

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

### FINAL ASSESSMENT

### TATRA TRUCKS 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	4/8
2. Internal Controls	6	3/12
3. Support to Employees	7	1/14
4. Conflict of Interest	4	1/8
5. Customer Engagement	7	2/14
6. Supply Chain Management	5	2/10
7. Agents, Intermediaries and Joint Ventures	10	1/20
8. Offsets	3	0/6
9. High Risk Markets	4	0/8
10. State-Owned Enterprises	0	N/A
<b>TOTAL</b>		<b>12/100</b>
<b>BAND</b>		<b>F</b>

\*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

<b>Question</b>
<b>1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?</b>
<b>Score</b>
1
<b>Comments</b>
<p>There is evidence that the company publishes a general anti-bribery and corruption commitment as part of its Code of Ethics. The Code of Ethics is endorsed by the company’s CEO. However, the company receives a score of ‘1’ because the statement from the CEO does not specifically mention and address the company’s stance against bribery and corruption, referring instead to integrity and highest ethical standards.</p>
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>                  [p.1] TATRA TRUCKS’ Code of Ethics</p> <p>This Code of Ethics is mandatory for all employees in either technical or worker professions, management of all companies as well as the management of the company and members of the Executive Board. Some of its contents are applicable to specific employee companys (e.g. sales specialists) or involve entities outside of TATRA TRUCKS (e.g. contractors and dealers) in the Czech Republic as well as abroad where TATRA TRUCKS is active. TATRA TRUCKS requires its employees and partners to adhere to law as well as highest ethical standards based on honest actions, trust, transparency, openness, integrity and responsibility.</p> <p>[...]</p> <p>[p.2] The purpose of this Code of Ethics is not only to be applied by TATRA TRUCKS, but also to support the anti-corruption agenda and honest business principles in front of the public as well as in the business sector in the Czech Republic and abroad.</p> <p>This Code of Ethics takes effect from January 1st, 2016.</p> <p>Martin Bednarz CEO TATRA TRUCKS</p>

<b>Question</b>
<p><b>1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories:</b></p> <p><b>a) All employees, including staff and leadership of subsidiaries and other controlled entities;</b></p> <p><b>b) All board members, including non-executive directors.</b></p>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company publishes an anti-bribery and corruption policy as part of its Code of Ethics. There is evidence that this policy clearly prohibits bribery and facilitation payments. This policy applies to all staff and board members, as well as the staff and leadership of its wider corporate group.</p> <p>However, the company receives a score of '1' because there is no clear evidence that its anti-corruption policy prohibits commercial bribery and payments to public officials.</p>
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>  [p.1] TATRA TRUCKS' Code of Ethics</p> <p>This Code of Ethics is mandatory for all employees in either technical or worker professions, management of all companies as well as the management of the company and members of the Executive Board. Some of its contents are applicable to specific employee companys (e.g. sales specialists) or involve entities outside of TATRA TRUCKS (e.g. contractors and dealers) in the Czech Republic as well as abroad where TATRA TRUCKS is active.</p> <p>TATRA TRUCKS requires its employees and partners to adhere to law as well as highest ethical standards based on honest actions, trust, transparency, openness, integrity and responsibility.</p> <p>TATRA TRUCKS has joined Transparency International's anti-corruption program for the field of Defence technology and its employees are required to familiarize with requirements of this program and act in its spirit.</p> <p>[...]</p> <p>TATRA TRUCKS strictly forbids its employees to engage in any form of corruption. In case the corruption is confirmed, a compensation for the damage caused to the Company will be required. In most cases, the corruption will result in immediate termination of employment. In adherence with law, the case will be immediately reported to the Police of the Czech Republic with a possible outcome of a criminal prosecution.</p> <p>[p.2] At some foreign markets, the state employees are allowed to legally require facilitation payments. It is strictly forbidden for TATRA TRUCKS companies to provide these payments. The facilitation payments do not include business provisions for private sector partners, e.g. based on dealer agreements, licence agreements or sales representative contracts.</p> <p>[...]</p> <p>The purpose of this Code of Ethics is not only to be applied by TATRA TRUCKS, but also to support the anti-corruption agenda and honest business principles in front of the public as well as in the business sector in the Czech Republic and abroad.</p> <p><b>[1] Anti-Corruption Programme (Webpage)</b>  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>  TATRA TRUCKS' CODE OF ETHICS</p>

One of the key components of the TATRA TRUCKS' anti-corruption program is the Code of Ethics for the holding's employees who are obliged to adhere to it. Some of its provisions also concern TATRA TRUCKS' partners, e.g. sales representatives and dealers. The TATRA TRUCKS' Code of Ethics is based on requirements of the UK-based Transparency International. The Codex includes:

- the ban of corruption
- the ban of conflicts of interest
- reporting of corruptive of unethical behaviour
- special duties of sales departments concerning fulfilling the anti-corruption program
- rules of sponsorship and donations to political parties and movements
- the commitment to spread the anti-corruption program beyond TATRA TRUCKS

[...]

#### FACILITATION PAYMENTS

At some foreign markets, the state employees are allowed to legally require facilitation payments. It is strictly forbidden for TATRA TRUCKS to provide these payments. The facilitation payments do not include business provisions for private sector partners, e.g. based on dealer agreements, licence agreements or sales representative contracts.

