

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

FINAL ASSESSMENT

TURKISH AEROSPACE INDUSTRIES

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	1/8
2. Internal Controls	6	0/12
3. Support to Employees	7	1/14
4. Conflict of Interest	4	1/8
5. Customer Engagement	7	1/14
6. Supply Chain Management	5	1/10
7. Agents, Intermediaries and Joint Ventures	10	0/20
8. Offsets	4	0/8
9. High Risk Markets	4	2/8
10. State-Owned Enterprises	5	1/10
TOTAL		8/112
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
The company publishes a statement endorsed by its leadership that commits to ethical business conduct and principles, but it does not explicitly mention anti-bribery and corruption.
Evidence
<p>[5] Etik Yönetimi/ Ethics Management (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakkimizda/etik-yonetimi Değerli Çalışma Arkadaşlarım,</p> <p>Türk Havacılık ve Uzay Sanayii olarak kurulduğumuz günden bu yana temel değerlerine bağlı, iş ahlakı yüksek, güvenilir bir kurum olmanın gururunu taşımaktayız.</p> <p>Sahip olduğumuz yeteneklerimiz ve ülkemizin güvenliğine hizmet eden projelerimizle savunma sanayiinde büyürken, en önemli varlığımız olan çalışanlarımızın değerlerimize bağlılığı bizleri bugüne dek daha da güçlü kıldı ve ileriye taşıdı. Kurumsal değerlerimizi ve etik ilkelerimizi korumak, geliştirmek ve aramıza katılan yeni arkadaşlarımıza aktararak kurum kültürümüzün sürekliliğini sağlamak en önemli görevlerimizden biri oldu.</p> <p>Bu amaçla Şirketimiz politikaları, değerleri ve ilkeleri ile bütünlük içinde olan Etik El Kitabımız yeniden gözden geçirilmiştir.</p> <p>Türk Havacılık ve Uzay Sanayii ailesi olarak Etik El Kitabımıza azami derecede özen göstereceğimize, kurumumuzu en doğru şekilde temsil edeceğimize, iş süreçlerimizi ve iş yapış şekillerimizi en doğru şekilde yöneteceğimize, müşterilerimiz ve paydaşlarımızla güvene dayalı ilişkiler kuracağımıza ve sonuçta kurumumuza değer katacağımıza olan inancım tamdır.</p> <p>Prof. Dr. Temel KOTİL Genel Müdür</p> <p>Translation:</p> <p>My dear colleagues,</p> <p>From the day we were founded as Turkish Aviation and Aerospace Industries, we are carrying the pride of being faithful to our core values, having a high work ethic and being credible.</p> <p>While we grow in the defence industry with the abilities we possess and projects that contribute to our national security, the adherence of our employees to our values has been our greatest asset and it made us more powerful and it carried us forward. Protecting our ethical principles and corporate values, develop them and passing them on to our new colleagues to sustain our corporate culture has been one of our most important tasks.</p> <p>With that goal in mind, our Ethics Guidebook which is in accordance with our corporate policies, values and principles was reviewed once again.</p> <p>As Turkish Aviation and Aerospace Industry family, we promise that we will show utmost care to our Ethics Guidebook, that we will represent our corporation in truest way, that we will manage our work processes and how truly we conduct our work, and I have full belief that we will establish relationships which are based on trust with our partners and shareholders which consequently will add value to our company.</p>

Prof. Dr. Temel KOTİL
General Director

[4] Etik Kodlar / Ethical Codes (Webpage)

Accessed 27/09/2019

<https://www.tusas.com.tr/kurumsal/hakkimizda/etik-kodlar>

- Tüm iş ve işlemlerinde ilgili taraflara karşı şeffaf, adil, sorumlu ve hesap verebilir bir tutum içinde olmayı benimserler: TUSAŞlılar sorumluluklarının sadece yapılan işi veren makama karşı değil, katkıda bulunulan ürünleri ve sundukları hizmeti kullanan herkese karşı olduğunu, havacılık sektöründe ürün kalitesinin insan hayatıyla birebir ilgili olduğunu bir an bile akıldan çıkarmazlar. TUSAŞ ürünleri hakkında gelecek şikayetleri ciddiyetle dinleyip cevap vermeyi hesap verebilir bir yönetim tarzı olarak benimser ve bunu dikkate alarak işlerini yaparlar. TUSAŞlı tüm ilişkilerinde her türlü yolsuzluk ve rüşvet uygulamalarından uzak durur ve TUSAŞ için iş gören üçüncü kişilerin de TUSAŞ için iş görürken yolsuzluk ve rüşvet uygulamalarından uzak durması için makul özeni gösterir.
- Kendileri ve yakınları lehine işlem yapmazlar: TUSAŞlı görevi kapsamında aile bireyleriyle, yakınlarıyla veya ilişkide bulunulan diğer üçüncü şahıslarla hiçbir surette karşılıklı veya karşılıksız menfaat sağlayan iş ilişkisine girmez.
- Yürütülen faaliyetlerle ilgili bilgi, belge ve kayıtlar ile hesapları düzenli, tam ve doğru olarak tutar, muhafaza ederler: TUSAŞlılar meblağı ne olursa olsun hiç bir amaçla gerçeğe aykırı kayıt yapmazlar, denetimden sorumlu kişilerin çalışmalarını sürdürebilmeleri için destek olur, ihtiyaç duyulan hallerde gereken imkanları ve yardımı sağlarlar.

Translation:

- In their every work and transaction, they embody transparent, fair, responsible and accountable attitude towards respectable parties: People of TAI do not forget even for one moment that their responsibilities are not just for the office which gives them the work, but for everyone who uses their products and services which are provided by them, and they do not forget that the product quality in the aviation industry is directly related to human lives. About TAI products, listening to future complaints solemnly and answering them is an accountable management style embodied by them, and they do their job with regards to this. A person from TAI in all their relationships stays away from corrupt practices and bribery and they also show care for the third parties who are working for TAI to stay away from the practices of corruption and bribery while they work for TAI.
- They do not engage in transactions for their own interest or the interest of their relatives: A person from TAI shall under no circumstances start a business relationship that benefits their family members, relatives or third parties in a mutual or non-mutual relationship.
- They keep the record of the documents and information about every action in an orderly, complete and true manner and safeguard them: People from TAI regardless of the amount, with whatever purpose, will never keep records in contradiction with truth, they support the work of the people who are charged with supervision, and they provide the resources and help whenever needed.

[6] Sorumluluklarımız / Our Responsibilities (Webpage)

Accessed 27/09/2019

<https://www.tusas.com.tr/kurumsal/hakkimizda/sorumluluklarimiz>

TUSAŞlılara, TUSAŞ ortaklarına, Diğer Paydaşlarımıza, rakiplerimize, topluma ve insanlığa aşağıda sıralanan sorumluluklarımızı yerine getirmeye özen gösteririz.

Yasal Sorumluluklarımız

TUSAŞ bütün iş ve işlemlerinde Türkiye Cumhuriyeti Anayasası, yasaları ve tüm mevzuata uygun iş yapmayı benimser ve uygular. Ek olarak, uluslararası anlaşmalara uymayı, iş yaptığı yabancı ülkelerin sözleşmeler kapsamında üzerinde karşılıklı anlaşılmış yasal çerçevelerine uymayı da bir iş etiği ilkesi olarak benimser. Çalışma hayatında tüm faaliyet ve işlemler, yasa ve yönetmelik yükümlülükleri çerçevesinde yürütülür. Yasal düzenleyici kurum ve kuruluşlara, doğru, tam ve anlaşılabilir bilgiler zamanında sunulur.

Faaliyet ve işlemler yürütülürken kamu kurum ve kuruluşlarına, gerçek ve tüzel kişilere, sivil toplum örgütlerine karşı herhangi bir menfaat beklentisi olmaksızın eşit mesafede durulur ve sözleşme gerekleri, ahlaki ve endüstriyel standart yükümlülükler bu sorumluluk bilinci ile yerine getirilir.

Bu faaliyetlere ilişkin bilgi, belge ve kayıtlar düzenli ve eksiksiz olarak tutulur, muhafaza edilir.

Ahlaki Sorumluluklarımız

En başta gelen ahlaki sorumluluğumuz TUSAŞ'ın bütün birimlerinde ahlaki bir çalışma ortamının oluşturulmasıdır. Adil ve dürüst işletmecilik uygulamaları, hem çalışanlar hem de yöneticiler açısından davranış kurallarında yüksek bir standardın tutturulması ahlaki bir hedef olarak benimsenir. Doğrudan veya dolaylı olarak, rüşvet, komisyon almak, vermek, taahhüt etmek veya teklif etmek, maddi veya gayri maddi herhangi bir menfaat sağlamak hiçbir şart altında kabul edilemez. Bu konularda makul özeni göstermeyen tüm çalışanlar için TUSAŞ disiplin kuralları doğrultusunda en ağır yaptırım uygulanır.

TUSAŞlılara Karşı Sorumluluklarımız

TUSAŞlılar, TUSAŞ'ın insan gücünü, geleceğini ve üretim potansiyelini temsil eder. İnsanların çalışmaktan haz ve gurur duyacağı bir iş ortamı oluşturmak hedefimizdir. TUSAŞlıların birbirleri arasında veya yönetimle oluşabilecek muhtemel sorunlarının çözümü için ivedilik ve hassasiyetle hareket edilir. TUSAŞ yöneticileri bu Etik El Kitabında yazılan değer ve ilkelere bağlı kalarak çalışanlara eşit ve adil muamele etmekle yükümlüdürler. Yaptığı iş ne olursa olsun her TUSAŞlı'nın faaliyetlerimize doğrudan ya da dolaylı bir katkısının olduğu göz önüne alınarak değerli olduğu hissettirilir. Adil bir insan kaynakları sisteminin yerleştirilmesi, esnek bir iletişim mekanizmasının oluşturulması ve hakkaniyetli bir ödül-ceza sisteminin benimsenmesi insan kaynakları politikamızın esasını oluşturur.

Translation:

We will take care to uphold our responsibilities which are listed below to the people from TAI, to TAI's partners, to other shareholders, to our competitors, to the society and to humanity.

Our Legal Responsibilities

TAI in its all work and transactions embodies and implements its work according to the Turkish Republic's Constitution, to its law and legislation. Also, it abides by international laws, and adheres to the mutually agreed laws of the countries that it works with which are bound by a prior agreement on work ethic principles. In work life, all actions and transactions are conducted according to legal and regulatory responsibilities. To all institutions and organizations that regulate laws, true, complete and clear information is provided at the right time.

