

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

FINAL ASSESSMENT

ROKETSAN A.S.

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

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

Section	Number of Questions*	Score Based on Publicly Available Information
1. Leadership and Organisational Culture	4	0/8
2. Internal Controls	6	0/12
3. Support to Employees	7	0/14
4. Conflict of Interest	4	1/8
5. Customer Engagement	7	0/14
6. Supply Chain Management	5	0/10
7. Agents, Intermediaries and Joint Ventures	10	0/20
8. Offsets	4	0/8
9. High Risk Markets	4	1/8
10. State-Owned Enterprises	5	1/10
TOTAL		3/112
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 has a publicly stated commitment to 'integrity' and 'high ethical standards' but does not explicitly mention anti-bribery and corruption. There is no evidence that this commitment is endorsed by senior leadership.
Evidence
<p>[1] Roketsan - Business Life (Webpage) Accessed 16/09/2019 http://www.roketsan.com.tr/en/kurumsal/etik-ilkelerimiz/</p> <p>Taking on Responsibility at the Highest Level and Displaying Exemplary Behavior Roketsan members take over responsibilities at the highest level in connection with their duty and do whatever is required for it. Willing participation is expected from the members of Roketsan in creating a rational, well planned, efficient, participating, harmonious and comfortable work environment and sustaining such an environment.</p> <p>On the other hand, managers at every level inform their personnel about the work principles, policies and practices which, altogether, comprise the corporate culture, serve as a model from them their behavior and always support them. In this context, to have the teamwork culture well adopted by the personnel is a very important duty to be carried out by the managers.</p> <p>Adhering to the Corporate Values The biggest asset of the company is Roketsan itself as an entity. Roketsan members adopt, practice and continuously improve corporate values and routines set by regulations, manuals, procedures, instructions and other practices of the company.</p> <p>Using the Corporate Resources Efficiency Roketsan has a number of important resources, including physical assets (facilities, materials), financial sources, trade secrets, patents, registered trademarks, specialized knowledge and intellectual property rights. Roketsan members use, protect, improve and increase all such equities properly and efficiently. Roketsan members aim at having the products they produce using the company's resources, serve the interests and the well-being of the country.</p> <p>Protecting Equality within the Company Principle of equality is essential in intra-corporate procedures and relations. Roketsan members are expected to pay regard to equality in the company, always avoid discrimination and be fair, thus to strengthen the senses of belonging and confidence.</p> <p>Avoiding Interest Conflicts Roketsan members adopt the principle of avoiding conflicts of interest and do not use the name of Roketsan for the purpose of obtaining personal benefits.</p> <p>Roketsan members do not establish relations with suppliers and subcontractors which clash with the interests of the company or which may adversely affect their decisions and practices, do not act in a manner to create opportunities, either for themselves or for their relatives in connection with the company's business and do not use corporate sources for their private needs.</p> <p>[2] Roketsan – Code (Webpage) Accessed 16/09/2019 http://www.roketsan.com.tr/en/kurumsal/etik-ilkelerimiz/</p> <p>Taking on Responsibility at the Highest Level and Displaying Exemplary Behavior</p>

Roketsan members take over responsibilities at the highest level in connection with their duty and do whatever is required for it. Willing participation is expected from the members of Roketsan in creating a rational, well planned, efficient, participating, harmonious and comfortable work environment and sustaining such an environment.

On the other hand, managers at every level inform their personnel about the work principles, policies and practices which, altogether, comprise the corporate culture, serve as a model for them their behavior and always support them. In this context, to have the teamwork culture well adopted by the personnel is a very important duty to be carried out by the managers.

Adhering to the Corporate Values

The biggest asset of the company is Roketsan itself as an entity. Roketsan members adopt, practice and continuously improve corporate values and routines set by regulations, manuals, procedures, instructions and other practices of the company.

Using the Corporate Resources Efficiency

Roketsan has a number of important resources, including physical assets (facilities, materials), financial sources, trade secrets, patents, registered trademarks, specialized knowledge and intellectual property rights. Roketsan members use, protect, improve and increase all such equities properly and efficiently. Roketsan members aim at having the products they produce using the company's resources, serve the interests and the well-being of the country.

Protecting Equality within the Company

Principle of equality is essential in intra-corporate procedures and relations. Roketsan members are expected to pay regard to equality in the company, always avoid discrimination and be fair, thus to strengthen the senses of belonging and confidence.

Avoiding Interest Conflicts

Roketsan members adopt the principle of avoiding conflicts of interest and do not use the name of Roketsan for the purpose of obtaining personal benefits.

Roketsan members do not establish relations with suppliers and subcontractors which clash with the interests of the company or which may adversely affect their decisions and practices, do not act in a manner to create opportunities, either for themselves or for their relatives in connection with the company's business and do not use corporate sources for their private needs.

[3] Roketsan - Our Policy and Core Values (Website)

Accessed 16/09/2019

<http://www.roketsan.com.tr/en/kurumsal/politikamiz-ve-oz-degerlerimiz/>

Policy

Within the context of the National Rocket and Missile Industry Policies, Roketsan is committed to the design, manufacture and delivery of rockets, missiles and other defence industry products and services, on time and in a way that fully satisfies the requirements and expectations of both the Turkish Armed Forces and global clients.

Roketsan is further committed to conduct these services in full compliance with the laws and legislation currently in force, as well as all applicable national and international standards.

For the purpose of enhancing quality and efficiency, Roketsan will conduct manufacturing activities by continuously implementing the principles of improvement and accuracy.

It will achieve all its objectives through prioritizing the welfare of its employees and by ensuring that manufacturing takes place with full regard for the environment and human health.

Each employee in Roketsan is directly responsible for ensuring that the products are manufactured to the highest quality and for the minimum cost.