<b>Question</b>
<b>1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
There is some publicly available evidence that the company’s Executive Board is responsible for oversight of its anti-bribery and corruption programme. However, the company receives a score of ‘1’ because there is no further evidence to suggest that it engages in formal oversight functions or that it has the authority to require that changes are made.
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a></p> <p>[p.1] General responsibility for execution and operation of TATRA TRUCKS’s anti-corruption program lies with the Executive Board. The program is managed by TATRA TRUCKS’s HR Manager who is provided with direct access to the members of the Executive Board in order to secure its effectivity. He is also responsible for a continuous operation of ethical and anti-corruption agenda in the Company. Furthermore, he is tasked with assessment of the program’s efficacy and implementation of suspected corruption formal solving process.</p>

<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
There is evidence that a managerial-level individual has been assigned ultimate responsibility for implementing and managing the company's anti-bribery and corruption programme. However, the company receives a score of '1' because it is not clear that this individual is a senior executive and there is no clear evidence that they have a direct reporting line to the company's board of directors.
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a></p> <p>[p.1] General responsibility for execution and operation of TATRA TRUCKS's anti-corruption program lies with the Executive Board. The program is managed by TATRA TRUCKS's HR Manager who is provided with direct access to the members of the Executive Board in order to secure its effectivity. He is also responsible for a continuous operation of ethical and anti-corruption agenda in the Company. Furthermore, he is tasked with assessment of the program's efficacy and implementation of suspected corruption formal solving process.</p>

## 2. Internal Controls

<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company has a formal bribery and corruption risk assessment procedure that informs the design of the anti-corruption and bribery programme. However, the company receives a score of '1' because there is no evidence that it conducts such corruption risk assessments annually, or that the results of assessments are reviewed at board level.</p>
<b>Evidence</b>
<p><b>[1] Anti-Corruption Programme (Webpage)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>                  TATRA TRUCKS has decided to implement an anti-corruption program, whose goals are:</p> <p>a) to minimize corruption risk in the business activities of TATRA TRUCKS,                  b) work preventively against corruption risks inside the company while providing products and services for the company,                  c) to set an example as a significant part of Czech industry on how to act in preventing corruption and unethical behaviour.</p> <p>TATRA TRUCKS' anti-corruption program consists of:</p> <ul style="list-style-type: none"> <li>• the Code of Ethics of TATRA TRUCKS' employees with a special part dedicated to public contracts,</li> <li>• the Ethics Line that can be used by anybody to report corruptive or unethical behaviour in regard to TATRA TRUCKS,</li> <li>• a set of processes and measures designed to assess the corruption risks with respect to the company activities, groups of employees or specifics of individual markets where TATRA TRUCKS is present.</li> </ul>

<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company's anti-bribery and corruption programme is subject to regular internal review, led by the company's HR manager, and that this individual is responsible for implementing necessary changes to the programme.</p> <p>However, the company receives a score of '1' because the frequency of such reviews is unclear and there is no evidence that findings are presented to the board.</p>
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a></p> <p>[p.1] General responsibility for execution and operation of TATRA TRUCKS's anti-corruption program lies with the Executive Board. The program is managed by TATRA TRUCKS's HR Manager who is provided with direct access to the members of the Executive Board in order to secure its effectivity. He is also responsible for a continuous operation of ethical and anti-corruption agenda in the Company. Furthermore, he is tasked with assessment of the program's efficacy and implementation of suspected corruption formal solving process.</p>



<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>The company publicly commits to investigating incidents, and there is a specific procedure in place to deal with whistleblowing cases, which stipulates documentation and actions to be taken at each step. The company also states that it will provide whistleblowers with updates on the outcome of investigations.</p> <p>However, the company receives a score of '1' because there is no evidence that investigations are handled by an independent team or report to an independent board member. In addition, the company does not provide further information on its investigative process, from receipt to final outcome. There is also no evidence that a central body reviews summary information on investigations on at least an annual basis.</p>
<b>Evidence</b>
<p><b>[1] Anti-Corruption Programme (Webpage)</b>  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>  TATRA TRUCKS' ETHICAL LINE (ET-LINK)</p> <p>To create a unified reporting channel for testimonies of unethical, corruptive, illegal, unsafe or environment-damaging behaviour, the TATRA TRUCKS has created the Ethics Line which can be used by anybody to report the above-mentioned problematic behaviour either in the form of</p> <p>a) leaving a voice message at telephone number +420 733 678 454, or</p> <p>b) sending a report to etlink@tatra.cz .</p> <p>TATRA TRUCKS prefers that the reports are not anonymous as such reports themselves pose a risk of unethical behaviour and abuse of the Ethics Line. However, nobody can be forced to leave his name.</p> <p>The receiver of all reports is the HR department of TATRA TRUCKS which in case the report has been submitted by e-mail acknowledges the message's acceptance and informs the sender within 14 days about taken steps. After the report has been investigated, the sender is notified about the result.</p> <p>TATRA TRUCKS declares that they value reasonable reports submitted to the Ethics Line. However, this does not apply to false reports with the aim to unjustly accuse another person or company. Such report itself is a breach of the Code of Ethics and TATRA TRUCKS' anti-corruption program with all associated consequences.</p> <p><b>[2] Code of Ethics (Document)</b>  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a></p> <p>[p.1] In case of a substantial suspicion of unethical or corrupt behaviour as well as behaviour violating the workplace safety or environmental protection or threatening TATRA TRUCKS's reputation, the employee or any other person who learns of such behaviour should report this behaviour by the means of the Company's Ethical Line. However, under no circumstances should there be reports that are malicious, not based on evidence or even fictitious with the intent of harming another person. In case of submitting such reports, the person who did so is fully responsible for their actions and they</p> <p>[p.2] may be sanctioned on the grounds of violating the trust and standard work relations in the Company. Such reports are themselves in conflict with the Code of Ethics.</p>

<b>Question</b>
2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?
<b>Score</b>
0
<b>Comments</b>
There is no publicly available evidence that the company takes steps to ensure the quality of its investigations.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company has an investigative procedure which includes a commitment to report material findings of corruption to the board of directors. The company indicates that it may report findings from investigations to relevant authorities if necessary, but there is no evidence that a senior individual is responsible for ensuring that such disclosures are evaluated and acted upon.
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>  [p.1] TATRA TRUCKS strictly forbids its employees to engage in any form of corruption. In case the corruption is confirmed, a compensation for the damage caused to the Company will be required. In most cases, the corruption will result in immediate termination of employment. In adherence with law, the case will be immediately reported to the Police of the Czech Republic with a possible outcome of a criminal prosecution.</p>

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

### 3. Support to Employees

<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company provides anti-bribery and anti-corruption training to its employees.
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>                  [p.1] TATRA TRUCKS has joined Transparency International’s anti-corruption program for the field of Defence technology and its employees are required to familiarize with requirements of this program and act in its spirit.</p>

<b>Question</b>
<p><b>3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees:</b></p> <ul style="list-style-type: none"> <li><b>a) Employees in high risk positions,</b></li> <li><b>b) Middle management,</b></li> <li><b>c) Board members.</b></li> </ul>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>There is no evidence that the company provides anti-bribery and corruption training to its employees, nor that it tailors this training to certain employees based on an assessment of their role and exposure to corruption risk.</p>
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>                  [p.1] TATRA TRUCKS has joined Transparency International’s anti-corruption program for the field of Defence technology and its employees are required to familiarize with requirements of this program and act in its spirit.</p>

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

<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company's incentive schemes for employees incorporate ethical or anti-bribery and corruption principles.
<b>Evidence</b>
No evidence found.