While actions and transactions are being done, with public institutions and organizations, real people and legal entities, non-governmental organizations, we stand at an equal distance from all the parties without any financial expectations and all the requirements of the agreements, moral and industrial requirements are fulfilled with this sense of responsibility.

All the records, documents and information are kept in an orderly fashion and without any deficiency, then safeguarded.

Our Moral Responsibilities

Our primary moral responsibility is to ensure the establishment of a moral working environment in all of the units of TAI. Fair and honest administrative practices to achieve a high standard in the rules of behaviour is a moral aim adopted by all the employees and managers. Direct or indirect bribery, taking and giving cuts, promising or proposing them, gaining financial or non-financial benefit are under no circumstances acceptable. For those employees who do not show their utmost care for these principles, the most severe punishment under TAI's disciplinary code is imposed.

Our Responsibilities to the People from TAI

People of TAI represent the workforce, the future and the potential of production of TAI. To establish an environment in which people would be proud to work and enjoy working is our aim. For the solution of the possible problems that might arise between the employees of TAI or between the employee and management, we act swiftly and sensibly. TAI managers are responsible to treat each of the employees equally and fairly, in accordance with this Ethical Guidebook and its values and principles.

Whatever the work of the employee is, every person from TAI is to be treated to make them feel valuable, in relation to their direct or indirect contributions. Establishment of a fair human relations system, creating a flexible mechanism of communication and the adoption of a just reward and punishment system constitutes the essence of our human relations policy.

[1] About Us (Webpage)

Accessed 20/09/2019

<https://www.tusas.com.tr/en/corporate/about-us>

Ethic Codes

Turkish Aerospace takes proper behaviour in accordance with corporate values and business ethics as the main ethical principle in all domains. Turkish Aerospace places emphasis on being objective and transparent in all business interactions and acknowledges accountability as a responsibility.

Turkish Aerospace managers and employees regard company benefits above personal interests and behave responsibly in relation to all shareholders and to the natural environment.

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> <p>a) All employees, including staff and leadership of subsidiaries and other controlled entities; b) All board members, including non-executive directors.</p>
Score
1
Comments
<p>The company publishes an anti-bribery and corruption policy, which applies to managers and employees.</p> <p>However, there is no evidence that the policy prohibits payments to public officials and facilitation payments. Additionally, there is no evidence that the company's policy applies to staff and leadership of subsidiaries and other controlled entities, or that the policy applies to all board members, including non-executive directors.</p>
Evidence
<p>[6] Sorumluluklarımız / Our Responsibilities (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakimizda/sorumluluklarimiz TUSAŞlılara, TUSAŞ ortaklarına, Diğer Paydaşlarımıza, rakiplerimize, topluma ve insanlığa aşağıda sıralanan sorumluluklarımızı yerine getirmeye özen gösteririz.</p> <p>Yasal Sorumluluklarımız</p> <p>TUSAŞ bütün iş ve işlemlerinde Türkiye Cumhuriyeti Anayasası, yasaları ve tüm mevzuata uygun iş yapmayı benimser ve uygular. Ek olarak, uluslararası anlaşmalara uymayı, iş yaptığı yabancı ülkelerin sözleşmeler kapsamında üzerinde karşılıklı anlaşılmış yasal çerçevelerine uymayı da bir iş etiği ilkesi olarak benimser. Çalışma hayatında tüm faaliyet ve işlemler, yasa ve yönetmelik yükümlülükleri çerçevesinde yürütülür. Yasal düzenleyici kurum ve kuruluşlara, doğru, tam ve anlaşılabilir bilgiler zamanında sunulur.</p> <p>Faaliyet ve işlemler yürütülürken kamu kurum ve kuruluşlarına, gerçek ve tüzel kişilere, sivil toplum örgütlerine karşı herhangi bir menfaat beklentisi olmaksızın eşit mesafede durulur ve sözleşme gerekleri, ahlaki ve endüstriyel standart yükümlülükler bu sorumluluk bilinci ile yerine getirilir.</p> <p>Bu faaliyetlere ilişkin bilgi, belge ve kayıtlar düzenli ve eksiksiz olarak tutulur, muhafaza edilir.</p> <p>Ahlaki Sorumluluklarımız</p> <p>En başta gelen ahlaki sorumluluğumuz TUSAŞ'ın bütün birimlerinde ahlaki bir çalışma ortamının oluşturulmasıdır. Adil ve dürüst işletmecilik uygulamaları, hem çalışanlar hem de yöneticiler açısından davranış kurallarında yüksek bir standardın tutturulması ahlaki bir hedef olarak benimsenir. Doğrudan veya dolaylı olarak, rüşvet, komisyon almak, vermek, taahhüt etmek veya teklif etmek, maddi veya gayri maddi herhangi bir menfaat sağlamak hiçbir şart altında kabul edilemez. Bu konularda makul özeni göstermeyen tüm çalışanlar için TUSAŞ disiplin kuralları doğrultusunda en ağır yaptırım uygulanır.</p> <p>TUSAŞlılara Karşı Sorumluluklarımız TUSAŞlılar, TUSAŞ'ın insan gücünü, geleceğini ve üretim potansiyelini temsil eder. İnsanların çalışmaktan haz ve gurur duyacağı bir iş ortamı oluşturmak hedefimizdir. TUSAŞlıların birbirleri arasında veya yönetimle oluşabilecek muhtemel sorunlarının çözümü için ivedilik ve hassasiyetle hareket edilir. TUSAŞ yöneticileri bu Etik El Kitabında yazılan değer ve ilkelere bağlı kalarak çalışanlara eşit ve adil muamele etmekle yükümlüdürler. Yaptığı iş ne olursa olsun her TUSAŞlı'nın faaliyetlerimize doğrudan ya da dolaylı bir katkısının olduğu göz önüne alınarak değerli olduğu hissettirilir. Adil bir insan kaynakları sisteminin yerleştirilmesi, esnek bir iletişim mekanizmasının oluşturulması ve hakkaniyetli bir ödül-ceza sisteminin benimsenmesi insan kaynakları politikamızın esasını oluşturur.</p>
Translation:

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Whatever the work of the employee is, every person from TAI is to be treated in a way that makes them feel valuable, in relation to their direct or indirect contributions. Establishment of a fair human relations system, creating a flexible mechanism of communication and the adoption of a just reward and punishment system constitutes the essence of our human relations policy.

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[4] Etik Kodlar/ Ethical Codes (Webpage)

Accessed 27/09/2019

<https://www.tusas.com.tr/kurumsal/hakimizda/etik-kodlar>

- Tüm iş ve işlemlerinde ilgili taraflara karşı şeffaf, adil, sorumlu ve hesap verebilir bir tutum içinde olmayı benimserler: TUSAŞ'lılar sorumluluklarının sadece yapılan işi veren makama karşı değil, katkıda bulunan ürünleri ve sundukları hizmeti kullanan herkese karşı olduğunu, havacılık sektöründe ürün kalitesinin insan hayatıyla birebir ilgili olduğunu bir an bile akıldan çıkarmazlar. TUSAŞ ürünleri hakkında gelecek şikayetleri ciddiyle dinleyip cevap vermeyi hesap verebilir bir yönetim tarzı olarak benimser ve bunu dikkate alarak işlerini yaparlar. TUSAŞ'lı tüm ilişkilerinde her türlü yolsuzluk ve rüşvet uygulamalarından uzak durur ve TUSAŞ için iş gören üçüncü kişilerin de TUSAŞ için iş görürken yolsuzluk ve rüşvet uygulamalarından uzak durması için makul özeni gösterir.

Translation:

- In their every work and transaction, they embody transparent, fair, responsible and accountable attitude towards respectable parties: People of TAI do not forget even for one moment that their responsibilities are not just for the office which gives them the work, but for everyone who uses their products and services which are provided by them, and also they do not forget that the product quality in the aviation industry is directly related to human lives. In relation to TAI products, listening to future complaints solemnly and answering them is an accountable management style embodied by them, and they do their job with regards to this. A person from TAI in all their relationships stays away from corrupt practices and bribery and they also show care for the third parties who are working for TAI to stay away from the practices of corruption and bribery while they work for TAI.

Question
1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?
Score
0
Comments
There is no evidence that the company has a designated board committee or individual board member responsible for its anti-bribery and corruption programme.
Evidence
No evidence found.

Question
1.4. Is responsibility for implementing and managing the company's anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company's programme?
Score
0
Comments
There is no evidence that a specific managerial-level employee has ultimate responsibility for implementing and managing the company's anti-bribery and corruption programme.
Evidence
[3] Management (Webpage) Accessed 20/09/2019 https://www.tusas.com/en/corporate/management Head of Legal Affairs Cahit Bilge AKAL (Deputy)

2. Internal Controls

Question
2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?
Score
0
Comments
There is no evidence that the company has a formal risk assessment procedure which is used to inform the company's anti-bribery and corruption programme.
Evidence
No evidence found.

Question
2.2. Is the company's anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations?
Score
0
Comments
There is no evidence that the company's anti-bribery and corruption programme is subject to audit or review.
Evidence
No evidence found.

