego. Głównym celem jest oferowanie najwyższej jakości usług i produktów oraz uzyskanie pozycji lidera branży, zabezpieczającego strategiczne obiekty dla bezpieczeństwa Państwa i gospodarki narodowej.</p> <p>[...]</p> <p>NASZA WIZJA I MISJA</p> <div style="background-color: #1a2b3c; color: white; padding: 10px;">  <p>WIZJA</p> <p>Głównym celem jest oferowanie najwyższej jakości usług i produktów oraz uzyskanie pozycji lidera branży budującego przewagę konkurencyjną w zakresie kompetencji, technologii i rozwoju.</p>  <p>MISJA</p> <p>Chcemy być świadomie wybieranym partnerem ze względu na naszą wiarygodność i innowacyjność modelu biznesowego.</p> </div> <p>[...]</p>

ROZWÓJ RYNKU

Bazując na wieloletnim doświadczeniu biznesowym, Polski Holding Obrony integruje produkty i usługi dostarczane przez polskich dostawców w kompletne systemy i zoptymalizowane rozwiązania, które stanowią odpowiedź na wyzwania przed jakimi stoją nasi klienci. W naszej ofercie znajdują się innowacyjne produkty, systemy i usługi dla przemysłu, energetyki, budownictwa, transportu, sił zbrojnych, służb mundurowych i odbiorców cywilnych. Możemy pochwalić się realizacją wielu skomplikowanych projektów handlowych i modernizacyjnych na całym świecie. Jesteśmy zaufanym partnerem biznesowym.

Translation:

The Polish defence holding is a subject which till 2013 (under The Bumar brand) nearly 45 years conducted the activity connected with a special turnover, export of arms and big activity in the foreign markets.

As a result of historical changes in the business environment and changes in strategy, the company's current activities are based on three pillars: the key – providing comprehensive services and solutions related to the security segment together with cybersecurity, trading activities in the markets, domestic and foreign, as well as activity in the real estate market. Our strategy sets the course for the future. We want to be a consciously chosen partner because of our robust and innovative business model. The main objective is to provide high quality services and products, as well as to achieve the position of industry leader, security strategic facilities to protect the State and the national economy.

[...]

OUR VISION AND MISSION

VISION

The main objective is to provide high quality services and products, and to obtain items an industry leader that creates competitive advantages in competence, technology and development.

MISSION

We want to be a consciously chosen partner because of our trust and business model innovation.

[...]

MARKET DEVELOPMENT

Based on years of business experience, Polish Defense holding combines products and services provided by Polish suppliers into complete systems and optimized solutions that are a response to the challenges faced by our customers. Our portfolio includes innovative products, systems and services for industry, energy, construction, transportation, military, law enforcement and civilian clients. We can boast of implementing many complex trade and modernization projects around the world.

We are a reliable business partner.

Question
10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?
Score
0
Comments
<p>There is evidence that the company publishes some information about its board members, including the name and position of each individual. However, the company receives a score of '0' because it does not provide further details such as whether each board member is a financial beneficiary, an executive, a state representative or an independent director. In addition, there is no evidence that the company publishes information on the board nomination or appointment process.</p>
Evidence
<p>[1] About the Company (Webpage) Accessed 11/09/2019 https://pho.pl/#o-firmie ZARZĄD:</p> <p>Robert Góral – Prezes Zarządu</p> <p>RADA NADZORCZA: Wojciech Arndt – Przewodniczący Andrzej Jarema – Wiceprzewodniczący Jakub Zacharjasz – Sekretarz Agnieszka Glapiak – Członek Łukasz Kudlicki – Członek</p> <p>Translation:</p> <p>MANAGEMENT:</p> <p>Robert Góral - President of the Board</p> <p>BOARD OF DIRECTORS: Wojciech Arndt - Chairman Andrzej Jarema - Vice-president Jakub Zacharjasz - Secretary Agnieszka Glapiak - Member Łukasz Kudlicki - Member</p>

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

Question
10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?
Score
0
Comments
There is no evidence that the company publishes any information about its management of asset transactions.
Evidence
<p>[4] Zaproszenie do zakupu zbędnych składników majątku / Invitation to purchase unnecessary assets (Webpage) Accessed 19/09/2019 https://pho.pl/2019/02/15/zaproszenie-do-zakupu-zbednych-skladnikow-majatku/ ZAPROSZENIE do zakupu zbędnych składników majątku</p> <p>Polski Holding Obronny sp. z o.o. zaprasza do złożenia oferty na zakup zbędnych składników majątku znajdujących się w Warszawie przy ul. Kompanii AK „Goplana” 4 (dawna ul. Posag 7 Panien 8a).</p> <p>Wykaz sprzedawanych składników majątku stanowi Załącznik nr 1 do niniejszego Zaproszenia.</p> <p>Istnieje możliwość dokonania wizji lokalnej od dnia 01.03.2019 r. Osobą odpowiedzialną za prezentację składników majątku jest – Anna Suchta</p> <p>Translation:</p> <p>INVITATION to purchase unnecessary assets</p> <p>Polski Holding Obronny sp. Z o. O. Invites you to submit offers for the purchase of unnecessary assets located in Warsaw at ul. Kompania AK "Goplana" 4 (former ul. Posag 7 Panien 8a).</p> <p>The list of assets sold is attached as Annex 1 to this Invitation.</p> <p>It is possible to make a local visit from 01/03/2019. The person responsible for presenting the assets is Anna Suchta</p>

List of Evidence & Sources

No.	Type <i>(Webpage or Document)</i>	Name	Download Date	Link
01	Webpage	About The Company	11/09/19	[https://pho.pl/#o-firmie]
02	Webpage	Open Ownership Search	11/09/19	[https://register.openownership.org/search?utf8=%E2%9C%93&q=Polski+Holding+Obronny]
03	Webpage	Tender Information	11/09/19	[https://pho.pl/2019/06/25/zapraszamy-do-zapoznania-sie-z-zapytaniem-ofertowymi-z-polskiego-holdingu-obronnego-sp-z-o-o/]
04	Webpage	Invitation to purchase unnecessary assets	19/09/19	[https://pho.pl/2019/02/15/zaproszenie-do-zakupu-zbednych-skladnikow-majatku/]