<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company commits to support and protect employees who refuse to act unethically.
<b>Evidence</b>
No evidence found.

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

<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company provides confidential whistleblowing and reporting channels for its employees. The company indicates that reports may be made anonymously, but there is evidence that the company discourages anonymous reporting to avoid abuses of the channel.</p> <p>However, the company receives a score of '1' because there is no evidence that it provides employees with an external reporting channel, such as an independently operated hotline. There is also no evidence that reports made through the company's channels are confidential. In addition, there is no clear evidence that these channels are available to all employees in any country of operation, or in multiple languages, or to any employees of third parties, suppliers or joint venture partners.</p>
<b>Evidence</b>
<p><b>[1] Anti-Corruption Programme (Webpage)</b>  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>  TATRA TRUCKS' anti-corruption program consists of:</p> <p>the Code of Ethics of TATRA TRUCKS' employees with a special part dedicated to public contracts, the Ethics Line that can be used by anybody to report corruptive or unethical behaviour in regard to TATRA TRUCKS,</p> <p>[...]</p> <p>TATRA TRUCKS' ETHICAL LINE (ET-LINK)</p> <p>To create a unified reporting channel for testimonies of unethical, corruptive, illegal, unsafe or environment-damaging behaviour, the TATRA TRUCKS has created the Ethics Line which can be used by anybody to report the above-mentioned problematic behaviour either in the form of</p> <ul style="list-style-type: none"> <li>a) leaving a voice message at telephone number +420 733 678 454, or</li> <li>b) sending a report to etlink@tatra.cz .</li> </ul> <p>TATRA TRUCKS prefers that the reports are not anonymous as such reports themselves pose a risk of unethical behaviour and abuse of the Ethics Line. However, nobody can be forced to leave his name.</p> <p>The receiver of all reports is the HR department of TATRA TRUCKS which in case the report has been submitted by e-mail acknowledges the message's acceptance and informs the sender within 14 days about taken steps. After the report has been investigated, the sender is notified about the result.</p> <p>TATRA TRUCKS declares that they value reasonable reports submitted to the Ethics Line. However, this does not apply to false reports with the aim to unjustly accuse another person or company. Such report itself is a breach of the Code of Ethics and TATRA TRUCKS' anti-corruption program with all associated consequences.</p> <p><b>[2] Code of Ethics (Document)</b>  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>  [p.1] In case of a substantial suspicion of unethical or corrupt behaviour as well as behaviour violating the workplace safety or environmental protection or threatening TATRA TRUCKS's reputation, the employee or any other person who learns of such behaviour should report this behaviour by the means of the Company's Ethical Line. However, under no circumstances should there be reports that are malicious, not based on evidence or even</p>

fictitious with the intent of harming another person. In case of submitting such reports, the person who did so is fully responsible for their actions and they ...

[p.2] ... may be sanctioned on the grounds of violating the trust and standard work relations in the Company. Such reports are themselves in conflict with the Code of Ethics.

## 4. Conflict of Interest

Question
<p><b>4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?</b></p>
Score
1
Comments
<p>There is evidence that the company has a policy on conflicts of interest, which applies to all employees and board members. The company's policy makes specific reference to possible conflicts arising from financial interests and personal relationships.</p> <p>However, the company receives a score of '1' because there is no clear evidence that its policy defines and addresses possible conflicts arising from government relationships or outside employment opportunities. It is also not clear that the company's policy addresses actual, potential and perceived conflicts of interest.</p>
Evidence
<p><b>[2] Code of Ethics (Document)</b>            Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>            [p.1] TATRA TRUCKS' Code of Ethics This Code of Ethics is mandatory for all employees in either technical or worker professions, management of all companies as well as the management of the company and members of the Executive Board. Some of its contents are applicable to specific employee companys (e.g. sales specialists) or involve entities outside of TATRA TRUCKS (e.g. contractors and dealers) in the Czech Republic as well as abroad where TATRA TRUCKS is active.</p> <p>[...]</p> <p>TATRA TRUCKS forbids any behaviour involving a conflict of interests. Therefore, TATRA TRUCKS's employees must not participate in contractor and business relations with TATRA TRUCKS on the side of contractors or customers and must not have any personal profit from these relations coming from subjects other than TATRA TRUCKS. The risk of conflict of interests coming from e.g. involvement of family members or friends in companies that are either contractors or customers of the Company or their holding shares of these companies should be reported to TATRA TRUCKS's HR manager.</p> <p><b>[1] Anti-Corruption Programme (Webpage)</b>            Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>            TATRA TRUCKS' CODE OF ETHICS</p> <p>One of the key components of the TATRA TRUCKS' anti-corruption program is the Code of Ethics for the holding's employees who are obliged to adhere to it. Some of its provisions also concern TATRA TRUCKS' partners, e.g. sales representatives and dealers. The TATRA TRUCKS' Code of Ethics is based on requirements of the UK-based Transparency International. The Codex includes:</p> <p>the ban of corruption            the ban of conflicts of interest            reporting of corruptive of unethical behaviour            special duties of sales departments concerning fulfilling the anti-corruption program            rules of sponsorship and donations to political parties and movements            the commitment to spread the anti-corruption program beyond TATRA TRUCKS</p> <p>TATRA TRUCKS' SPONSORING RULES</p> <p>[...]</p>

The main rule in TATRA TRUCKS' sponsoring activities is that it must not be tied to any specific business opportunities in public nor private sector. Similarly, a sponsoring under the circumstances of conflict of interests is also forbidden. Sponsoring activities of TATRA TRUCKS are usually publicized either by a press release or by posting the information on the company's website or an internal magazine Tatrovak.