Question
2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?
Score
0
Comments
There is no evidence that the company has a publicly stated procedure for dealing with bribery and corruption allegations, incidents or whistleblowing reports.
Evidence
<p>[6] Sorumluluklarımız / Our Responsibilities (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakkimizda/sorumluluklarimiz Ahlaki Sorumluluklarımız</p> <p>En başta gelen ahlaki sorumluluğumuz TUSAŞ'ın bütün birimlerinde ahlaki bir çalışma ortamının oluşturulmasıdır. Adil ve dürüst işletmecilik uygulamaları, hem çalışanlar hem de yöneticiler açısından davranış kurallarında yüksek bir standardın tutturulması ahlaki bir hedef olarak benimsenir. Doğrudan veya dolaylı olarak, rüşvet, komisyon almak, vermek, taahhüt etmek veya teklif etmek, maddi veya gayri maddi herhangi bir menfaat sağlamak hiçbir şart altında kabul edilemez. Bu konularda makul özeni göstermeyen tüm çalışanlar için TUSAŞ disiplin kuralları doğrultusunda en ağır yaptırım uygulanır.</p> <p>TUSAŞlılara Karşı Sorumluluklarımız TUSAŞlılar, TUSAŞ'ın insan gücünü, geleceğini ve üretim potansiyelini temsil eder. İnsanların çalışmaktan haz ve gurur duyacağı bir iş ortamı oluşturmak hedefimizdir. TUSAŞlıların birbirleri arasında veya yönetimle oluşabilecek muhtemel sorunlarının çözümü için ivedilik ve hassasiyetle hareket edilir. TUSAŞ yöneticileri bu Etik El Kitabında yazılan değer ve ilkelere bağlı kalarak çalışanlara eşit ve adil muamele etmekle yükümlüdürler. Yaptığı iş ne olursa olsun her TUSAŞlı'nın faaliyetlerimize doğrudan ya da dolaylı bir katkısının olduğu göz önüne alınarak değerli olduğu hissettirilir. Adil bir insan kaynakları sisteminin yerleştirilmesi, esnek bir iletişim mekanizmasının oluşturulması ve hakkaniyetli bir ödül-ceza sisteminin benimsenmesi insan kaynakları politikamızın esasını oluşturur.</p> <p>TUSAŞ, çalışanlara dürüst ve adil bir yaklaşımın sağlandığı, samimi ve açık bir iletişimin yürütüldüğü, ayrımcı olmayan, güvenli ve sağlıklı bir çalışma ortamı taahhüt eder. TUSAŞ, iş güvenliği uygulamaları ile ilgili olarak yönetimin, TUSAŞlıların, tedarikçilerin ve Müşterilerin ortak çabalarının gerekli olduğunun farkındadır. TUSAŞ'ta dil, ırk, renk, cinsiyet, siyasi düşünce, inanç, din, mezhep, yaş, hamilelik, sakatlık veya malullük durumları nedeni ile ayrımcılık yapılmasına müsaade edilmez. TUSAŞlılarda aidiyet duygusu ve motivasyonu artırmak için gerekli politikalar desteklenir. TUSAŞlıların gelişimi için gerekli çaba gösterilir. İş hayatı ile özel hayat arasındaki denge gözetilir. TUSAŞlıların özel hayatlarına saygılı, adil, yapıcı ve farklı fikirlerin özgürce söylendiği bir güven ortamının oluşmasına katkıda bulunulur.</p> <p>TUSAŞlıların, işyerinde veya iş sebebiyle bulundukları herhangi bir yerde, fiziksel, cinsel veya duygusal taciz yoluyla herhangi bir şekilde dokunulmazlıklarının ihlal edilmesi hukuka ve etik kurallara aykırıdır. Psikolojik bezdirme (mobbing) kapsamında değerlendirilecek şekilde hedef alınan kişiyi işten soğutmak, performansını düşürmek, istifa etmesine yol açmak amacını güden sistematik ve planlı davranışlara tolerans gösterilmez. Sindirme, gözdağı, husumet ya da saldırganlıkla dolu bir iş ortamı ortaya çıkmasına yol açan ya da haksız bir şekilde bir personelin performansını düşüren her türlü tutumdan hassasiyetle kaçınılır.</p> <p>Çalışan özlük haklarının tam ve doğru biçimde kullanılması sağlanır. TUSAŞlılar, kurumsal değerlerimiz ve etik kodlarımıza uygun olmadığını düşündükleri olayların, kurumsal çerçevede gündeme alınmasını sağlamak ile yükümlüdürler.</p> <p>TUSAŞlıların bu kapsamda incelenerek değerlendirilmesini talep ettiği etik olaylara yönelik yaptığı başvurular, kesinlikle saklı tutulur. Ayrıca çalışanlarımız aleyhine başvurularından dolayı hiçbir işlem yapılmaz ve herhangi bir baskı altına alınmaz, işlem yapanlar veya baskı uygulayanlar hakkında disiplin önlemleri alınır.</p>

Translation:

Our Moral Responsibilities

Our primary moral responsibility is to ensure the establishment of a moral working environment in all of the units of TAI. Fair and honest administrative practices to achieve a high standard in the rules of behaviour is a moral aim adopted by all the employees and managers. Direct or indirect bribery, taking and giving cuts, promising or proposing them, gaining financial or non-financial benefit are under no circumstances acceptable. For those employees who do not show their utmost care for these principles, the most severe punishment under TAI's disciplinary code is imposed.

Our Responsibilities to the People from TAI

People from TAI represent the workforce, the future and the future potential of production of TAI. To establish an environment in which people would be proud to work and enjoy working is our aim. We act swiftly and sensibly in order to solve possible problems that might arise between the employees of TAI or between the employee and management. TAI managers are responsible for treating each of the employees equally and fairly, in accordance with this Ethical Guidebook and its values and principles.

Whatever the work of the employee is, every person from TAI is to be treated in a way that makes them feel valuable, in relation to their direct or indirect contributions. Establishment of a fair human relations system, creating a flexible mechanism of communication and the adoption of a just reward and punishment system constitutes the essence of our human relations policy.

The personal rights of the employees are implemented fully and correctly. People from TAI are responsible for bringing forward incidents that are not in accordance with our values and ethical codes and for putting them on the agenda of the corporation.

In this context, the applications that request the evaluation of these events in relation to ethics are absolutely kept in secret. Also, to the employees who have application in opposition, there is no action to be taken and they are not pressured, for those who take action against these employees and pressure them, disciplinary precautions are implemented.

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 a publicly stated investigative procedure which includes a commitment to report material findings.
Evidence
<p>[6] Sorumluluklarımız / Our Responsibilities (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakkimizda/sorumluluklarimiz TUSAŞ'lara, TUSAŞ ortaklarına, Diğer Paydaşlarımıza, rakiplerimize, topluma ve insanlığa aşağıda sıralanan sorumluluklarımızı yerine getirmeye özen gösteririz.</p> <p>Yasal Sorumluluklarımız TUSAŞ bütün iş ve işlemlerinde Türkiye Cumhuriyeti Anayasası, yasaları ve tüm mevzuata uygun iş yapmayı benimser ve uygular. Ek olarak, uluslararası anlaşmalara uymayı, iş yaptığı yabancı ülkelerin sözleşmeler kapsamında üzerinde karşılıklı anlaşılmış yasal çerçevelerine uymayı da bir iş etiği ilkesi olarak benimser. Çalışma hayatında tüm faaliyet ve işlemler, yasa ve yönetmelik yükümlülükleri çerçevesinde yürütülür. Yasal düzenleyici kurum ve kuruluşlara, doğru, tam ve anlaşılabilir bilgiler zamanında sunulur.</p> <p>Faaliyet ve işlemler yürütülürken kamu kurum ve kuruluşlarına, gerçek ve tüzel kişilere, sivil toplum örgütlerine karşı herhangi bir menfaat beklentisi olmaksızın eşit mesafede durulur ve sözleşme gerekleri, ahlaki ve endüstriyel standart yükümlülükler bu sorumluluk bilinci ile yerine getirilir.</p> <p>Bu faaliyetlere ilişkin bilgi, belge ve kayıtlar düzenli ve eksiksiz olarak tutulur, muhafaza edilir.</p> <p>Translation:</p> <p>We will take care to uphold our responsibilities, which are listed below, to the people from TAI, to TAI's partners, to other shareholders, to our competitors, to the society and to humanity.</p> <p>Our Legal Responsibilities TAI in its all work and transactions embodies and implements its work according to the Turkish Republic's Constitution, to its law and legislation. Also, it abides by international laws, and adheres to the mutually agreed laws of the countries that it works with which are bound by a prior agreement on work ethic principles. In work life, all actions and transactions are conducted according to legal and regulatory responsibilities. To all institutions and organizations that regulate laws, true, complete and clear information is provided at the right time.</p> <p>While actions and transactions are being done, with public institutions and organizations, real people and legal entities, non-governmental organizations, we stand at an equal distance from all the parties without any financial expectations and all the requirements of the agreements, moral and industrial requirements are fulfilled with this sense of responsibility.</p> <p>All the records, documents and information are kept in an orderly fashion and without any deficiency, then safeguarded.</p>

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 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 company tailors its anti-bribery and corruption training to employees based on an assessment of their role and exposure to corruption risk.
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 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 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
<p>[6] Sorumluluklarımız / Our Responsibilities (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakimizda/sorumluluklarimiz</p> <p>Ahlaki Sorumluluklarımız En başta gelen ahlaki sorumluluğumuz TUSAŞ'ın bütün birimlerinde ahlaki bir çalışma ortamının oluşturulmasıdır. Adil ve dürüst işletmecilik uygulamaları, hem çalışanlar hem de yöneticiler açısından davranış kurallarında yüksek bir standardın tutturulması ahlaki bir hedef olarak benimsenir. Doğrudan veya dolaylı olarak, rüşvet, komisyon almak, vermek, taahhüt etmek veya teklif etmek, maddi veya gayri maddi herhangi bir menfaat sağlamak hiçbir şart altında kabul edilemez. Bu konularda makul özeni göstermeyen tüm çalışanlar için TUSAŞ disiplin kuralları doğrultusunda en ağır yaptırım uygulanır.</p> <p>TUSAŞlılara Karşı Sorumluluklarımız TUSAŞlılar, TUSAŞ'ın insan gücünü, geleceğini ve üretim potansiyelini temsil eder. İnsanların çalışmaktan haz ve gurur duyacağı bir iş ortamı oluşturmak hedefimizdir. TUSAŞlıların birbirleri arasında veya yönetimle oluşabilecek muhtemel sorunlarının çözümü için ivedilik ve hassasiyetle hareket edilir. TUSAŞ yöneticileri bu Etik El Kitabında yazılan değer ve ilkelere bağlı kalarak çalışanlara eşit ve adil muamele etmekle yükümlüdürler. Yaptığı iş ne olursa olsun her TUSAŞlı'nın faaliyetlerimize doğrudan ya da dolaylı bir katkısının olduğu göz önüne alınarak değerli olduğu hissettirilir. Adil bir insan kaynakları sisteminin yerleştirilmesi, esnek bir iletişim mekanizmasının oluşturulması ve hakkaniyetli bir ödül-ceza sisteminin benimsenmesi insan kaynakları politikamızın esasını oluşturur.</p> <p>TUSAŞ, çalışanlara dürüst ve adil bir yaklaşımın sağlandığı, samimi ve açık bir iletişimin yürütüldüğü, ayrımcı olmayan, güvenli ve sağlıklı bir çalışma ortamı taahhüt eder. TUSAŞ, iş güvenliği uygulamaları ile ilgili olarak yönetimin, TUSAŞlıların, tedarikçilerin ve Müşterilerin ortak çabalarının gerekli olduğunun farkındadır. TUSAŞ'ta dil, ırk, renk, cinsiyet, siyasi düşünce, inanç, din, mezhep, yaş, hamilelik, sakatlık veya malullük durumları nedeni ile ayrımcılık yapılmasına müsaade edilmez. TUSAŞlılarda aidiyet duygusu ve motivasyonu artırmak için gerekli politikalar desteklenir. TUSAŞlıların gelişimi için gerekli çaba gösterilir. İş hayatı ile özel hayat arasındaki denge gözetilir. TUSAŞlıların özel hayatlarına saygılı, adil, yapıcı ve farklı fikirlerin özgürce söylendiği bir güven ortamının oluşmasına katkıda bulunulur.</p> <p>TUSAŞlıların, işyerinde veya iş sebebiyle bulundukları herhangi bir yerde, fiziksel, cinsel veya duygusal taciz yoluyla herhangi bir şekilde dokunulmazlıklarının ihlal edilmesi hukuka ve etik kurallara aykırıdır. Psikolojik bezdirme (mobbing) kapsamında değerlendirilecek şekilde hedef alınan kişiyi işten soğutmak, performansını düşürmek, istifa etmesine yol açmak amacını güden sistematik ve planlı davranışlara tolerans gösterilmez. Sindirme, gözdağı, husumet ya da saldırganlıkla dolu bir iş ortamı ortaya çıkmasına yol açan ya da haksız bir şekilde bir personelin performansını düşüren her türlü tutumdan hassasiyetle kaçınılır.</p> <p>Çalışan özlük haklarının tam ve doğru biçimde kullanılması sağlanır. TUSAŞlılar, kurumsal değerlerimiz ve etik kodlarımıza uygun olmadığını düşündükleri olayların, kurumsal çerçevede gündeme alınmasını sağlamak ile yükümlüdürler.</p> <p>TUSAŞlıların bu kapsamda incelenerek değerlendirilmesini talep ettiği etik olaylara yönelik yaptığı başvurular, kesinlikle saklı tutulur. Ayrıca çalışanlarımız aleyhine başvurularından dolayı hiçbir işlem yapılmaz ve herhangi bir baskı altına alınmaz, işlem yapanlar veya baskı uygulayanlar hakkında disiplin önlemleri alınır.</p> <p>Translation:</p> <p>Our Moral Responsibilities</p>