In the policy;

The statement 'full regard for the environment and human health' means;

- the prevention of injury and impairment of human health
- the prevention of environmental pollution and the assessment of all risks, including security, involved in the manufacturing of the products

- Assessment of all risks involved in the manufacturing of the products including security

The statement, 'continuous improvement for the purpose of enhancing quality and efficiency' means;

- Continuous improvement for the purpose of enhancing the effectiveness and efficiency of the Quality, Occupational Health and Safety, Environment, Information Security, testing as well as the experimental and calibration performance, taking into consideration state-of-the-art technology,

The statement 'design, manufacture and deliver, on time and in full compliance with national and international standards,' means;

- Designing, manufacturing, servicing, testing and delivering the products on time, and in a way that complies with the current and future Management System standards and/or specifications (ISO 9001, ISO 14001, OHSAS 18001, ISO 27001, ISO 17025, AQAP 2110, CMMI III) that remain part of Roketsan and to the applicable national and international standards, as well as the ethical principles of Roketsan,

The statement "Each employee in Roketsan is directly responsible for ensuring that the products are manufactured to the highest quality" means;

- Each employee in Roketsan is immediately responsible for ensuring that all the documentation (policies, directives, manuals, instructions) that are needed for the effective and efficient performance of his/her duties and responsibilities are understood and principles of information security (confidentiality, integrity, accessibility) are met during all stages of the work.

Roketsan Roket Sanayi ve Ticaret A.Ş. Information Security Policy;

Roketsan Information Security Policy aims to maintain the information security of all the physical and digital information assets that are part of Roketsan's information technology, by fulfilling the requirements of "ISO 27001 Information Security Management" in order to:

- Manage all types of risk against our business sustainability and information assets,
- Safeguard the reliability of the organisation as well as its prestigious image,
- Comply with laws and regulations regarding information security,
- Raise employees' awareness of information security

OUR CORE VALUES ARE

Indigenous production: 100% indigenous,

Excellence: Specialized in the field of rockets and missiles,

Reliability: Strong adherence to ethical rules,

Creativity: Creating new and extraordinary ideas, approaches and solutions,

A Stakeholder-Oriented Approach: Delivering services in alignment with the expectations and requirements of our partners, customers, employees and contractors,

Ambitious and pioneering: Roketsan is a leading entrepreneur in missile technology

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;</p> <p>b) All board members, including non-executive directors.</p>
Score
0
Comments
<p>The company simply makes a general commitment to upholding 'ethical values' without specific mention of tackling bribery and corruption. This commitment does not refer to different categories of employees.</p>
Evidence
<p>[3] Roketsan - Our Policy and Core Values (Website) Accessed 16/09/2019 http://www.roketsan.com.tr/en/kurumsal/politikamiz-ve-oz-degerlerimiz/ Policy Within the context of the National Rocket and Missile Industry Policies, Roketsan is committed to the design, manufacture and delivery of rockets, missiles and other defence industry products and services, on time and in a way that fully satisfies the requirements and expectations of both the Turkish Armed Forces and global clients.</p> <p>Roketsan is further committed to conduct these services in full compliance with the laws and legislation currently in force, as well as all applicable national and international standards.</p> <p>For the purpose of enhancing quality and efficiency, Roketsan will conduct manufacturing activities by continuously implementing the principles of improvement and accuracy.</p> <p>It will achieve all its objectives through prioritizing the welfare of its employees and by ensuring that manufacturing takes place with full regard for the environment and human health.</p> <p>Each employee in Roketsan is directly responsible for ensuring that the products are manufactured to the highest quality and for the minimum cost.</p> <p>In the policy; The statement 'full regard for the environment and human health' means;</p> <ul style="list-style-type: none"> • the prevention of injury and impairment of human health • the prevention of environmental pollution and the assessment of all risks, including security, involved in the manufacturing of the products • Assessment of all risks involved in the manufacturing of the products including security <p>The statement, 'continuous improvement for the purpose of enhancing quality and efficiency' means;</p> <ul style="list-style-type: none"> • Continuous improvement for the purpose of enhancing the effectiveness and efficiency of the Quality, Occupational Health and Safety, Environment, Information Security, testing as well as the experimental and calibration performance, taking into consideration state-of-the-art technology, <p>The statement 'design, manufacture and deliver, on time and in full compliance with national and international standards,' means;</p> <ul style="list-style-type: none"> • Designing, manufacturing, servicing, testing and delivering the products on time, and in a way that complies with the current and future Management System standards and/or specifications (ISO 9001, ISO 14001, OHSAS 18001, ISO 27001, ISO 17025, AQAP 2110, CMMI III) that remain part of Roketsan and to the applicable national and international standards, as well as the ethical principles of Roketsan, <p>The statement "Each employee in Roketsan is directly responsible for ensuring that the products are manufactured to the highest quality" means;</p> <ul style="list-style-type: none"> • Each employee in Roketsan is immediately responsible for ensuring that all the documentation (policies, directives, manuals, instructions) that are needed for the effective and efficient performance of his/her duties and responsibilities are understood and principles of information security (confidentiality, integrity, accessibility) are met during all stages of the work.

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Ambitious and pioneering: Roketsan is a leading entrepreneur in missile technology

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 the company has a specific managerial-level employee with ultimate responsibility for implementing and managing the company’s anti-bribery and corruption programme.
Evidence
No evidence found.

2. Internal Controls

Question
2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?
Score
0
Comments
There is no evidence that the 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 clearly states that its 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
No evidence found.

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

Question
2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?
Score
0
Comments
There is no evidence that the company has an investigative procedure which includes a commitment to report material findings.
Evidence
No evidence found.

Question
2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or bribery and corruption investigations or disciplinary actions involving its employees.
Evidence
No evidence found.

3. Support to Employees

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

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

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

Question
3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
0
Comments
There is no evidence that the company's incentive schemes incorporate ethical or anti-bribery and corruption principles.
Evidence
<p>[4] Performance Management System (Webpage) Accessed 16/09/2019 http://www.roketsan.com.tr/en/performans-yonetim-sistemi/ The performances of Roketsan employees are evaluated periodically with measurable and objective criteria with are pre-determined and shared with them. The reason behind this evaluation is not grading the employee only but finding out good and powerful sides of the individual while determining the poor sides requiring development as well. Thus, the employee can observe the results, and in a sense; outputs, of his / her work and assess the results of his / her individual success. The performance level of each employee of Roketsan enables them to nominate themselves to various positions within the frame of their own career plan.</p> <p>On the other hand, the corporate finds an opportunity to evaluate aspects, such as; the rate of realization of the terms of the labor contract; the level at which the care and competency of the employee is reflected to the work done; the success in the duties, the achievement of the standards in the definition of the job and the direction of the future development of the subject individual.</p>

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

Question
3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?
Score
0
Comments
There is no evidence that the company has a publicly available policy of non-retaliation against whistleblowers or employees who report bribery and corruption incidents.
Evidence
No evidence found.