<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company has procedures in place to identify, declare and manage conflicts of interest. The company indicates that employees who become aware of a conflict must report this information to the HR manager, however the company does not provide any further details on this process or any oversight mechanisms.
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>                  [p.1] TATRA TRUCKS forbids any behaviour involving a conflict of interests. Therefore, TATRA TRUCKS's employees must not participate in contractor and business relations with TATRA TRUCKS on the side of contractors or customers and must not have any personal profit from these relations coming from subjects other than TATRA TRUCKS. The risk of conflict of interests coming from e.g. involvement of family members or friends in companies that are either contractors or customers of the Company or their holding shares of these companies should be reported to TATRA TRUCKS's HR manager.</p>

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



<b>Question</b>
<b>4.4. Does the company report details of the contracted services of serving politicians to the company?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes details of any contracted services of serving politicians.
<b>Evidence</b>
No evidence found.

## 5. Customer Engagement

### 5.1 Contributions, Donations and Sponsorships

<b>Question</b>
<b>5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>There is evidence that the company has a policy on corporate political contributions, which states that such donations to political parties or movements are permitted. The company indicates that such support must not be connected to any public sector opportunity, and states that any donations must be transparent.</p> <p>The company receives a score of '0' because there is evidence to indicate that it does not prohibit political contributions.</p>
<b>Evidence</b>
<p><b>[1] Anti-Corruption Programme (Webpage)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>                  TATRA TRUCKS' CODE OF ETHICS</p> <p>One of the key components of the TATRA TRUCKS' anti-corruption program is the Code of Ethics for the holding's employees who are obliged to adhere to it. Some of its provisions also concern TATRA TRUCKS' partners, e.g. sales representatives and dealers. The TATRA TRUCKS' Code of Ethics is based on requirements of the UK-based Transparency International. The Codex includes:</p> <p>the ban of corruption</p> <p>the ban of conflicts of interest</p> <p>[...]</p> <p>rules of sponsorship and donations to political parties and movements</p> <p>[...]</p> <p>Support of Political Parties and Movements</p> <p>The support of political parties and movements by TATRA TRUCKS must be transparent. This support must not be connected to any kind of business opportunity in public sector. TATRA TRUCKS strictly adheres to all legal obligations concerning any potential support of political parties.</p> <p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>                  [p.2] It is forbidden to provide sponsorship which is directly tied to any business opportunity in public or private sector. Similarly, this applies to support of political parties and movements. The purpose of TATRA TRUCKS's sponsoring activities is to support education (especially technical), sports, culture or non-profit organizations, mainly in regions where TATRA TRUCKS's companies reside.</p>

<b>Question</b>
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?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the company publishes any details of its political contributions.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>There is some evidence that the company has a policy covering both sponsorships and charitable donations.</p> <p>However, the company receives a score of '0' because there is no evidence that provides specific information on the criteria or controls in place to ensure that donations are not used as vehicles for bribery and corruption. For example, there is no evidence that its controls include a measures for senior sign off on donations or due diligence on recipients. There is also no evidence that the company publishes any information on its donations made in the most recently reported financial year.</p>
<b>Evidence</b>
<p><b>[1] Anti-Corruption Programme (Webpage)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>                  The TATRA TRUCKS' Code of Ethics is based on requirements of the UK-based Transparency International. The Codex includes:</p> <ul style="list-style-type: none"> <li>• the ban of corruption</li> <li>• the ban of conflicts of interest</li> <li>• reporting of corruptive of unethical behaviour</li> <li>• special duties of sales departments concerning fulfilling the anti-corruption program</li> <li>• rules of sponsorship and donations to political parties and movements</li> <li>• the commitment to spread the anti-corruption program beyond TATRA TRUCKS</li> </ul> <p>TATRA TRUCKS' SPONSORING RULES</p> <p>TATRA TRUCKS as a socially responsible company in the field of defence industry logically supports mainly non-profit activities in the regions of the member companies' residence. This can mean activities such as sport, cultural, educational or other events. Especially significant are educational events that support development of technical disciplines which bring major contributions to the national wealth of the Czech Republic, boost the national export potential and are chronically battling a lack of promising students.</p> <p>The main rule in TATRA TRUCKS' sponsoring activities is that it must not be tied to any specific business opportunities in public nor private sector. Similarly, a sponsoring under the circumstances of conflict of interests is also forbidden. Sponsoring activities of TATRA TRUCKS are usually publicized either by a press release or by posting the information on the company's website or an internal magazine Tatrovak.</p> <p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>                  [p.2] It is forbidden to provide sponsorship which is directly tied to any business opportunity in public or private sector. Similarly, this applies to support of political parties and movements. The purpose of TATRA TRUCKS's sponsoring activities is to support education (especially technical), sports, culture or non-profit organizations, mainly in regions where TATRA TRUCKS's companies reside.</p>

## 5.2 Lobbying

<b>Question</b>
5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?
<b>Score</b>
0
<b>Comments</b>
There is no publicly available evidence that the company has a policy or procedure on lobbying.
<b>Evidence</b>
No evidence found.

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


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


### 5.3 Gifts and Hospitality

<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company has a policy and procedure on the giving and receipt of gifts and hospitality. The company states that any gifts offered must be proportionate in value and indicates that employees in high risk positions, such as sales, must not accept gifts. There is evidence that employees must report gifts to a superior in such cases.</p> <p>The company receives a score of '1' because it does not provide any information on further controls in place to ensure such expenses are not used as vehicles for bribery and corruption. For example, there is no evidence that it specifies financial or proportional limits or different approval procedures for different types of promotional expenses, nor does it address the risks associated with gifts and hospitality given to/received from domestic or foreign public officials. In addition, 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>
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>                  [p.2] TATRA TRUCKS is providing standard services for their partners in the context of building acceptable professional relationships including the possibility of covering the costs of accommodation during the partners' stay and extending gifts and courtesies. However, it is forbidden to provide a disproportionately luxurious accommodation, unethical and expensive entertainment of give gifts with a clearly unreasonable value. These actions are considered potentially corruptive in relation to TATRA TRUCKS partners. Similarly, managers and employees of TATRA TRUCKS member companies, especially in their sales departments, are forbidden to accept such inappropriate services or luxurious gifts. In case such offers are extended by a partner, the employee is required to report this to their superior.</p> <p><b>[1] Anti-Corruption Programme (Webpage)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/GIFTS%20AND%20HOSPITALITY">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/GIFTS AND HOSPITALITY</a>                  GIFTS AND HOSPITALITY</p> <p>TATRA TRUCKS is providing standard services for their partners in the context of building acceptable professional relationships including the possibility of covering the costs of accommodation during the partners' stay and extending gifts and courtesies.</p> <p>However, it is forbidden to provide a disproportionately luxurious accommodation, unethical and expensive entertainment of give gifts with a clearly unreasonable value. These actions are considered potentially corruptive in relation to TATRA TRUCKS' partners. Similarly, managers and employees of TATRA TRUCKS member companies, especially in their sales departments, are forbidden to accept such inappropriate services or luxurious gifts. In case such offers are extended by a partner, the employee is required to report</p>