Our primary moral responsibility is to ensure the establishment of a moral working environment in all of the units of TAI. Fair and honest administrative practices to achieve a high standard in the rules of behaviour is a moral aim adopted by all the employees and managers. Direct or indirect bribery, taking and giving cuts, promising or proposing them, gaining financial or non-financial benefit are under no circumstances acceptable. For those employees who do not show their utmost care for these principles, the most severe punishment under TAI's disciplinary code is imposed.

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Whatever the work of the employee is, every person from TAI is to be treated in a way that makes them feel valuable, in relation to their direct or indirect contributions. Establishment of a fair human relations system, creating a flexible mechanism of communication and the adoption of a just reward and punishment system constitutes the essence of our human relations policy.

The personal rights of the employees are implemented fully and correctly. People from TAI are responsible for bringing forward incidents that are not in accordance with our values and ethical codes and for putting them on the agenda of the corporation.

In this context, the applications that request the evaluation of these events in relation to ethics are absolutely kept in secret. Also, to the employees who have application in opposition, there is no action to be taken and they are not pressured, for those who take action against these employees and pressure them, disciplinary precautions are implemented.

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
<p>There is some evidence to suggest that the company has a policy of non-retaliation against those who report allegations or incidents of bribery or corruption. However, the company receives a score of '0' because the policy is unclear and there is no evidence that it applies to all employees company-wide and to those employed by the group as third parties, suppliers and joint venture partners.</p>
Evidence
<p>[6] Sorumluluklarımız / Our Responsibilities (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakkimizda/sorumluluklarimiz Çalışan özlük haklarının tam ve doğru biçimde kullanılması sağlanır. TUSAŞlılar, kurumsal değerlerimiz ve etik kodlarımıza uygun olmadığını düşündükleri olayların, kurumsal çerçevede gündeme alınmasını sağlamak ile yükümlüdürler.</p> <p>TUSAŞlıların bu kapsamda incelenerek değerlendirilmesini talep ettiği etik olaylara yönelik yaptığı başvurular, kesinlikle saklı tutulur. Ayrıca çalışanlarımız aleyhine başvurularından dolayı hiçbir işlem yapılmaz ve herhangi bir baskı altına alınmaz, işlem yapanlar veya baskı uygulayanlar hakkında disiplin önlemleri alınır.</p> <p>Translation:</p> <p>The personal rights of the employees are implemented fully and correctly. People from TAI are responsible for bringing forward incidents that are not in accordance with our values and ethical codes and for putting them on the agenda of the corporation.</p> <p>Applications made by the TAIs relating to ethics incidents that they request to be examined and evaluated in this context are strictly reserved. In addition, due to their application against our employees, no action is taken and they are not put under any pressure, disciplinary measures are taken against those who process or apply pressure.</p>

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
1
Comments
<p>There is evidence that the company has a whistleblowing channel.</p> <p>However, the company receives a score of '1' because there is no evidence that its channels are anonymous or confidential, or that the company has any externally operated channels. There is no evidence that the company has an advice channel. There is also no evidence that the company's whistleblowing channels are available to all employees in any country of operation, in multiple languages, and to employees of third parties, suppliers or joint venture partners.</p>
Evidence
<p>[6] Sorumluluklarımız / Our Responsibilities (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakkimizda/sorumluluklarimiz</p> <p>Çalışan özlük haklarının tam ve doğru biçimde kullanılması sağlanır. TUSAŞlılar, kurumsal değerlerimiz ve etik kodlarımıza uygun olmadığını düşündükleri olayların, kurumsal çerçevede gündeme alınmasını sağlamak ile yükümlüdürler.</p> <p>TUSAŞlıların bu kapsamda incelenerek değerlendirilmesini talep ettiği etik olaylara yönelik yaptığı başvurular, kesinlikle saklı tutulur. Ayrıca çalışanlarımız aleyhine başvurularından dolayı hiçbir işlem yapılmaz ve herhangi bir baskı altına alınmaz, işlem yapanlar veya baskı uygulayanlar hakkında disiplin önlemleri alınır.</p> <p>Translation:</p> <p>The personal rights of the employees are implemented fully and correctly. People from TAI are responsible for bringing forward incidents that are not in accordance with our values and ethical codes and for putting them on the agenda of the corporation.</p> <p>Applications made by the TAIs relating to ethics incidents that they request to be examined and evaluated in this context are strictly reserved. In addition, due to their application against our employees, no action is taken and they are not put under any pressure, disciplinary measures are taken against those who process or apply pressure.</p> <p>[9] Etik Başvuru Formu / Ethics Submission Report (Webpage) Accessed 28/04/2020 https://etik.tai.com.tr/ETIKF/</p> <p>TUSAŞ - TÜRK HAVACILIK ve UZAY SANAYİİ A.Ş. ETİK BAŞVURU FORMU</p> <p>TC Kimlik No : <input type="text"/></p> <p>Ad : <input type="text"/></p> <p>Soyad : <input type="text"/></p> <p>Doğum Tarihi : <input type="text"/></p> <p>Cep Telefonu : <input type="text"/></p> <p>E-Posta : <input type="text"/></p> <p>Etik Başvuru Konusu : <input type="text"/></p> <p>Güvenlik Kodu : <input type="text"/></p> <p>KAYDET</p>

Translation:

Ethics Submission Report

TC Identification Number:

First Name:

Surname:

Date of birth:

Mobile Phone:

Email:

Message Subject:

Security Code:

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 some evidence that the company has a policy on conflicts of interest, which covers conflicts of interest related to employee relationships, other employment and financial interests. There is evidence that the company policy includes potential or actual conflicts of interest.</p> <p>However, the company receives a score of '1' because it does not refer to conflicts of interests related to government relationships. There is also no evidence that the policy explicitly applies to all employees and board members, including those of subsidiaries and other controlled entities.</p>
Evidence
<p>[6] Sorumluluklarımız / Our Responsibilities (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakkimizda/sorumluluklarimiz Çıkar Çatışması Konusundaki Sorumluluklarımız</p> <p>TUSAŞlıların, TUSAŞ'a zarar verebilecek ve/veya 3. kişilere yarar sağlayacak şekilde şahsi çıkar gözetmeleri kabul edilemez. TUSAŞlılar çıkar çatışmasına sebep olacak durumlara dahil olmayı kesinlikle reddeder.</p> <p>TUSAŞlılar, kamu makamlarınca yapılacak görevlendirmeler hariç, TUSAŞ ile iş yapan ya da rekabet eden bir şirketin, yönetim kurulu üyesi, yöneticisi, çalışanı, dolaylı ya da dolaysız olarak sahibi, hissedarı, danışmanı olamaz.</p> <p>TUSAŞlılar, kısmi süreli danışman olarak istihdam edilenler hariç, kamu makamları veya TUSAŞ Yönetim Kurulu tarafından veya 5746 Sayılı Kanun kapsamında yapılan görevlendirmeler veya Genel Müdür onayıyla eğitim kurumlarında ders verilmesi halleri istisna olmak üzere, TUSAŞ dışında çalışamaz, bir iş yapamaz, görev kabul edemez, hiçbir zaman, TUSAŞ'ın zamanının, personelinin, ekipmanının, tesis ve bilgi altyapısının izinsiz kullanımını gerektirecek faaliyetlerde bulunamaz.</p> <p>Translation:</p> <p>Our Responsibilities Regarding Conflict of Interest</p> <p>For people from TAI, it is unacceptable to pursue actions that will harm TAI and benefit third parties to their own end. TAI people refuse to participate in situations that may lead to a conflict of interest.</p> <p>A TAI member, excluding a commission from a public authority, cannot be a member of a board of directors, manager, employee, directly or indirectly own the company, be a shareholder or advisor to the competing company or a company that TAI conducts business with.</p> <p>A TAI member, excluding those who are temporarily assigned as advisors, those who are assigned to public offices or those who are assigned by TAI's board of directors, or commissioned to a post according to legal code number 5746, or permitted by the General Director to teach in educational institutions, cannot work outside TAI, do business, accept assignment, and perform actions that would require the use of TAI time, personnel, equipment, facilities and information infrastructure without authorization.</p> <p>[4] Etik Kodlar/ Ethical Codes (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakkimizda/etik-kodlar</p>

- Kendileri ve yakınları lehine işlem yapmazlar: TUSAŞ'lı görevi kapsamında aile bireyleriyle, yakınlarıyla veya ilişkide bulunulan diğer üçüncü şahıslarla hiçbir surette karşılıklı veya karşılıksız menfaat sağlayan iş ilişkisine girmez.

Translation:

- They do not engage in transactions for their own interest or the interest of their relatives: A person from TAI shall under no circumstances start a business relationship that benefits their family members, relatives or third parties in a mutual or non-mutual relationship.