Question
3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?
Score
0
Comments
There is no evidence that the company has either whistleblowing or advice channels.
Evidence
No evidence found.

4. Conflict of Interest

Question
4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?
Score
1
Comments
<p>There is evidence that the company has a policy for conflict of interest.</p> <p>However, the company receives a score of ‘1’ because the policy does not cover all of the categories of possible conflicts and does not clearly define the types of relationships or conflicts covered under its policy. It is also unclear whether the policy applies to all employees and board members.</p>
Evidence
<p>[1] Roketsan - Business Life (Webpage) Accessed 16/09/2019 http://www.roketsan.com.tr/en/category/haberler/#is-yasami Avoiding Interest Conflicts</p> <p>Roketsan members adopt the principle of avoiding conflicts of interest and do not use the name of Roketsan for the purpose of obtaining personal benefits.</p> <p>Roketsan members do not establish relations with suppliers and subcontractors which clash with the interests of the company or which may adversely affect their decisions and practices, do not act in a manner to create opportunities, either for themselves or for their relatives in connection with the company’s business and do not use corporate sources for their private needs.</p>

Question
4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases?
Score
0
Comments
There is no evidence that the company has procedures to manage conflict of interest or of their oversight.
Evidence
No evidence found.

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

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

5. Customer Engagement

5.1 Contributions, Donations and Sponsorships

Question	
5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?	
Score	
0	
Comments	
There is no evidence that the company has a policy on corporate political contributions.	
Evidence	
<p>[6] ROKETSAN Roket Sanayii Ve Ticaret A.Ş. Esas Sözleşme Değişikliği / ROKETSAN Rocket Industries And Commerce Inc. Change Of The Articles Of Corporation (Document) Accessed 27/09/2019 https://e-sirket.mkk.com.tr/esir/Dashboard.jsp#/belge-goruntuleme/11295 ROKETSAN ROKET SANAYİİ VE TİCARET A.Ş. ESAS SÖZLEŞME DEĞİŞİKLİĞİ</p>	
ESKİ ŞEKLİ	YENİ ŞEKLİ
<p>YÖNETİM VE TEMSİL:</p> <p>MADDE 9: Şirket Yönetim Kurulu tarafından yönetilir ve temsil olunur. Resmi veya özel kuruluşlar ve kişiler, meclisler, mahkemeler, kazai ve idari bütün merciler nezdinde şirketi temsil, ihtilaflarda sulh, ibra ve tahkim yetkileri dahil şirketin her türlü temsili ve yönetimi, Yönetim Kuruluna aittir. Yönetim Kurulu gerek kanun ve gerek işbu esas sözleşme ile açıkça yasaklanmamış bulunan bütün muameleleri yapmaya yetkilidir.</p> <p>Yönetim Kurulu, kendisine bırakılan alanda yönetim, kanun ve esas sözleşme uyarınca Genel Kurulun yetkisinde bırakılmış bulunanlar dışında, şirketin amacının ve işletme konusunun gerçekleştirilmesi için gerekli olan her çeşit iş ve işlemler hakkında karar almaya yetkilidir. Yönetim Kurulu, en az bir Yönetim Kurulu Üyesinin temsil yetkisi haiz olması şartı ile temsil yetkisini Genel Müdür veya şirket personeli olan üçüncü kişilere devredebilir.</p> <p>Yönetim Kurulu, temsile yetkili kişileri ve bunların temsil şekillerini gösterir kararının noterce onaylanmış suretini, tescil ve ilan edilmek üzere ticaret siciline verir ve yetkili imzaları belirten noter tasdikli imza sirkülerinin çıkarılmasını sağlar. Şirket tarafından verilecek bütün belgelerin ve akdolanacak mukavelelerin muteber olabilmesi için bunların şirketin ünvanı altında vazedilecek şirketi temsile</p>	<p>YÖNETİM VE TEMSİL:</p> <p>MADDE 9: Şirket Yönetim Kurulu tarafından yönetilir ve temsil olunur. Resmi veya özel kuruluşlar ve kişiler, meclisler, mahkemeler, kazai ve idari bütün merciler nezdinde şirketi temsil, ihtilaflarda sulh, ibra ve tahkim yetkileri dahil şirketin her türlü temsili ve yönetimi, Yönetim Kuruluna aittir. Yönetim Kurulu gerek kanun ve gerek işbu esas sözleşme ile açıkça yasaklanmamış bulunan bütün muameleleri yapmaya yetkilidir.</p> <p>Yönetim Kurulu, kendisine bırakılan alanda yönetim, kanun ve esas sözleşme uyarınca Genel Kurulun yetkisinde bırakılmış bulunanlar dışında, şirketin amacının ve işletme konusunun gerçekleştirilmesi için gerekli olan her çeşit iş ve işlemler hakkında karar almaya yetkilidir. Yönetim Kurulu, en az bir Yönetim Kurulu Üyesinin temsil yetkisi haiz olması şartı ile temsil yetkisini Genel Müdür veya şirket personeli olan üçüncü kişilere devredebilir.</p> <p>Yönetim Kurulu, temsile yetkili kişileri ve bunların temsil şekillerini gösterir kararının noterce onaylanmış suretini, tescil ve ilan edilmek üzere ticaret siciline verir ve yetkili imzaları belirten noter tasdikli imza sirkülerinin çıkarılmasını sağlar. Şirket tarafından verilecek bütün belgelerin ve akdolanacak mukavelelerin muteber olabilmesi için bunların şirketin ünvanı altında vazedilecek şirketi temsile</p>