## 6. Supply Chain Management

Question																		
<p><b>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?</b></p>																		
Score																		
1																		
Comments																		
<p>There is some evidence to suggest 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' because it is not clear that the procurement department is the main body responsible for oversight of the company's supplier base. There is also no evidence that the company assures itself of the procurement department's involvement at least every three years.</p>																		
Evidence																		
<p><b>[4] Procurement and Suppliers (Webpage)</b>                      Accessed 14/04/2020  <a href="https://www.tatratrucks.com/your-tatra-partner/selling-and-procurement/procurement-and-suppliers/">https://www.tatratrucks.com/your-tatra-partner/selling-and-procurement/procurement-and-suppliers/</a>                      TATRA TRUCKS a.s. wants to be a transparent partner and so you can find all the information on the course of selection procedures declared by TATRA TRUCKS a.s. on this page, including the winner and the final bid.</p> <p>Open selection procedures                      Contacts                      Dalibor Ondruch, Purchasing Director, tel.: +420 556 494 382                      Martin Gwozdz, Operational Purchasing Dept. Manager, tel.: 556 494 084                      Pavel Boháč, Strategic Sourcing Dept. Manager, tel.: +420 556 492 024</p> <p>Files for download</p> <ul style="list-style-type: none"> <li>General Terms of Commerce [713,34 kB]</li> </ul> <p><b>[6] Supplier Questionnaire (Document)</b>                      Accessed 15/04/2020  <a href="https://www.tatra.cz/underwood/download/files/rfi.xls">https://www.tatra.cz/underwood/download/files/rfi.xls</a></p> <div style="text-align: center;"> <p><b>REQUEST FOR INFORMATION</b>                              požadavak na informace</p>  </div> <table border="1"> <tbody> <tr> <td><b>Supplier Name</b> Název dodavatele</td> <td></td> </tr> <tr> <td><b>Location</b> Poloha</td> <td></td> </tr> <tr> <td><b>Company contact (name, phone, email)</b> Firemní kontakt (osoba, telefon, email)</td> <td></td> </tr> <tr> <td><b>Website</b> Webovky</td> <td></td> </tr> <tr> <td><b>Brief company description</b> Stručný popis firmy</td> <td></td> </tr> <tr> <td><b>Annual Turnover</b> Roční Obrat</td> <td></td> </tr> <tr> <td><b>Company ownership structure</b> Vlastnická struktura firmy</td> <td></td> </tr> <tr> <td><b>How long company been in existence</b> Délka působení firmy</td> <td></td> </tr> <tr> <td><b>No. of Employees (office/shopfloor)</b></td> <td></td> </tr> </tbody> </table> <p>[p.1]</p> <p>[Document lists further questions]</p>	<b>Supplier Name</b> Název dodavatele		<b>Location</b> Poloha		<b>Company contact (name, phone, email)</b> Firemní kontakt (osoba, telefon, email)		<b>Website</b> Webovky		<b>Brief company description</b> Stručný popis firmy		<b>Annual Turnover</b> Roční Obrat		<b>Company ownership structure</b> Vlastnická struktura firmy		<b>How long company been in existence</b> Délka působení firmy		<b>No. of Employees (office/shopfloor)</b>	
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<b>Question</b>																		
<b>6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers?</b>																		
<b>Score</b>																		
<b>1</b>																		
<b>Comments</b>																		
<p>There is evidence that the company conducts due diligence on all third parties, including suppliers. The company states that it is willing to review and/or terminate a supplier relationship if a red flag highlighted during due diligence cannot be mitigated.</p> <p>However, the company receives a score of ‘1’ because there is no evidence that its due diligence includes checks on ultimate beneficial ownership. In addition, there is no evidence that highest risk suppliers are subject to enhanced due diligence, and it is not clear how frequently it conducts such checks. There is no evidence that this takes place at least every two years or when there is a change in the business relationship.</p>																		
<b>Evidence</b>																		
<p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>                  [p.2] TATRA TRUCKS sales personnel and its dealers are obliged to take corruption risks into account while assessing business opportunities and negotiating individual contracts. The risks are defined predominantly by whether the customer is a private or public entity, what is the customer’s country position in the global anti-corruption board of Transparency International and what is the means of submission of the contract (competition or direct submission).</p> <p>TATRA TRUCKS sales personnel are obliged to verify by means of publicly available sources (media and internet), whether there are confirmed cases of corruption involving external partners of TATRA TRUCKS. They are furthermore required to take these factors into account while making business decisions, including the possibility of not establishing or terminating relations with partners who have a history of corruption</p> <p><b>[6] Supplier Questionnaire (Document)</b>                  Accessed 15/04/2020  <a href="https://www.tatra.cz/underwood/download/files/rfi.xls">https://www.tatra.cz/underwood/download/files/rfi.xls</a>                  [p.1]</p> <div style="text-align: center;"> <p><b>REQUEST FOR INFORMATION</b></p> <p>požadavak na informace</p>  </div> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #f4a460;"><b>Supplier Name</b> <small>Název dodavatele</small></td> <td></td> </tr> <tr> <td style="background-color: #f4a460;"><b>Location</b> <small>Poloha</small></td> <td></td> </tr> <tr> <td style="background-color: #f4a460;"><b>Company contact (name, phone, email)</b> <small>Firemní kontakt (osoba, telefon, email)</small></td> <td></td> </tr> <tr> <td style="background-color: #f4a460;"><b>Website</b> <small>Webovky</small></td> <td></td> </tr> <tr> <td style="background-color: #f4a460;"><b>Brief company description</b> <small>Stručný popis firmy</small></td> <td></td> </tr> <tr> <td style="background-color: #f4a460;"><b>Annual Turnover</b> <small>Roční Obrat</small></td> <td></td> </tr> <tr> <td style="background-color: #f4a460;"><b>Company ownership structure</b> <small>Vlastnická struktura firmy</small></td> <td></td> </tr> <tr> <td style="background-color: #f4a460;"><b>How long company been in existence</b> <small>Délka působení firmy</small></td> <td></td> </tr> <tr> <td style="background-color: #f4a460;"><b>No. of Employees (office/shopfloor)</b></td> <td></td> </tr> </table> <p>[Document lists further questions]</p>	<b>Supplier Name</b> <small>Název dodavatele</small>		<b>Location</b> <small>Poloha</small>		<b>Company contact (name, phone, email)</b> <small>Firemní kontakt (osoba, telefon, email)</small>		<b>Website</b> <small>Webovky</small>		<b>Brief company description</b> <small>Stručný popis firmy</small>		<b>Annual Turnover</b> <small>Roční Obrat</small>		<b>Company ownership structure</b> <small>Vlastnická struktura firmy</small>		<b>How long company been in existence</b> <small>Délka působení firmy</small>		<b>No. of Employees (office/shopfloor)</b>	
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<b>Question</b>
<b>6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company ensures that its suppliers have anti-bribery and corruption policies in place that meet a high standard. The company indicates that external partners must be familiar with its anti-corruption programme, but it is not clear that suppliers themselves are required to establish and implement anti-corruption procedures within their own organisations.
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>                  [p.2] Employees of TATRA TRUCKS, especially in sales and marketing departments, are obliged to familiarize external partners, e.g. dealers and contractors, with TATRA TRUCKS's anti-corruption program or at least those its parts which are applicable to external partners.</p> <p><b>[1] Anti-Corruption Programme (Webpage)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>                  TATRA TRUCKS' CODE OF ETHICS</p> <p>One of the key components of the TATRA TRUCKS' anti-corruption program is the Code of Ethics for the holding's employees who are obliged to adhere to it. Some of its provisions also concern TATRA TRUCKS' partners, e.g. sales representatives and dealers. The TATRA TRUCKS' Code of Ethics is based on requirements of the UK-based Transparency International. The Codex includes:</p> <p>[...]</p> <ul style="list-style-type: none"> <li>the commitment to spread the anti-corruption program beyond TATRA TRUCKS</li> </ul>