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 conflict of interest or their oversight.
Evidence
<p>[4] Etik Kodlar/ Ethical Codes (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakkimizda/etik-kodlar</p> <ul style="list-style-type: none"> Kendileri ve yakınları lehine işlem yapmazlar: TUSAŞ'lı görevi kapsamında aile bireyleriyle, yakınlarıyla veya ilişkide bulunulan diğer üçüncü şahıslarla hiçbir surette karşılıklı veya karşılıksız menfaat sağlayan iş ilişkisine girmez. <p>Translation:</p> <ul style="list-style-type: none"> They do not engage in transactions for their own interest or the interest of their relatives: A person from TAI shall under no circumstances start a business relationship that benefits their family members, relatives or third parties in a mutual or non-mutual relationship. <p>[6] Sorumluluklarımız / Our Responsibilities (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakkimizda/sorumluluklarimiz Çıkar Çatışması Konusundaki Sorumluluklarımız</p> <p>TUSAŞlıların, TUSAŞ'a zarar verebilecek ve/veya 3. kişilere yarar sağlayacak şekilde şahsi çıkar gözetmeleri kabul edilemez. TUSAŞlılar çıkar çatışmasına sebep olacak durumlara dahil olmayı kesinlikle reddeder.</p> <p>TUSAŞlılar, kamu makamlarınca yapılacak görevlendirmeler hariç, TUSAŞ ile iş yapan ya da rekabet eden bir şirketin, yönetim kurulu üyesi, yöneticisi, çalışanı, dolaylı ya da dolaysız olarak sahibi, hissedarı, danışmanı olamaz.</p> <p>TUSAŞlılar, kısmi süreli danışman olarak istihdam edilenler hariç, kamu makamları veya TUSAŞ Yönetim Kurulu tarafından veya 5746 Sayılı Kanun kapsamında yapılan görevlendirmeler veya Genel Müdür onayıyla eğitim kurumlarında ders verilmesi halleri istisna olmak üzere, TUSAŞ dışında çalışamaz, bir iş yapamaz, görev kabul edemez, hiçbir zaman, TUSAŞ'ın zamanının, personelinin, ekipmanının, tesis ve bilgi altyapısının izinsiz kullanımını gerektirecek faaliyetlerde bulunamaz.</p> <p>[...]</p> <p>Bu düzenlemelerin ihlali, gerek iş mevzuatı gerek TUSAŞ düzenlemelerinin uygulanması sonucu, işten çıkarılma nedeni olabileceği gibi cezai şikâyet ve kovuşturma nedeni de olabilir.</p> <p>Translation:</p> <p>Our Responsibilities Regarding Conflict of Interest For people from TAI, it is unacceptable to pursue actions that will harm TAI and benefit third parties to their own end. TAI people refuse to participate in situations that may lead to a conflict of interest.</p> <p>A TAI member, excluding a commission from a public authority, cannot be a member of a board of directors, manager, employee, directly or indirectly own the company, be a shareholder or advisor to the competing company or a company that TAI conducts business with.</p> <p>A TAI member, excluding those who are temporarily assigned as advisors, those who are assigned to public offices or those who are assigned by TAI's board of directors, or commissioned to a post according to legal code number</p>

5746, or permitted by General Director to teach in educational institutions, cannot work outside TAI, do business, accept assignment, and perform actions that would require the use of TAI time, personnel, equipment, facilities and information infrastructure without authorization.

[...]

The infringement of these regulations according to labour legislation or regulations of TAI can be used as a reason for dismissal and may result in criminal complaint and prosecution.

Question
4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector?
Score
0
Comments
There is no evidence that the company has a policy regulating the employment of current or former public officials.
Evidence
No evidence found.

Question
4.4. Does the company report details of the contracted services of serving politicians to the company?
Score
0
Comments
There is no evidence that the company reports details of the contracted services of serving politicians.
Evidence
No evidence found.

5. Customer Engagement

5.1 Contributions, Donations and Sponsorships

Question
5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?
Score
0
Comments
There is no clear evidence that the company has a policy on corporate political contributions. The company provides some information to indicate that it does not participate in or support political activities, however it is not clear whether this applies to individual employees or the company as a whole, and therefore it is insufficiently clear to receive a score of '1'.
Evidence
<p>[6] Sorumluluklarımız / Our Responsibilities (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakkimizda/sorumluluklarimiz TUSAŞ'lılar toplumla ve devletle olan ilişkilerinde hiçbir politik faaliyete katılım ve destek sağlamaz. Yetkili olanlar dışında hiçbir TUSAŞ'lı, herhangi bir yerde ve şekilde kamuoyuna açıklama yapamaz.</p> <p>Translation:</p> <p>TAI people do not participate in and support any political activities in their relations with society and the state. No TAI employee, other than those authorized, can make public disclosures in any place and manner.</p>

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 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
<p>There is some evidence that the company has a policy covering charitable donations and sponsorships, which includes submitting an application for approval. However, the company receives a score of '0' because there is no evidence that these policies include measures to ensure donations are not used as vehicles for bribery and corruption, for example by specifying criteria for donations, procedures for senior sign-off, or due diligence on recipients.</p>
Evidence
<p>[8] Sponsorluk / Sponsorship (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/sponsorluk Türk Havacılık ve Uzay Sanayii olarak "Havacılık ve Uzay" alanında Türkiye'yi göklere çıkaracak projeleri özenle değerlendiriyor, sponsorluk başvurusunu uygun bulmamız halinde projenin başarılı olması için gereken desteği sağlıyoruz.</p> <p>Bütün sponsorluk başvuruları bu form üzerinden online olarak yapılmaktadır. E-posta, posta ya da faks yoluyla gönderilen talepler değerlendirmeye alınmayacaktır.</p> <p>Talebinizin değerlendirmeye alınabilmesi için Sponsorluk Başvuru Formu'nda yer alan tüm bilgilerin eksiksiz doldurulması gerektiğini hatırlatır, Şirketimize gösterdiğiniz ilgi ve sponsorluk başvurunuz için teşekkür ederiz.</p> <p>Sponsorluk başvuruları için tıklayınız.</p> <p>Translation:</p> <p>As Turkish Aerospace Industries, we are carefully evaluating the projects which will allow us to take to the skies, and providing support for the fulfilment of the project if selected for sponsorship.</p> <p>All sponsorship applications are done through this form online. The applications which are submitted via e-mail, post or fax will not be evaluated.</p> <p>For the evaluation of your application, we remind you that it is necessary to fill all the information completely, and we thank you for the interest shown and the sponsorship application.</p> <p>For sponsorship applications click here.</p> <p>[6] Sorumluluklarımız / Our Responsibilities (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakkimizda/sorumluluklarimiz Sorumluluklarımız TUSAŞ'lara, TUSAŞ ortaklarına, Diğer Paydaşlarımıza, rakiplerimize, topluma ve insanlığa aşağıda sıralanan sorumluluklarımızı yerine getirmeye özen gösteririz.</p> <p>[...]</p> <p>Kamuoyu, Sivil Toplum Kuruluşları ve Medyaya Olan Sorumluluklarımız</p> <p>TUSAŞ, iş ilişkilerinin dışında toplumla iyi ilişkiler kurmayı da hedefler. Faaliyetlerine ilişkin olarak kamuoyunun bilgilendirilmesi gereken konularda gerekli iletişimi sağlar.</p>

TUSAŞ sosyal sorumluluğunu öncelikle kendi faaliyet alanı ile ilgili olan konularla sınırlar, kaynaklarını kendi misyonu ile ilgili olmayan alanlardaki sosyal sorumluluk projelerine harcamayı ekonomik sorumluluklarına aykırı bulur.

TUSAŞ yönetimi okul yaptırma, öğrencilere, hastalara, gazi-şehit ve yakınlarına yardım gibi hayır çalışmalarında personeline yardımcı olur. Milli dayanışmayı gerektiren doğal afetlerde TUSAŞ hem kendi kaynaklarından hem de TUSAŞlıların katılımı ile oluşan kaynaklardan yardım faaliyetleri organize etmeyi sosyal sorumluluğun bir parçası sayar, ancak bu gibi faaliyetleri tanıtım, reklam ve imaj geliştirme gibi ticari amaçlara dönüştürmez.

Bağış yapılan tüm kişi veya kuruluşlar kamuya duyurulur, bağışın akıbeti takip edilir. TUSAŞ, TUSAŞlılar toplumla ve devletle olan ilişkilerinde hiçbir politik faaliyete katılım ve destek sağlamaz. Yetkili olanlar dışında hiçbir TUSAŞlı, herhangi bir yerde ve şekilde kamuoyuna açıklama yapamaz.

Translation:

Our responsibilities

We take care to fulfill our responsibilities listed below for TUSAŞ, TUSAŞ partners, other stakeholders, competitors, society and humanity.

[...]

Our Responsibilities to Public Opinion, NGOs and Media

TAI aims to establish good relations with the society in addition to its business relations. It provides the necessary communication regarding the activities that the public should be informed about.

TAI limits its social responsibility primarily to issues related to its field of activity, and finds it contrary to its economic responsibilities to spend its resources on social responsibility projects in areas not related to its mission.

TAI management assists its staff in charity work such as building schools, helping students, patients, veterans-martyrs and relatives. In natural disasters that require national solidarity, TAI counts organizing relief activities from both its own resources and resources created by the participation of TAIs, but it does not turn such activities into commercial purposes such as promotion, advertisement and image development.

All people or organizations donated are announced to the public and the fate of the donation is followed. TAI, TAI employees do not participate in and support any political activities in their relations with society and the state. No TAI employees, other than those authorized, can make public disclosures in any place and manner.