<p>yetkili iki imzayı taşıması lazımdır. Şirket Genel Müdürü yargı merciinde şirketi temsil hakkına sahiptir.</p> <p><i>Yönetim Kurulu bir hesap dönemi içerisinde, Genel Kurul tarafından onaylanan en son gelir tablosundaki dönem net karının %005 (onbinde beşi)'ni aşmamak üzere; bilimsel araştırma ve geliştirme faaliyetinde bulunan kurum, kuruluş, vakıf ve derneklere, sosyal amaçlı kurulmuş olan kurum ve benzeri kuruluşlara, kamu yararı niteliği taşıyan okul, sağlık tesisi vb. inşasına veya yararlı görebileceği diğer işlere aynı ve/veya nakdi yardım, hibe ve bağışta bulunabilir.</i></p>	<p>yetkili iki imzayı taşıması lazımdır. Şirket Genel Müdürü yargı merciinde şirketi temsil hakkına sahiptir.</p> <p><i>Bağışların, Genel Kurul'da pay sahiplerinin bilgisine sunulması, yapılacak bağışların üst sınırının Genel Kurul tarafından belirlenmesi suretiyle Şirket; bilimsel araştırma ve geliştirme faaliyetinde bulunan kurum, kuruluş, vakıf ve derneklere, sosyal amaçlı kurulmuş olan kurum ve benzeri kuruluşlara, kamu yararı niteliği taşıyan okul, sağlık tesisi vb. inşasına, Şirket tarafından yararlı görülebilecek diğer işlere aynı ve/veya nakdi yardım ve bağışta bulunabilir. Yardım ve bağışta bulunma kararı almaya Yönetim Kurulu yetkilidir. Şirket, faaliyet alanları ile ilgili konularda hibe kabul edebilir.</i></p>
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Translation:

(**Note:** In the new version of the article, the Turkish word “yapılacak” was misspelled as “yailacak.” The text is translated according to its correct spelling.)

Old Version	New Version
<p>Article 9: The company is managed and represented by the Board of Management. Before all the governmental or private institutions and persons, courts, all the judicial and administrative authorities, the representation of the company, compromises at disputes, including the authorizations of discharges and consolidations, the company's every kind of representation and administration authorization belongs to the Board of Management. Board of Management is authorized to do every proceeding that is not clearly prohibited by law and these articles of incorporation.</p> <p>Board of Management, in all the areas that is left for itself, excluding those authorizations are given to the General Assembly according to law and articles of incorporation, is authorized to take every kind of decision, regarding every kind of work and transaction that is needed for the realization of the purpose of the company and its subject of administration. Board of Management may transfer its authority to represent to General Director or to a third party individual who is an employee of the company, on the condition that at least one member of the Board of Management would still possess the authority to represent.</p> <p>Board of Management provides the documents of assignment of the authorized persons and which indicates their form of representation to trade registry for deferment, and also ensures the procurement of the documents of notarized authorized signature list. For all the documents which are provided by the company, and for all the agreements executed by the company to be considered binding, these documents and agreements must carry two authorized signatures which will represent the provided company, which is under the denotation of the company. General Director</p>	<p>Article 9: The company is managed and represented by the Board of Management. Before all the governmental or private institutions and persons, courts, all the judicial and administrative authorities, the representation of the company, compromises at disputes, including the authorizations of discharges and consolidations, the company's every kind of representation and administration authorization belongs to the Board of Management. Board of Management is authorized to do every proceeding that is not clearly prohibited by law and these articles of incorporation.</p> <p>Board of Management, in all the areas that is left for itself, excluding those authorizations are given to the General Assembly according to law and articles of incorporation, is authorized to take every kind of decision, regarding every kind of work and transaction that is needed for the realization of the purpose of the company and its subject of administration. Board of Management may transfer its authority to represent to General Director or to a third party individual who is an employee of the company, on the condition that at least one member of the Board of Management would still possess the authority to represent.</p> <p>Board of Management provides the documents of assignment of the authorized persons and which indicates their form of representation to trade registry for deferment, and also ensures the procurement of the documents of notarized authorized signature list. For all the documents which are provided by the company, and for all the agreements executed by the company to be considered binding, these documents and agreements must carry two authorized signatures which will represent the provided company, which is under the denotation of the company. General Director</p>

<p>of the company possesses the right to represent the company before a judicial authority.</p> <p><i>The Board of Management, in an accounting period, is not to surpass the amount of %005 (five in ten thousand) of the revenue which is verified by the General Assembly in the most recent table of net income of the period; it may provide in-kind or financial help, grant or make a donation to organizations, foundations and associations, organizations which are founded for social purpose or to similar organizations, to the construction of schools, medical facilities etc. which are for the public benefit or to other works it may consider beneficial.</i></p>	<p>of the company possesses the right to represent the company before a judicial authority.</p> <p><i>The information about donations is to be submitted to shareholders at the General Assembly, and the upper limit of the donations is to be determined by the General Assembly of the company; it may provide in kind or financial help or make a donation to organizations, foundations and associations, organizations which are founded for social purpose or to similar organizations, to the construction of schools, medical facilities etc. which are for the public benefit or to other works which are considered as beneficial by the company. The decision to provide help or to make a donation belongs to the Board of Management. The company may accept a grant on the subjects which are relevant to its field of activities.</i></p>
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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 discloses full details of its political contributions.
Evidence
No evidence found.