<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available 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.
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>                  [p.2] Employees of TATRA TRUCKS, especially in sales and marketing departments, are obliged to familiarize external partners, e.g. dealers and contractors, with TATRA TRUCKS's anti-corruption program or at least those its parts which are applicable to external partners.</p> <p><b>[1] Anti-Corruption Programme (Webpage)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>                  TATRA TRUCKS' CODE OF ETHICS</p> <p>One of the key components of the TATRA TRUCKS' anti-corruption program is the Code of Ethics for the holding's employees who are obliged to adhere to it. Some of its provisions also concern TATRA TRUCKS' partners, e.g. sales representatives and dealers. The TATRA TRUCKS' Code of Ethics is based on requirements of the UK-based Transparency International. The Codex includes:</p> <p>[...]</p> <ul style="list-style-type: none"> <li>the commitment to spread the anti-corruption program beyond TATRA TRUCKS</li> </ul>

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

## 7. Agents, Intermediaries and Joint Ventures

### 7.1 Agents and Intermediaries

<b>Question</b>
7.1.1 Does the company have a clear policy on the use of agents?
<b>Score</b>
0
<b>Comments</b>
Based on publicly available information, there is no evidence that the company publishes a policy on the use of agents.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>There is some evidence that the company has procedures in place to conduct risk-based anti-bribery and corruption due diligence on its external partners, however there is no clear evidence to indicate that this includes agents. In addition, there is no evidence that agents and highest risk intermediaries are subject to enhanced due diligence, nor that due diligence is repeated every two years and/or when there is a significant change in the business relationship.</p>
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>                  [p.2] TATRA TRUCKS sales personnel and its dealers are obliged to take corruption risks into account while assessing business opportunities and negotiating individual contracts. The risks are defined predominantly by whether the customer is a private or public entity, what is the customer’s country position in the global anti-corruption board of Transparency International and what is the means of submission of the contract (competition or direct submission).</p> <p>TATRA TRUCKS sales personnel are obliged to verify by means of publicly available sources (media and internet), whether there are confirmed cases of corruption involving external partners of TATRA TRUCKS. They are furthermore required to take these factors into account while making business decisions, including the possibility of not establishing or terminating relations with partners who have a history of corruption.</p>

<b>Question</b>
<b>7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company aims to establish the ultimate beneficial ownership of its agents and intermediaries as part of its due diligence procedure.
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a></p> <p>[p.2] TATRA TRUCKS sales personnel and its dealers are obliged to take corruption risks into account while assessing business opportunities and negotiating individual contracts. The risks are defined predominantly by whether the customer is a private or public entity, what is the customer’s country position in the global anti-corruption board of Transparency International and what is the means of submission of the contract (competition or direct submission).</p> <p>TATRA TRUCKS sales personnel are obliged to verify by means of publicly available sources (media and internet), whether there are confirmed cases of corruption involving external partners of TATRA TRUCKS. They are furthermore required to take these factors into account while making business decisions, including the possibility of not establishing or terminating relations with partners who have a history of corruption.</p>