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
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 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
1
Comments
<p>There is some evidence that the company has a policy covering gifts and hospitality, which includes some financial limits on gifts employees may accept.</p> <p>However, the company does not clarify whether this extends to the giving of gifts and hospitality. Additionally, the policy does not address the risks associated with gifts and hospitality given to/received from domestic or foreign public officials. Additionally, there is no evidence that all gifts and hospitality above a certain threshold are recorded in a dedicated register or central depository that is accessible to those responsible for oversight of the process.</p>
Evidence
<p>[6] Sorumluluklarımız / Our Responsibilities (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakimizda/sorumluluklarimiz</p> <p>TUSAŞ'ın tarafsızlığını, performansını, kararını veya görevini yapmasını etkileyen veya etkileme ihtimali bulunan, ekonomik değeri olan ya da olmayan, doğrudan ya da dolaylı olarak kabul edilen her türlü eşya ve menfaat hediye kapsamındadır. TUSAŞlılar ve yakın aile bireyleri Diğer Paydaşlardan hediye talep edemez, hediye talep ettiği imasında bulunamaz. Hediye verilmemesi hususu ziyarete geleceklere nezaket çerçevesinde hatırlatılır.</p> <p>Aşağıda belirtilenler hediye alma yasağı kapsamı dışındadır:</p> <ul style="list-style-type: none"> • Nezaket gereği reddedilemeyecek makamlarca sunulacak değeri 100 (Yüz) Amerikan Dolarını aşmayan hediyeler, (Bunlar kalıcı-demirbaş nitelikte ise TUSAŞ envanterine kaydedilerek şeref salonu veya genel müdürlük binası giriş salonunda sergilenir, tüketim malzemesi ise TUSAŞ çalışanlarına dağıtılır.) • Kitap, dergi, makale, kaset, takvim, cd veya buna benzer nitelikte olanlar, • Halka açık yarışmalarda, kampanyalarda veya etkinliklerde kazanılan ödül veya hediyeler, • Herkese açık konferans, sempozyum, forum, panel, yemek, resepsiyon veya buna benzer etkinliklerde verilen hatıra niteliğindeki hediyeler, • Tanıtım amacına yönelik, herkese dağıtılan ve sembolik değeri bulunan reklam ve el sanatları ürünleri. <p>Aşağıda belirtilenler, sayılanlarla sınırlı olmamak üzere, hediye alma yasağı kapsamındadır:</p> <ul style="list-style-type: none"> • Diğer Paydaşlardan alınan burs, seyahat, ücretsiz konaklama ve hediye çekleri, • Taşınır veya taşınmaz mal veya hizmet satın alırken, satarken veya kiralarken piyasa fiyatına göre makul olmayan bedeller üzerinden yapılan işlemler, • Diğer Paydaşlardan alınan borçlar. <p>Bu düzenlemelerin ihlali, gerek iş mevzuatı gerek TUSAŞ düzenlemelerinin uygulanması sonucu, işten çıkarılma nedeni olabileceği gibi cezai şikâyet ve kovuşturma nedeni de olabilir.</p> <p>Translation:</p> <p>Every item and benefit, which may or may not have an economic value accepted directly or indirectly, that affects and may affect the people from TAI's impartiality, performance, judgement or their duties is considered a gift. TAI members and their family members cannot request gifts or imply that they want gifts from other shareholders. The matter of not accepting gifts is always politely reminded to those who visit the company.</p> <p>Those indicated below are the exceptions to the rule of not receiving gifts:</p> <ul style="list-style-type: none"> • The gifts which are given from persons who cannot be rejected because of politeness, and whose value do not exceed 100 (Hundred) American Dollars (If those gifts are permanent and office-stock items they are

recorded in the inventory and exhibited in VIP lounge or in the entrance salon of the General Directory building, if they are consumable then it is distributed to the TAI employees.)

- Books, magazines, articles, cassettes, calendars, CD's and other items which are similar in quality,
- Prizes and gifts which are won in competitions, special offers or events which are open to the public,
- Souvenirs from conferences, symposiums, forums, panel discussions, dinners, receptions and other similar events which are open to the public,
- Items and handicraft items which are promotional, which are distributed to everyone and have a symbolic value.

Those are listed, but not limited to the list are within the rule of not receiving gifts:

- Scholarships, travel tickets, free accommodation and gift vouchers which are taken from other shareholders,
- Conducted transactions which are not in accordance with the market value when buying, selling or renting a property or other movable property,
- Loans taken from other shareholders.

The infringement of these regulations according to labour legislation or regulations of TAI can be used as a reason for dismissal and may result in criminal complaint and prosecution.

6. Supply Chain Management

Question
6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?
Score
1
Comments
<p>There is some evidence that the company's procurement department is involved, in some capacity, in the establishment and oversight of supplier relationships.</p> <p>However, the company receives a score of '1' as there is no evidence that the involvement of the procurement department is required for establishing any new suppliers over a certain threshold or that it is the main body responsible for oversight of the company's supplier base. There is also no clear evidence that the company assures itself of the procurement department's involvement at least every three years.</p>
Evidence
<p>[2] Approved Supplier List (Webpage) Accessed 20/09/2019 https://www.tusas.com.tr/en/supply-chain/supplier-quality/approved-supplier-list Turkish Aerospace works with more than 1000, small, medium and large sized companies, add these companies to the Approved Supplier List according to categories, job definitions, Quality Management System Certificates and based on Quality Management System Audit results if necessary.</p> <p>Furthermore, performance of the companies in Approved Supplier List are periodically reviewed by Quality Management Systems Audits for reliable continuity of the Approved Supplier List.</p> <p>[10] Tedarik / Supply (Webpage) Accessed 29/04/2020 https://www.tusas.com/tedarik/tedarik Tedarik TUSAŞ ihtiyacı için yurt içi ve yurt dışı kaynaklardan yapılacak tüm malzeme, ekipman ve hizmet alımları ile bunlara bağlı ithalat, ihracat ve gümrükleme işlemleri Tedarik kapsamıdır.</p> <p>TUSAŞ'ın temel tedarik politikası, teknik nedenlerle belirli bir kaynaktan tedarik edilmek zorunda olan malzeme ve hizmetler hariç olmak üzere, ihtiyaçların birden fazla kaynağa gidilerek rekabet ortamında, maliyet etkin, uygun kalitede ve ihtiyaç duyulan tarihlerde karşılanmasıdır.</p> <p>Tedarik Portalı 'ne ulaşmak için lütfen tıklayınız.</p> <p>İhale Duyuruları 'na ulaşmak için lütfen tıklayınız.</p> <p>Translation:</p> <p>Supply For the needs of TAI, all material, equipment and service purchases to be made from domestic and foreign sources, as well as import, export and customs clearance operations are the scope of supply.</p> <p>TAI's basic supply policy is to meet the needs of multiple sources, except for materials and services that must be procured from a particular source, in a competitive environment, cost-effective, appropriate quality and on dates when needed.</p> <p>Please click to reach the Supply Portal.</p> <p>Please click to reach the Tender Announcements.</p>

[11] Tedarikçi Kalite / Supplier Quality (Webpage)

Accessed 29/04/2020

<https://www.tusas.com/tedarik/tedarikci-kalite>**Tedarikçi Kalite**

"Özgün ürünlere sahip ve küresel rekabet gücüne ulaşmış, Dünya markası havacılık ve uzay şirketi olmak" vizyonu ve "sürekli iyileştirme yaklaşımıyla müşteri memnuniyeti sağlamak" kalite politikası ile yola çıkan TUSAŞ, hızla büyüyen küresel pazarda, öncü kuruluşlardan olmak için, tedarik zincirini güçlendirme ve sürekli iyileştirme hedefindedir.

IAQG (International Aerospace Quality Group) üyeliği ile birlikte TUSAŞ, sadece kural uygulayıcı değil, ayrıca, Dünya'nın sayılı büyük havacılık firmaları ile birlikte kural koyucu konumuna da gelmiştir.

Yerli ve Yabancı Tedarikçilerimiz, TUSAŞ bünyesinde üretilmekte olan İnsansız Hava Aracı, Askeri ve Sivil Uçak, Uzay, Helikopter projeleri için son ürüne etki eden parça alımı yapılan tüm firmaları kapsamaktadır.

TUSAŞ'ın halihazırda 1000'in üzerinde onaylı yerli ve yabancı tedarikçisi bulunmakta olup, TUSAŞ bu tedarikçilerinin desteği ile de büyüyerek küresel anlamda güçlü bir firma olmayı hedeflemektedir.

Buradaki amaç, otorite, regülasyonlar, standartlardan doğan istekleri, müşteri gereksinimlerini tek bir yerden tüm tedarikçilerimize hızlı ve etkin bir şekilde aktarabilmek ve tedarikçilerimizle kalite verilerini interaktif olarak paylaşabilmek için bir arayüz sağlamaktır.

Translation:**Supplier Quality**

Setting out with the vision of "having original products and reaching global competitiveness, becoming a world brand aviation and space company" and "ensuring customer satisfaction with the approach of continuous improvement", TAI strengthened its supply chain and continued to be one of the leading companies in the rapidly growing global market aimed at improvement.

With the membership of IAQG (International Aerospace Quality Group), TAI became not only a rule enforcer, but also a rule maker with the world's major aviation companies.

Our domestic and foreign suppliers include all companies that purchase parts affecting the final product for the Unmanned Aerial Vehicle, Military and Civil Aircraft, Space and Helicopter projects produced within TAI.

TAI currently has over 1000 approved domestic and foreign suppliers, and TAI aims to grow globally with the support of these suppliers and become a strong company.

The aim here is to provide an interface for transferring authority, regulations, standards, customer requirements to all of our suppliers quickly and effectively from one place and to share quality data with our suppliers interactively.

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
The company simply states that it conducts due diligence on its suppliers, without providing any further details.
Evidence
<p>[2] Approved Supplier List (Webpage) Accessed 20/09/2019 https://www.tusas.com.tr/en/supply-chain/supplier-quality/approved-supplier-list Turkish Aerospace works with more than 1000, small, medium and large sized companies, add these companies to the Approved Supplier List according to categories, job definitions, Quality Management System Certificates and based on Quality Management System Audit results if necessary.</p> <p>Furthermore, performance of the companies in Approved Supplier List are periodically reviewed by Quality Management Systems Audits for reliable continuity of the Approved Supplier List.</p> <p>[6] Sorumluluklarımız / Our Responsibilities (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakkimizda/sorumluluklarimiz Tedarikçilerimize Karşı Sorumluluklarımız</p> <p>TUSAŞ, Tedarikçilerini zor durumda bırakacak ya da sömürülmeleri anlamına gelecek ticari uygulamalardan kaçınır. Tedarikçilerinin daha kaliteli ürünler üretebilmesini temin için onlara teknik ve eğitim desteği sunmayı sosyal sorumluluğunun bir gereği sayar. Tedarikçilerinden de kendisi için üretim yaparken iş etiğine uygun davranmalarını bekler. Tedarikçi ve iş ortakları ile ilişkilerde adil ve saygılı davranılır, yükümlülükleri zamanında yerine getirmek için gerekli özen gösterilir. İş yapılan kişi ve kuruluşlar ile TUSAŞ'ın iş ortaklarının gizlilik dereceli ve hassas bilgileri özenle korunur.</p> <p>Translation:</p> <p>Our Responsibilities Towards Our Suppliers</p> <p>TAI avoids commercial practices that would put its Suppliers in a difficult situation or that would be exploited. It considers it a requirement of its social responsibility to provide technical and training support to its suppliers to produce higher quality products. It expects its suppliers to act in accordance with the business ethics while producing for itself. In dealing with suppliers and business partners, fair and respectful behavior is handled and due diligence is shown to fulfill the obligations on time. Confidentiality and sensitive information of the individuals and organizations and business partners of TUSAŞ are carefully protected.</p>