Question	
<p>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?</p>	
<p>Score</p> <p>0</p>	
<p>Comments</p> <p>There is evidence that the company has a policy covering donations. However, 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>	
<p>Evidence</p> <p>[6] ROKETSAN Roket Sanayii Ve Ticaret A.Ş. Esas Sözleşme Değişikliği / ROKETSAN Rocket Industries And Commerce Inc. Change Of The Articles Of Corporation (Document) Accessed 27/09/2019 https://e-sirket.mkk.com.tr/esir/Dashboard.jsp#/belge-goruntuleme/11295 ROKETSAN ROKET SANAYİİ VE TİCARET A.Ş. ESAS SÖZLEŞME DEĞİŞİKLİĞİ</p>	
ESKİ ŞEKLİ	YENİ ŞEKLİ
<p>YÖNETİM VE TEMSİL:</p> <p>MADDE 9: Şirket Yönetim Kurulu tarafından yönetilir ve temsil olunur. Resmi veya özel kuruluşlar ve kişiler, meclisler, mahkemeler, kazai ve idari bütün merciler nezdinde şirketi temsil, ihtilaflarda sulh, ibra ve tahkim yetkileri dahil şirketin her türlü temsili ve yönetimi, Yönetim Kuruluna aittir. Yönetim Kurulu gerek kanun ve gerek işbu esas sözleşme ile açıkça yasaklanmamış bulunan bütün muameleleri yapmaya yetkilidir.</p> <p>Yönetim Kurulu, kendisine bırakılan alanda yönetim, kanun ve esas sözleşme uyarınca Genel Kurulun yetkisinde bırakılmış bulunanlar dışında, şirketin amacının ve işletme konusunun gerçekleştirilmesi için gerekli olan her çeşit iş ve işlemler hakkında karar almaya yetkilidir. Yönetim Kurulu, en az bir Yönetim Kurulu Üyesinin temsil yetkisi haiz olması şartı ile temsil yetkisini Genel Müdür veya şirket personeli olan üçüncü kişilere devredebilir.</p> <p>Yönetim Kurulu, temsile yetkili kişileri ve bunların temsil şekillerini gösterir kararının noterce onaylanmış suretini, tescil ve ilan edilmek üzere ticaret siciline verir ve yetkili imzaları belirten noter tasdikli imza sirkülerinin çıkarılmasını sağlar. Şirket tarafından verilecek bütün belgelerin ve akdolanacak mukavelelerin muteber olabilmesi için bunların şirketin ünvanı altında vazedilecek şirketi temsile yetkili iki imzayı taşıması lazımdır. Şirket Genel Müdürü yargı merciinde şirketi temsil hakkına sahiptir.</p>	<p>YÖNETİM VE TEMSİL:</p> <p>MADDE 9: Şirket Yönetim Kurulu tarafından yönetilir ve temsil olunur. Resmi veya özel kuruluşlar ve kişiler, meclisler, mahkemeler, kazai ve idari bütün merciler nezdinde şirketi temsil, ihtilaflarda sulh, ibra ve tahkim yetkileri dahil şirketin her türlü temsili ve yönetimi, Yönetim Kuruluna aittir. Yönetim Kurulu gerek kanun ve gerek işbu esas sözleşme ile açıkça yasaklanmamış bulunan bütün muameleleri yapmaya yetkilidir.</p> <p>Yönetim Kurulu, kendisine bırakılan alanda yönetim, kanun ve esas sözleşme uyarınca Genel Kurulun yetkisinde bırakılmış bulunanlar dışında, şirketin amacının ve işletme konusunun gerçekleştirilmesi için gerekli olan her çeşit iş ve işlemler hakkında karar almaya yetkilidir. Yönetim Kurulu, en az bir Yönetim Kurulu Üyesinin temsil yetkisi haiz olması şartı ile temsil yetkisini Genel Müdür veya şirket personeli olan üçüncü kişilere devredebilir.</p> <p>Yönetim Kurulu, temsile yetkili kişileri ve bunların temsil şekillerini gösterir kararının noterce onaylanmış suretini, tescil ve ilan edilmek üzere ticaret siciline verir ve yetkili imzaları belirten noter tasdikli imza sirkülerinin çıkarılmasını sağlar. Şirket tarafından verilecek bütün belgelerin ve akdolanacak mukavelelerin muteber olabilmesi için bunların şirketin ünvanı altında vazedilecek şirketi temsile yetkili iki imzayı taşıması lazımdır. Şirket Genel Müdürü yargı merciinde şirketi temsil hakkına sahiptir.</p>

Yönetim Kurulu bir hesap dönemi içerisinde, Genel Kurul tarafından onaylanan en son gelir tablosundaki dönem net karının %005 (onbinde beşi)'ni aşmamak üzere; bilimsel araştırma ve geliştirme faaliyetinde bulunan kurum, kuruluş, vakıf ve derneklere, sosyal amaçlı kurulmuş olan kurum ve benzeri kuruluşlara, kamu yararı niteliği taşıyan okul, sağlık tesisi vb. inşasına veya yararlı görebileceği diğer işlere aynı ve/veya nakdi yardım, hibe ve bağışta bulunabilir.

Bağışların, Genel Kurul'da pay sahiplerinin bilgisine sunulması, yapılacak bağışların üst sınırının Genel Kurul tarafından belirlenmesi suretiyle Şirket; bilimsel araştırma ve geliştirme faaliyetinde bulunan kurum, kuruluş, vakıf ve derneklere, sosyal amaçlı kurulmuş olan kurum ve benzeri kuruluşlara, kamu yararı niteliği taşıyan okul, sağlık tesisi vb. inşasına, Şirket tarafından yararlı görülebilecek diğer işlere aynı ve/veya nakdi yardım ve bağışta bulunabilir. Yardım ve bağışta bulunma kararı almaya Yönetim Kurulu yetkilidir. Şirket, faaliyet alanları ile ilgili konularda hibe kabul edebilir.

Translation:

(**Note:** In the new version of the article, the Turkish word “yapılacak” was misspelled as “yılacak.” The text is translated according to its correct spelling.)

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<p><i>thousand) of the revenue which is verified by the General Assembly in the most recent table of net income of the period; it may provide in-kind or financial help, grant or make a donation to organizations, foundations and associations, organizations which are founded for social purpose or to similar organizations, to the construction of schools, medical facilities etc. which are for the public benefit or to other works it may consider beneficial.</i></p>	<p><i>limit of the donations is to be determined by the General Assembly of the company; it may provide in kind or financial help or make a donation to organizations, foundations and associations, organizations which are founded for social purpose or to similar organizations, to the construction of schools, medical facilities etc. which are for the public benefit or to other works which are considered as beneficial by the company. The decision to provide help or to make a donation belongs to the Board of Management. The company may accept a grant on the subjects which are relevant to its field of activities.</i></p>
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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 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
0
Comments
There is no publicly available evidence that the company has a policy or procedure on gifts or hospitality.
Evidence
No evidence found.

6. Supply Chain Management

Question
6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?
Score
0
Comments
There is no evidence that the company requires the involvement of its procurement department in the establishment and oversight of its supplier base.
Evidence
No evidence found.