<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is some evidence that the company’s Code of Ethics applies to sales representatives; however there is no clear evidence that this includes agents and intermediaries, nor is it clear that the company includes anti-bribery and corruption clauses in its contracts with these individuals or entities.
<b>Evidence</b>
<p><b>[1] Anti-Corruption Programme (Webpage)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>                  TATRA TRUCKS’ CODE OF ETHICS</p> <p>One of the key components of the TATRA TRUCKS’ anti-corruption program is the Code of Ethics for the holding’s employees who are obliged to adhere to it. Some of its provisions also concern TATRA TRUCKS’ partners, e.g. sales representatives and dealers. The TATRA TRUCKS’ Code of Ethics is based on requirements of the UK-based Transparency International. The Codex includes:</p> <ul style="list-style-type: none"> <li>• the ban of corruption</li> <li>• the ban of conflicts of interest</li> <li>• reporting of corruptive of unethical behaviour</li> <li>• special duties of sales departments concerning fulfilling the anti-corruption program</li> <li>• rules of sponsorship and donations to political parties and movements</li> <li>• the commitment to spread the anti-corruption program beyond TATRA TRUCKS</li> </ul> <p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>                  [p.1] TATRA TRUCKS’Code of Ethics</p> <p>This Code of Ethics is mandatory for all employees in either technical or worker professions, management of all companies as well as the management of the company and members of the Executive Board. Some of its contents are applicable to specific employee companys (e.g. sales specialists) or involve entities outside of TATRA TRUCKS (e.g. contractors and dealers) in the Czech Republic as well as abroad where TATRA TRUCKS is active.</p> <p>TATRA TRUCKS requires its employees and partners to adhere to law as well as highest ethical standards based on honest actions, trust, transparency, openness, integrity and responsibility.</p> <p>TATRA TRUCKS has joined Transparency International’s anti-corruption program for the field of Defence technology and its employees are required to familiarize with requirements of this program and act in its spirit.</p>

<b>Question</b>
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?
<b>Score</b>
0
<b>Comments</b>
There is no publicly available evidence that the company considers incentive structures as a risk factor in agent behavior.
<b>Evidence</b>
No evidence found.

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

<b>Question</b>
<b>7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
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.
<b>Evidence</b>
No evidence found.

## 7.2 Joint Ventures

<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company has formal procedures in place to conduct anti-bribery and corruption due diligence on its joint venture partners. The company indicates that it conducts checks on its external partners, however there is no clear evidence to suggest that this includes joint ventures.
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a></p> <p>[p.2] TATRA TRUCKS sales personnel and its dealers are obliged to take corruption risks into account while assessing business opportunities and negotiating individual contracts. The risks are defined predominantly by whether the customer is a private or public entity, what is the customer’s country position in the global anti-corruption board of Transparency International and what is the means of submission of the contract (competition or direct submission).</p> <p>TATRA TRUCKS sales personnel are obliged to verify by means of publicly available sources (media and internet), whether there are confirmed cases of corruption involving external partners of TATRA TRUCKS. They are furthermore required to take these factors into account while making business decisions, including the possibility of not establishing or terminating relations with partners who have a history of corruption.</p>

<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company commits to establishing or implementing anti-bribery and corruption policies or procedures in its joint ventures. In addition, there is no evidence that the company requires anti-bribery and corruption clauses in its contracts with joint venture partners.
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>                  [p.1] TATRA TRUCKS requires its employees and partners to adhere to law as well as highest ethical standards based on honest actions, trust, transparency, openness, integrity and responsibility.</p> <p><b>[1] Anti-Corruption Programme (Webpage)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>                  TATRA TRUCKS' CODE OF ETHICS</p> <p>[...]</p> <p>The TATRA TRUCKS' Code of Ethics is based on requirements of the UK-based Transparency International.</p> <p>The Codex includes:</p> <p>[...]</p> <p>the commitment to spread the anti-corruption program beyond TATRA TRUCKS</p>

<b>Question</b>
7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?
<b>Score</b>
0
<b>Comments</b>
There is no publicly available evidence that the company commits to take an active role in preventing bribery and corruption in all of its joint ventures.
<b>Evidence</b>
<p><b>[1] Anti-Corruption Programme (Webpage)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>                  TATRA TRUCKS' CODE OF ETHICS</p> <p>[...]</p> <p>The TATRA TRUCKS' Code of Ethics is based on requirements of the UK-based Transparency International.</p> <p>The Codex includes:</p> <p>[...]</p> <p>the commitment to spread the anti-corruption program beyond TATRA TRUCKS</p>

## 8. Offsets

<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>There is some evidence that the company recognises the corruption risks associated with offset contracting. However, there is no evidence that the company has a dedicated body, department or team that is responsible for monitoring the company's offset activities, nor does it indicate that employees within this department receive dedicated training on the possible corruption risks associated with offsets.</p>
<b>Evidence</b>
<p><b>[1] Anti-Corruption Programme (Webpage)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>                  TATRA TRUCKS' INVOLVEMENT IN OFFSET PROGRAMS</p> <p>While Czech legislation, in adherence to the European law, does not further enable Czech companies to participate in offset programs as a part of public contracts of Czech government and ministries, they can be required to fulfil offset programs when working in foreign environments. A typical requirement, even in democratic countries, can be the partial transfer of production, which can be perceived as a so-called direct offset. TATRA TRUCKS in cooperation with their foreign partners carries out the offset programs in strict accordance with national legislation, usually in order to fulfil the customer's need to gain the capability of partial production and maintenance of the product. TATRA TRUCKS refuses and does not participate in offset programs whose aim is to submit contracts not coherent with their activities, which include a risk of corruption and could be abused in order to commit corruption. TATRA TRUCKS informs about the activities which can be perceived as direct offsets by standard means while communicating information about the original contract (the production transfer is possible only with the more significant and publicly controllable projects).</p>



<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence on its offset obligations.
<b>Evidence</b>
<p><b>[1] Anti-Corruption Programme (Webpage)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>                  TATRA TRUCKS' INVOLVEMENT IN OFFSET PROGRAMS</p> <p>While Czech legislation, in adherence to the European law, does not further enable Czech companies to participate in offset programs as a part of public contracts of Czech government and ministries, they can be required to fulfil offset programs when working in foreign environments. A typical requirement, even in democratic countries, can be the partial transfer of production, which can be perceived as a so-called direct offset. TATRA TRUCKS in cooperation with their foreign partners carries out the offset programs in strict accordance with national legislation, usually in order to fulfil the customer's need to gain the capability of partial production and maintenance of the product. TATRA TRUCKS refuses and does not participate in offset programs whose aim is to submit contracts not coherent with their activities, which include a risk of corruption and could be abused in order to commit corruption. TATRA TRUCKS informs about the activities which can be perceived as direct offsets by standard means while communicating information about the original contract (the production transfer is possible only with the more significant and publicly controllable projects).</p>