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
The company states that its suppliers must meet a certain standard of ethical business conduct, but does not specifically refer to any of the anti-bribery and corruption measures necessary to receive a score of '1'.
Evidence
<p>[6] Sorumluluklarımız / Our Responsibilities (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakkimizda/sorumluluklarimiz Tedarikçilerimize Karşı Sorumluluklarımız TUSAŞ, Tedarikçilerini zor durumda bırakacak ya da sömürülmeleri anlamına gelecek ticari uygulamalardan kaçınır. Tedarikçilerinin daha kaliteli ürünler üretebilmesini temin için onlara teknik ve eğitim desteği sunmayı sosyal sorumluluğunun bir gereği sayar. Tedarikçilerinden de kendisi için üretim yaparken iş etiğine uygun davranmalarını bekler. Tedarikçi ve iş ortakları ile ilişkilerde adil ve saygılı davranılır, yükümlülükleri zamanında yerine getirmek için gerekli özen gösterilir. İş yapılan kişi ve kuruluşlar ile TUSAŞ'ın iş ortaklarının gizlilik dereceli ve hassas bilgileri özenle korunur.</p> <p>Translation:</p> <p>Responsibilities to Our Suppliers TAI avoids commercial practices that will harm its suppliers or exploit them. It considers providing technical and educational support to ensure that its suppliers produce better quality products as its social responsibility. And from its suppliers, it expects that they will act according to the company's ethics. The suppliers and partners are treated fairly and respectably in all relations, and the company takes care to fulfil all of its responsibilities in time. The information on people and organizations who conduct business with TAI and its business partners' classified information are carefully kept in secret.</p>

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

Question
6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or anti-bribery and corruption investigations 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 evidence that the company has a policy covering 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 states that it conducts anti-bribery and corruption due diligence on its agents or intermediaries.
Evidence
No evidence found.

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

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

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

7.2 Joint Ventures

Question
7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures?
Score
0
Comments
There is no 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.
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 has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence on its offset obligations.
Evidence
No evidence found.


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

9. High Risk Markets

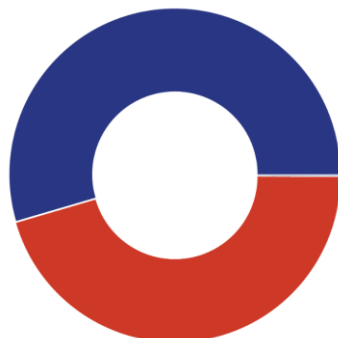
Question
9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?
Score
0
Comments
There is no evidence that the company acknowledges the corruption risks of operating in different markets, or that risk assessment procedures are used to inform the company's operations in high risk markets.
Evidence
<p>[6] Sorumluluklarımız / Our Responsibilities (Webpage) Accessed 27/09/2019 https://www.tusas.com.tr/kurumsal/hakkimizda/sorumluluklarimiz TUSAŞ'lara, TUSAŞ ortaklarına, Diğer Paydaşlarımıza, rakiplerimize, topluma ve insanlığa aşağıda sıralanan sorumluluklarımızı yerine getirmeye özen gösteririz.</p> <p>Yasal Sorumluluklarımız TUSAŞ bütün iş ve işlemlerinde Türkiye Cumhuriyeti Anayasası, yasaları ve tüm mevzuata uygun iş yapmayı benimser ve uygular. Ek olarak, uluslararası anlaşmalara uymayı, iş yaptığı yabancı ülkelerin sözleşmeler kapsamında üzerinde karşılıklı anlaşılmış yasal çerçevelerine uymayı da bir iş etiği ilkesi olarak benimser. Çalışma hayatında tüm faaliyet ve işlemler, yasa ve yönetmelik yükümlülükleri çerçevesinde yürütülür. Yasal düzenleyici kurum ve kuruluşlara, doğru, tam ve anlaşılabilir bilgiler zamanında sunulur.</p> <p>Translation:</p> <p>We will take care to uphold our responsibilities, which are listed below, to the people from TAI, to TAI's partners, to other shareholders, to our competitors, to the society and to humanity.</p> <p>Our Legal Responsibilities TAI in its all work and transactions embodies and implements its work according to the Turkish Republic's Constitution, to its law and legislation. Also, it abides by international laws, and adheres to the mutually agreed laws of the countries that it works with which are bound by a prior agreement on work ethic principles. In work life, all actions and transactions are conducted according to legal and regulatory responsibilities. To all institutions and organizations that regulate laws, true, complete and clear information is provided at the right time.</p>

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																																																												
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Comments																																																												
<p>The company publishes a list of its subsidiaries and holdings, alongside its percentage ownership. Evidence indicates that the data represents all of the company's holdings.</p> <p>However, the company receives a score of '1' because it is unclear that the company's data is updated at least annually. The company's data is also not accompanied by a statement that it is complete at the time of publication to the best of the company's knowledge. There is also no evidence that the list includes the countries of incorporation and operation for each entity.</p>																																																												
Evidence																																																												
<p>[1] About Us (Webpage) Accessed 20/09/2019 https://www.tusas.com.tr/en/corporate/about-us</p> <p>SUBSIDIARIES</p> <table><tr><td></td><td>50,5%</td><td>TR MEKATRONİK</td><td>50%</td><td>TR Airworthiness Services Inc.</td><td>100%</td></tr><tr><td></td><td>50%</td><td>TR-M TR MOTOR GÜÇ SİSTEMLERİ</td><td>35%</td><td>TeknoHAB Technology Development Zone Inc.</td><td>30%</td></tr><tr><td></td><td>5,6%</td><td>TRD Microelectronic Industries</td><td>40%</td><td></td><td>25%</td></tr><tr><td></td><td>100%</td><td></td><td>49%</td><td>TR Education and Technology Inc.</td><td>100%</td></tr><tr><td></td><td>100%</td><td></td><td></td><td></td><td>100%</td></tr><tr><td>TR-M TR MOTOR GÜÇ SİSTEMLERİ</td><td>35%</td><td></td><td>100%</td><td></td><td></td></tr><tr><td></td><td>50%</td><td>TRD Microelectronic Inc.</td><td>40%</td><td></td><td></td></tr><tr><td></td><td>49%</td><td>TUSAŞ Foreign Trade Inc.</td><td>100%</td><td></td><td></td></tr><tr><td></td><td>50%</td><td>TASECS Air Conditioning Inc.</td><td>20%</td><td></td><td></td></tr><tr><td>TR Education and Technology Inc.</td><td>50%</td><td>TeknoHAB Technology Development Zone Management Inc.</td><td>15%</td><td></td><td></td></tr></table>		50,5%	TR MEKATRONİK	50%	TR Airworthiness Services Inc.	100%		50%	TR-M TR MOTOR GÜÇ SİSTEMLERİ	35%	TeknoHAB Technology Development Zone Inc.	30%		5,6%	TRD Microelectronic Industries	40%		25%		100%		49%	TR Education and Technology Inc.	100%		100%				100%	TR-M TR MOTOR GÜÇ SİSTEMLERİ	35%		100%				50%	TRD Microelectronic Inc.	40%				49%	TUSAŞ Foreign Trade Inc.	100%				50%	TASECS Air Conditioning Inc.	20%			TR Education and Technology Inc.	50%	TeknoHAB Technology Development Zone Management Inc.	15%		
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Question						
9.3 Does the company disclose its beneficial ownership and control structure?						
Score						
1						
Comments						
<p>The company discloses all beneficial owners with an ownership interest in the company. All entities are referred to by name, along with their percentage ownership in the company. The company's ownership information indicates that the Turkish government holds 45.45% of shares through the Undersecretariat for Defence Industries, making the company partially state-owned.</p> <p>However, the company receives a score of '1' because this information is published only on the company's website and not in a freely accessible public register.</p>						
Evidence						
<p>[1] About Us (Webpage) Accessed 20/09/2019 https://www.tusas.com.tr/en/corporate/about-us</p> <p>SHAREHOLDERS</p>  <table><tr><td>■</td><td>54,49% <i>Turkish Armed Forces Foundation</i></td></tr><tr><td>■</td><td>45,45% <i>Undersecretariat for Defence Industries</i></td></tr><tr><td>■</td><td>0,06% <i>Turkish Aeronautical Association</i></td></tr></table>	■	54,49% <i>Turkish Armed Forces Foundation</i>	■	45,45% <i>Undersecretariat for Defence Industries</i>	■	0,06% <i>Turkish Aeronautical Association</i>
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■	45,45% <i>Undersecretariat for Defence Industries</i>					
■	0,06% <i>Turkish Aeronautical Association</i>					

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 defence sales by customer.
Evidence
No evidence found.

10. State-Owned Enterprises (SOEs)

Question						
10.1 Does the SOE publish a breakdown of its shareholder voting rights?						
Score						
0						
Comments						
There is no evidence that the SOE publishes details of its shareholder voting rights. The company publishes information on its major shareholders, but does not provide any accompanying details of the voting rights for each entity.						
Evidence						
<p>[1] About Us (Webpage) Accessed 20/09/2019 https://www.tusas.com.tr/en/corporate/about-us</p> <p>SHAREHOLDERS</p>  <table><tr><td>■</td><td>54,49% Turkish Armed Forces Foundation</td></tr><tr><td>■</td><td>45,45% Undersecretariat for Defence Industries</td></tr><tr><td>■</td><td>0,06% Turkish Aeronautical Association</td></tr></table>	■	54,49% Turkish Armed Forces Foundation	■	45,45% Undersecretariat for Defence Industries	■	0,06% Turkish Aeronautical Association
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■	45,45% Undersecretariat for Defence Industries					
■	0,06% Turkish Aeronautical Association					