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

Question
6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?
Score
0
Comments
There is no evidence that the company ensures that its suppliers have anti-bribery and corruption policies in place that meet a high standard.
Evidence
No evidence found.

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

Question
6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or anti-bribery and corruption investigations relating to its suppliers, or the associated disciplinary actions.
Evidence
No evidence found.

7. Agents, Intermediaries and Joint Ventures

7.1 Agents and Intermediaries

Question
7.1.1 Does the company have a clear policy on the use of agents?
Score
0
Comments
There is no 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 and/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 all of its joint ventures.
Evidence
No evidence found.

8. Offsets

Question
8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?
Score
0
Comments
There is no evidence that the corruption risks associated with offset contracting are addressed, and there is no evidence that a dedicated body, department or team is responsible for monitoring of the company's offset activities.
Evidence
No evidence found.

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

9. High Risk Markets

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

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

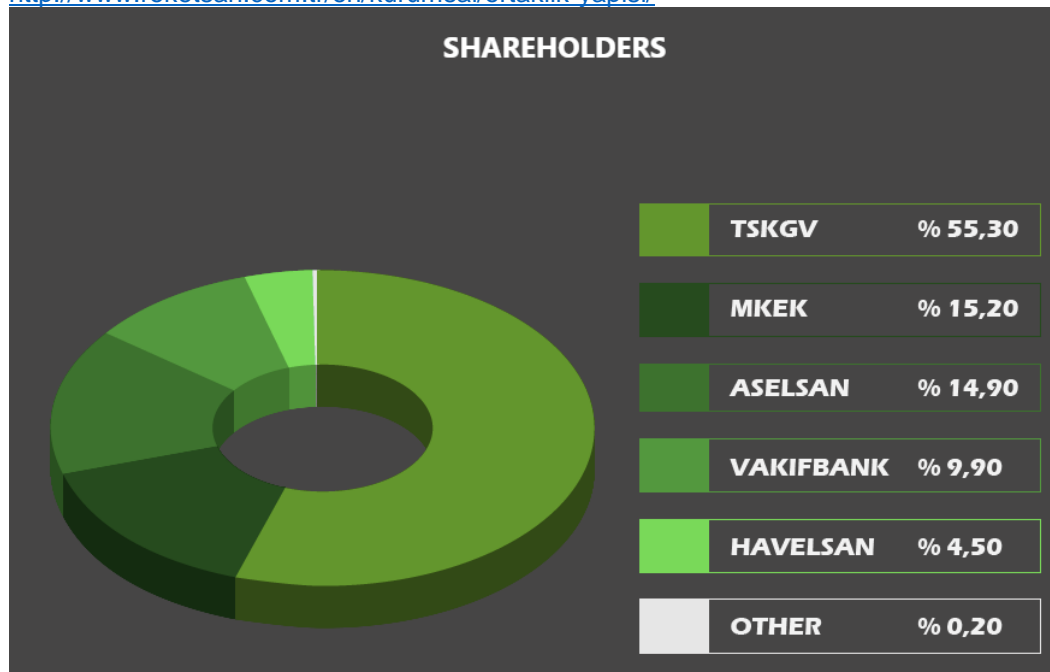
Question**9.3 Does the company disclose its beneficial ownership and control structure?****Score****1****Comments**

The company discloses all beneficial owners with a stake in the company. All individuals or entities are referred to by name, along with their percentage ownership in the company.

However, the company receives a score of '1' because it does not disclose details of its ownership in a corporate register.

Evidence**[9] Roketsan – Shareholders (Webpage)**

Accessed 30/03/2020

<http://www.roketsan.com.tr/en/kurumsal/ortaklik-yapisi/>


[5] ROKETSAN Roket Sanayii ve Ticaret Anonim Şirketi'nin 12 Nisan 2019 Tarihinde Yapılan Olağan Genel Kurul Toplantısı Tutanağı/ Official Report of the ROKETSAN Rocket Industries Incorporated Company's Stated General Assembly Meeting Which Was Held on 12 April 2019 (Document)

Accessed 27/09/2019

<https://e-sirket.mkk.com.tr/esir/Dashboard.jsp#/belge-goruntuleme/11295>

[p.1]

Hazır bulunanlar listesinin tetkikinde, Şirket paylarının 147.052.860,85 TL toplam itibari değerinin; toplam itibari değeri 146.829.763,40 TL olan, 14.682.976.340 payın temsilen olmak üzere toplantıda temsil edildiği ve böylece gerek kanun gerekse esas sözleşmede öngörülen asgari toplantı nisabının aşağıda verilen tablodan da görüleceği üzere mevcut olduğunun anlaşılması üzerine toplantı Yönetim Kurulu Başkanı Faruk YİĞİT tarafından saat 14:00'te açılarak gündemin görüşülmesine geçilmiştir.

Toplantıya katılan pay sahipleri, sahip oldukları paylar ve katılımcı bilgileri;

Pay Sahibi	Pay Adedi	Pay Tutarı (TL)	Katılımcı
Türk Silahlı Kuvvetlerini Güçlendirme Vakfı	8.137.812.041	81.378.120,41	Prof. Dr. İsmail DEMİR
Makina ve Kimya Endüstrisi Kurumu	2.230.779.827	22.307.798,27	Hayrettin ÖZDEN
Aselsan Elektronik Sanayi ve Ticaret A.Ş.	2.190.622.286	21.906.222,86	Hakan KARATAŞ
T.Vakıflar Bankası T.A.O.	1.460.414.858	14.604.148,58	Hasan EMRE
Havelsan Hava Elektronik Sanayi ve Ticaret AŞ.	661.860.012	6.618.600,12	Fethi AZAKLI
İşbir Elektrik Sanayi A.Ş.	1.487.316	14.873,16	Zeynep DOĞANAY
TOPLAM	14.682.976.340	146.829.763,40	

Not : Pay sahiplerinden 22.309.745 adet paya sahip olan Navitas Dış Ticaret ve Elektrik Sanayi A.Ş. temsilcisi toplantıya katılmamıştır.

Translation:

[p.1] In the survey of the list of participants, the nominal total value of the shares of the company which is 14.682.976,85 TL; total nominal value being 146.829.763,40 TL, it is understood that the minimum amount of share of 14.682.976.340 is represented and therefore as the rule of law and articles of incorporation projects, and as the chart below shows that the quorum of the meeting is understood to be present, the meeting was opened by the Head Chairman of the Board Faruk YİĞİT at 14:00 with the discussion of the order of the day.

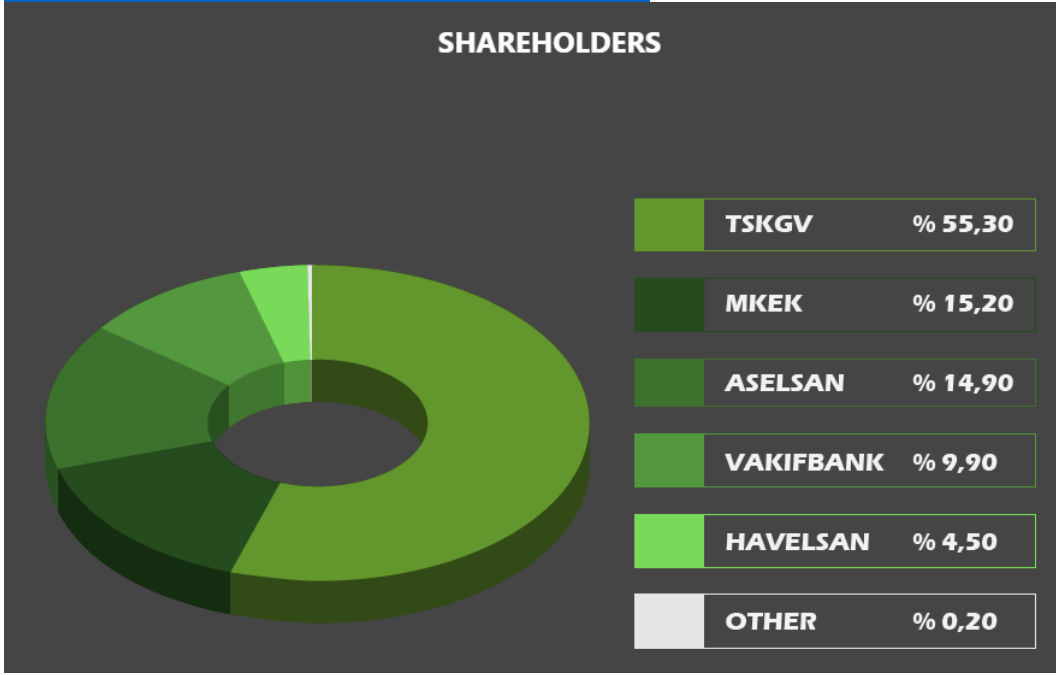
The shareholders who attended the meeting, their shares and the information of participants;

Shareholder	Number of Shares	Value of Shares (TL)	Participant
Turkish Armed Forces Foundation	8.137.812.041	81.378.120,47	Prof. Dr. İsmail DEMİR
Mechanical and Chemical Industry Company	2.230.779.827	22.307.798,27	Hayrettin ÖZDEN
Aselsan Electronics Industry and Commerce Inc.	2.190.622.286	21.906.222,86	Hakan KARATAŞ
Turkish Foundations Bank T.A.O. (VakıfBank)	1.460.414.858	14.604.148,58	Hasan EMRE
Havelsan Aviation Electronics and Commerce Inc.	660.860.012	6.618.600,12	Fethi AZAKLI
İşbir Electric Industries Inc.	1.487.316	14.873,16	Zeynep DOĞANAY
Total	14.682.976.340	146.829.763,40	-

Note: One of the representatives of the shareholders who holds 22.309.745 of shares, Navitas Foreign Trade and Electronics Inc., did not attend to meeting.

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 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														
1														
Comments														
<p>The SOE publishes some information that can be inferred to relate to shareholding voting rights.</p> <p>However, the company receives a score of '1' because the information is inconclusive and incomplete.</p>														
Evidence														
<p>[9] Roketsan – Shareholders (Webpage) Accessed 30/03/2020 http://www.roketsan.com.tr/en/kurumsal/ortaklik-yapisi/</p>  <table border="1"> <thead> <tr> <th>Shareholder</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>TSKGV</td> <td>% 55,30</td> </tr> <tr> <td>MKEK</td> <td>% 15,20</td> </tr> <tr> <td>ASELSAN</td> <td>% 14,90</td> </tr> <tr> <td>VAKIFBANK</td> <td>% 9,90</td> </tr> <tr> <td>HAVELSAN</td> <td>% 4,50</td> </tr> <tr> <td>OTHER</td> <td>% 0,20</td> </tr> </tbody> </table>	Shareholder	Percentage	TSKGV	% 55,30	MKEK	% 15,20	ASELSAN	% 14,90	VAKIFBANK	% 9,90	HAVELSAN	% 4,50	OTHER	% 0,20
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<p>[5] ROKETSAN Roket Sanayii ve Ticaret Anonim Şirketi'nin 12 Nisan 2019 Tarihinde Yapılan Olağan Genel Kurul Toplantısı Tutanağı/ Official Report of the ROKETSAN Rocket Industries Incorporated Company's Stated General Assembly Meeting Which Was Held on 12 April 2019 (Document) Accessed 27/09/2019 https://e-sirket.mkk.com.tr/esir/Dashboard.jsp#/belge-goruntuleme/11295 [p.1]</p>														

Hazır bulunanlar listesinin tetkikinde, Şirket paylarının 147.052.860,85 TL toplam itibari değerinin; toplam itibari değeri 146.829.763,40 TL olan, 14.682.976.340 payın temsilen olmak üzere toplantıda temsil edildiği ve böylece gerek kanun gerekse esas sözleşmede öngörülen asgari toplantı nisabının aşağıda verilen tablodan da görüleceği üzere mevcut olduğunun anlaşılması üzerine toplantı Yönetim Kurulu Başkanı Faruk YİĞİT tarafından saat 14:00'te açılarak gündemin görüşülmesine geçilmiştir.