Question
10.2 Are the SOE's commercial and public policy objectives publicly available?
Score
1
Comments
<p>The company publishes its commercial and public policy objectives on its website. The company indicates that its primary objectives are to meet the country's national security requirements, serve the Turkish Air Force and become a leader in the aerospace industry.</p> <p>However, the company receives a score of '1' because there is no evidence that these objectives are updated on at least an annual basis or whenever there is a change in objectives.</p>
Evidence
<p>[1] About Us (Webpage) Accessed 20/09/2019 https://www.tusas.com.tr/en/corporate/about-us</p> <p>Turkish Aircraft Industries Corporation was established on June 28, 1973 under the auspices of the Ministry of Industry and Technology in order to reduce the foreign dependency in defense industry of Turkey.</p> <p>With the decision of meeting the combat aircraft requirement of Turkish Air Force (TurAF) with F-16s, Turkish Aerospace Industries, Inc. (TAI) was established by Turkish and US partners in 1984 for a period of 25 years with the aim to realize the manufacture, systems integration and flight tests of F-16 that would be delivered to TurAF. TAI was restructured in the year 2005, just before the 25 years of period came to an end, with the acquisition of foreign shares by Turkish shareholders. Along with this restructuring, Turkish Aircraft Industries and TAI have merged under the roof of Turkish Aerospace Industries, Inc. and have broadened its activities.</p> <p>In 2018, Turkish Aerospace got a fresh look with its new logo and identity.</p> <p>Turkish Aerospace has become Turkey's center of technology in design, development, modernization, manufacturing, integration and life cycle support of integrated aerospace systems, from fixed and rotary wing air platforms to UAVs and satellites.</p> <p>Turkish Aerospace, which ranks among the top hundred global players in aerospace and defence arena, based its business on five strategic pillars as shown below;</p> <ul style="list-style-type: none"> • Aerostructures Group, • Aircraft Group, • Helicopter Group, • UAS Group, • Space Systems Group <p>In addition, integrated logistics service is also provided for all products designed and produced by Turkish Aerospace.</p> <div> <div> <p>OUR VISION</p> <p>Becoming a "World Brand Aerospace Company" with indigenous products and global competitive power.</p> </div> <div> <p>OUR MISSION</p> <p>Providing solutions for national security requirements in the aerospace sector and leading the development of industry.</p> </div> <div> <p>VALUES</p> <ul style="list-style-type: none"> • Honesty and Integrity, • Innovation • Efficiency/Effectiveness • Shareholder Satisfaction </div> </div>

[7] Vizyonumuz / Our Vision (Webpage)

Accessed 27/09/2019

<https://www.tusas.com.tr/kurumsal/vizyonumuz>

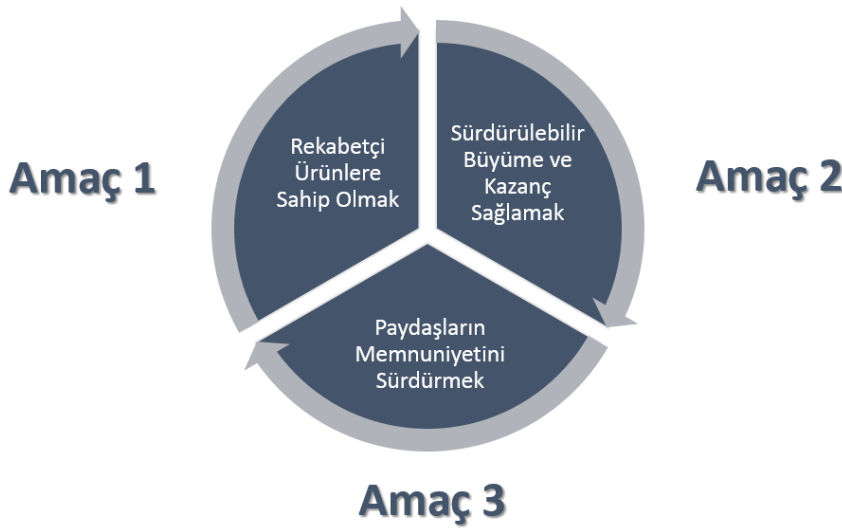
Vizyonumuz

HEDEFİMİZ : 10 YILDA 10 MİLYAR \$ CİRO

Türk Havacılık ve Uzay Sanayii, 2005 yılında gerçekleştirilmiş olan millileşme hareketi sonrası ilk hızlı büyüme dönemini yaşamış ve Türkiye'nin lider havacılık ve uzay merkezi olarak uluslararası alanda kendini göstermeye başlamıştır.

İç ve dış paydaşlarının memnuniyetlerini göz önünde bulunduran Türk Havacılık ve Uzay Sanayii, ülkemize ve dost ülkelere savunma ve havacılık alanında birçok ürünler sunan aynı zamanda her geçen gün teknolojik yönünü ve mühendislik alt yapısını güçlendiren bir şirket olarak hedeflerine ilerlemektedir. Uluslararası alanda havacılık ve uzay şirketleri arasında 2017 yılında 61. sırada yer alan şirketimiz, 2027 yılında 10 Milyar \$ ciroya ulaşacak şekilde stratejilerini oluşturmaktadır.

Vizyon ve misyonumuza ulaşabilmek için yol haritamız aşağıda verilen üç ana eksen etrafında şekillendirilmiştir. Bu eksenler; küresel firma olma yolunda ürün geliştirme, sürdürülebilirlik için gelir, kar, taahhüte bağlanmış iş hacminin sağlanması ve kurumsal süreçlerin yönetimi ile paydaşların beklentilerinin karşılanması olarak belirlenmiştir.

**Translation:**

Our Vision

OUR GOAL: \$10 BILLION TURNOVER IN 10 YEARS

After its nationalization in 2005, Turkish Aerospace Industries experienced its first fast surge in growth and started to demonstrate itself as the leading Turkish aviation and space centre in the international scene.

Turkish Aerospace Industries, which takes the satisfaction of its national and international shareholders into consideration, which provides products especially in the fields of defence and aviation to our country and other

friendly countries with strengthening itself on technological and engineering aspects, moves closer to realize its goals as a company. Our company which was in 61st place in 2017 amongst other aviation and space companies on the international scene, forms its strategies to reach \$10 Billion turnover by the year 2027.

Our road map to realize our goals which are given below is constituted of three main axes. These axes are determined as: developing products to become a global firm, increasing income for sustainability and profit, providing the promised volume of business and fulfilment of the shareholders' expectations through the administration of corporate processes.

Goal 1: Having competitive products

Goal 2: Having sustainable growth and creating profit

Goal 3: Ensuring the continuation of shareholders satisfaction

Goal 1: Product development, Technology development

Goal 2: Volume of Business/Profit, Profitability, Strategical Development Areas, Improving the Supply Chain, Enhancing the Corporate Structure, Participation Administration

Goal 3: Customer Satisfaction, Shareholder Satisfaction, Development of the Employee, Supply Chain Communications, Social and Environmental Responsibilities.

[6] Sorumluluklarımız / Our Responsibilities (Webpage)

Accessed 27/09/2019

<https://www.tusas.com.tr/kurumsal/hakkimizda/sorumluluklarimiz>

Ekonomik Sorumluluklarımız

En önemli ekonomik sorumluluğumuz sürdürülebilir bir kârlılık, verimlilik ve büyüme içinde ülke ekonomisine katkıda bulunmaktır. Ürettiğimiz ürünlerde ulusal katma değer oranını artırmakla milli gelirimize ve ticaret dengemize pozitif bir katkıda bulunmuş oluruz. Verimli ve kârlı olarak ülke ekonomisine ek istihdam da yaratmış oluruz. Bu durum gerek TUSAŞ adına, gerek çalışanlar adına ödenen vergiler yoluyla devlet bütçesine de katkı anlamına gelmektedir.

Yerli tedarikçilerimizden sağladığımız mal ve hizmetler ise çarpan mekanizması etkisi ile ek istihdam ve gelir yaratmaktadır. Ayrıca bir Ankara firması olarak TUSAŞ, Ankara ekonomisinin gelişmesinde özel bir sorumluluğu olduğunun da farkındadır ve bölgesel istihdam ve yardımcı sanayiinin gelişmesi için elinden gelen gayreti bir sosyal sorumluluk bilinciyle gösterir.

Translation:

Our Economic Responsibilities

Our most important economic responsibility is to contribute to the country's economy in a sustainable profitability, efficiency and growth. By increasing the national value added rate in the products we produce, we will contribute positively to our national income and trade balance. We create additional employment for the national economy efficiently and profitably. This situation also contributes to the state budget through taxes paid on behalf of TUSAŞ and employees.

The goods and services we provide from our local suppliers create additional employment and income due to the multiplier mechanism. In addition, as an Ankara company, TUSAŞ is aware that it has a special responsibility in the development of the Ankara economy and shows its social responsibility with the awareness of its efforts for the development of the regional employment and auxiliary industry.

Question

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

Score

0

Comments

There is evidence that the company publishes some information on the composition of its board, including the names and positions of each board member. However, the company receives a score of '0' because it does not provide any further information on the nomination and appointment process, nor does it indicate whether each board member is independent, non-executive or a state representative.

Evidence**[3] Management (Webpage)**

Accessed 20/09/2019

<https://www.tusas.com/en/corporate/management>

Management

Prof. Oğuz BORAT

Chairman of the Board



Prof. Ahmet BOLAT

Deputy Chairman



**Yunus Emre
KARAOSMANOĞLU**

Member of the Board of Directors



Burhanettin AKTI

Member of the Board of Directors



H. Cihangir KADAKAL

Member of the Board of Directors



Prof. Ünver KAYNAK

Member of the Board of Directors



Adnan ÇELİK

Member of the Board of Directors



Prof. Temel KOTİL

President & CEO



Question
10.4 Is the SOE's audit committee composed of a majority of independent directors?
Score
0
Comments
There is no evidence to indicate 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
There is no evidence that the company publishes any details about its management of asset transactions.
Evidence
No evidence found.

List of Evidence & Sources

No	Type (Webpage or Document)	Name	Download Date	Link
01	Webpage	About Us	20/09/2019	https://www.tusas.com.tr/en/corporate/about-us
02	Webpage	Approved Supplier List	20/09/2019	https://www.tusas.com.tr/en/supply-chain/supplier-quality/approved-supplier-list
03	Webpage	Management	20/09/2019	https://www.tusas.com/en/corporate/management
04	Webpage	Etik Kodlar / Ethical Codes	27/09/2019	https://www.tusas.com.tr/kurumsal/hakkimizda/etik-kodlar
05	Webpage	Etik Yönetimi / Ethics Management	27/09/2019	https://www.tusas.com.tr/kurumsal/hakkimizda/etik-yonetimi
06	Webpage	Sorumluluklarımız / Our Responsibilities	27/09/2019	https://www.tusas.com.tr/kurumsal/hakkimizda/sorumluluklarimiz
07	Webpage	Vizyonumuz / Our Vision	27/09/2019	https://www.tusas.com.tr/kurumsal/vizyonumuz
08	Webpage	Sponsorluk / Sponsorship	27/09/2019	https://www.tusas.com.tr/kurumsal/sponsorluk
09	Webpage	Etik Basvuru Formu / Ethics Submission Report	28/04/2020	https://etik.tai.com.tr/ETIKF/
10	Webpage	Supply	29/04/2020	https://www.tusas.com/tedarik/tedarik