Toplantıya katılan pay sahipleri, sahip oldukları paylar ve katılımcı bilgileri;

Pay Sahibi	Pay Adedi	Pay Tutarı (TL)	Katılımcı
Türk Silahlı Kuvvetlerini Güçlendirme Vakfı	8.137.812.041	81.378.120,41	Prof. Dr.İsmail DEMİR
Makina ve Kimya Endüstrisi Kurumu	2.230.779.827	22.307.798,27	Hayrettin ÖZDEN
Aselsan Elektronik Sanayi ve Ticaret A.Ş.	2.190.622.286	21.906.222,86	Hakan KARATAŞ
T.Vakıflar Bankası T.A.O.	1.460.414.858	14.604.148,58	Hasan EMRE
Havelsan Hava Elektronik Sanayi ve Ticaret AŞ.	661.860.012	6.618.600,12	Fethi AZAKLI
İşbir Elektrik Sanayi A.Ş.	1.487.316	14.873,16	Zeynep DOĞANAY
TOPLAM	14.682.976.340	146.829.763,40	

Not : Pay sahiplerinden 22.309.745 adet paya sahip olan Navitas Dış Ticaret ve Elektrik Sanayi A.Ş. temsilcisi toplantıya katılmamıştır.

Translation:

[p.1] In the survey of the list of participants, the nominal total value of the shares of the company which is 14.682.976,85 TL; total nominal value being 146.829.763,40 TL, it is understood that the minimum amount of share of 14.682.976.340 is represented and therefore as the rule of law and articles of incorporation projects, and as the chart below shows that the quorum of the meeting is understood to be present, the meeting was opened by the Head Chairman of the Board Faruk YİĞİT at 14:00 with the discussion of the order of the day.

The shareholders who attended the meeting, their shares and the information of participants;

Shareholder	Number of Shares	Value of Shares (TL)	Participant
Turkish Armed Forces Foundation	8.137.812.041	81.378.120,47	Prof. Dr. İsmail DEMİR
Mechanical and Chemical Industry Company	2.230.779.827	22.307.798,27	Hayrettin ÖZDEN
Aselsan Electronics Industry and Commerce Inc.	2.190.622.286	21.906.222,86	Hakan KARATAŞ
Turkish Foundations Bank T.A.O. (VakıfBank)	1.460.414.858	14.604.148,58	Hasan EMRE
Havelsan Aviation Electronics and Commerce Inc.	660.860.012	6.618.600,12	Fethi AZAKLI
İşbir Electric Industries Inc.	1.487.316	14.873,16	Zeynep DOĞANAY
Total	14.682.976.340	146.829.763,40	-

Note: One of the representatives of the shareholders who holds 22.309.745 of shares, Navitas Foreign Trade and Electronics Inc., did not attend to meeting.

Question
10.2 Are the SOE's commercial and public policy objectives publicly available?
Score
0
Comments
There is no evidence that the SOE publishes its commercial or public policy objectives.
Evidence
<p>[7] Roketsan - Mission and Vision (Webpage) Accessed 30/09/2019 http://www.roketsan.com.tr/en/kurumsal/misyon-vizyon/ Our Mission To serve the country defense with our rocket and missile systems.</p> <p>Our Vision To become the leading establishment of rocket and missile systems, from the depth of the seas to the heights of the sky.</p>

Question
10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?
Score
0
Comments
The SOE publishes limited information on its board members. However, the information disclosed is insufficient to satisfy the requirements of a score of '1'.
Evidence
<p>[8] Yönetim Kurulu/Board of Directors (Webpage) Accessed 30/03/2020 https://e-sirket.mkk.com.tr/esir/Dashboard.jsp#/sirketbilgileri/11295</p> <p>Board of Directors</p> <p>Chairman of the Board Name surname : Faruk YIGIT CV:</p> <p>Vice Chairman of the Board Name surname : Mustafa AYSAN CV:</p> <p>board member Name surname : GÜRCAN OKUMUŞ CV:</p> <p>board member Name surname : MUHSİN DERE CV:</p> <p>board member Name surname : MEHMET ERTUĞRUL ÇANKIRILI CV:</p> <p>board member Name surname : MUSA ŞAHİN CV:</p> <p>board member Name surname : Veysel ÜNVERDİ CV:</p>

Question
10.4 Is the SOE's audit committee composed of a majority of independent directors?
Score
0
Comments
There is no evidence that the SOE's audit committee is composed of majority independent directors or 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 SOE 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	Roketsan – Business Life	16/09/2019	http://www.roketsan.com.tr/en/kurumsal/etik-ilkelerimiz/
02	Webpage	Roketsan - Code	16/09/2019	https://www.roketsan.com.tr/en/kurumsal/etik-ilkelerimiz/
03	Webpage	Roketsan - Our Policy and Core	16/09/2019	http://www.roketsan.com.tr/en/kurumsal/politikamiz-ve-oz-degerlerimiz/
04	Webpage	Performance Management System	16/09/2019	http://www.roketsan.com.tr/en/performans-yonetim-sistemi/
05	Document	ROKETSAN Roket Sanayii ve Ticaret Anonim Şirketi'nin 12 Nisan 2019 Tarihinde Yapılan Olağan Genel Kurul Toplantısı Tutanağı/ Official Report of the ROKETSAN Rocket Industries Incorporated Company's Stated General Assembly Meeting Which Was Held on 12 April 2019	27/09/2019	https://e-sirket.mkk.com.tr/esir/Dashboard.jsp#/belge-goruntuleme/11295
06	Document	ROKETSAN ROKET SANAYİİ VE Ticaret A.Ş. Esas Sözleşme Değişikliği / Roketsan Rocket Industries and Commerce Inc. Change Of The Articles Of Corporation	27/09/2019	https://e-sirket.mkk.com.tr/esir/Dashboard.jsp#/belge-goruntuleme/11295
07	Webpage	Roketsan - Mission and Vision	30/09/2019	https://www.roketsan.com.tr/en/kurumsal/misyon-vizyon/
08	Webpage	Yönetim Kurulu/Board of Directors	30/09/2019	https://e-sirket.mkk.com.tr/esir/Dashboard.jsp#/sirketbilgileri/11295
09	Webpage	Roketsan – Shareholders	30/03/2020	https://www.roketsan.com.tr/en/kurumsal/ortaklik-yapisi/