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

<b>Question</b>
<b>8.4 Does the company publish details about the beneficiaries of its indirect offset projects?</b>
<b>Score</b>
N/A
<b>Comments</b>
The company publishes a statement to indicate that it does not participate in indirect offset projects as a matter of policy, due to the possible corruption risks associated with such activities. The company is therefore exempt from scoring on this question.
<b>Evidence</b>
<p><b>[1] Anti-Corruption Programme (Webpage)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>                  TATRA TRUCKS' INVOLVEMENT IN OFFSET PROGRAMS</p> <p>[...] TATRA TRUCKS refuses and does not participate in offset programs whose aim is to submit contracts not coherent with their activities, which include a risk of corruption and could be abused in order to commit corruption. TATRA TRUCKS informs about the activities which can be perceived as direct offsets by standard means while communicating information about the original contract (the production transfer is possible only with the more significant and publicly controllable projects).</p>

## 9. High Risk Markets

<b>Question</b>
<b>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?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is some evidence that the company acknowledges the corruption risks associated with operating in different markets, however there is no clear evidence that the company has risk assessment procedures in place to identify such risks. There is also no evidence that the results of risk assessments are used to inform the company's operations in high risk markets.
<b>Evidence</b>
<p><b>[2] Code of Ethics (Document)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>                  [p.2] TATRA TRUCKS sales personnel and its dealers are obliged to take corruption risks into account while assessing business opportunities and negotiating individual contracts. The risks are defined predominantly by whether the customer is a private or public entity, what is the customer's country position in the global anti-corruption board of Transparency International and what is the means of submission of the contract (competition or direct submission).</p>

<b>Question</b>
<b>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)?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>There is no evidence that the company provides a list of its fully consolidated subsidiaries and non-fully consolidated holdings. The company provides information on one subsidiary, but it is not clear whether this represents all of the company's holdings, nor is there evidence that the company provides further details such as its percentage ownership or country of incorporation/operation for the entity.</p>
<b>Evidence</b>
<p><b>[3] Company Profile (Webpage)</b>  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/company-profile/">https://www.tatratrucks.com/about-the-company/tatra-today/company-profile/</a>  TATRA TRUCKS a.s. has a subsidiary - TATRA METALURGIE a.s.. The main production program covers heavy-duty off-road vehicles and trucks for combined on/off road transport, which are constantly improved to meet increasing customer requirements. A high level of human potential represents a significant advantage of TATRA TRUCKS a.s., not only in R&amp;D but also in terms of the production capacity.</p> <p><b>[5] Subsidiary Company (Webpage)</b>  Accessed 14/04/2020  <a href="https://www.tatra.cz/o-spolecnosti/tatra-trucks-dnes/tatra-metalurgie-a-s/">https://www.tatra.cz/o-spolecnosti/tatra-trucks-dnes/tatra-metalurgie-a-s/</a>  Pro společnost TATRA TRUCKS je dceřiná společnost TATRA METALURGIE dodavatelem některých výrobků nebo služeb. Historicky byla její součástí, dnes tvoří samostatnou obchodní společnost s širokým spektrem vlastních zákazníků.</p> <p>TATRA METALURGIE a.s.</p> <p>je významným českým výrobcem odlitků a výkovků, které jsou dodávány pro strojírenské aplikace v mnoha evropských zemích.</p> <p>Obchodní činnost společnosti navazuje na dlouhodobé obchodní vztahy se zákazníky slévárny (Tafonco a.s.) a kovářny (Taforge a.s.) s cílem jejich dalšího posílení a rozvoje.</p> <p>Odlitky a výkovky směřují do automobilového průmyslu, železničního průmyslu, k výrobcům zemědělských strojů, stavebních strojů a manipulační techniky. Své uplatnění naleznou i v oblasti všeobecného strojírenství i speciálních aplikací.</p> <p>Komerční slévárna dlouhodobě spolupracuje s firmami z automobilového, stavebního a strojírenského průmyslu včetně dodávek pro zemědělskou techniku, traktory a vysokozdvížné vozíky.</p> <p><b>Translation:</b></p> <p>For TATRA TRUCKS, the TATRA METALURGIE subsidiary is the supplier of certain products or services. Historically, it was a part of the company, today it is an independent trading company with a wide range of its own customers.</p> <p>TATRA METALURGIE a.s.</p> <p>is a leading Czech manufacturer of castings and forgings, which are supplied for engineering applications in many European countries.</p> <p>The business activity of the company follows long-term business relationships with customers of the foundry (Tafonco as) and the forge (Taforge as) with the aim of further strengthening and development.</p>

Castings and forgings are directed to the automotive industry, railway industry, to manufacturers of agricultural machinery, construction machinery and handling equipment. They can also be used in general engineering and special applications.

Commercial foundry has long been cooperating with companies from the automotive, construction and engineering industries, including supplies for agricultural machinery, tractors and forklifts.

<b>Question</b>
<b>9.3 Does the company disclose its beneficial ownership and control structure?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>There is no evidence that the company publishes information about its beneficial ownership or control structure on its website. There is no evidence that the company states that no individual owns 25% or more of shares or voting rights. In addition, although some information about the company appears to be available via the global beneficial ownership register <a href="https://register.openownership.org">openownership.org</a>, there is no evidence that this data includes percentage ownership information.</p>
<b>Evidence</b>
<p><b>[7] Press Release (Webpage)</b>                  Accessed 15/04/2020  <a href="https://www.tatratrucks.com/about-the-company/press-and-media/news/tatra-trucks-won-the-prestigious-award-traditional-czech-brand-1/">https://www.tatratrucks.com/about-the-company/press-and-media/news/tatra-trucks-won-the-prestigious-award-traditional-czech-brand-1/</a>                  On the festive evening, Radomír Smolka, Vice-Chairman of the Board of Directors and Technical Director of TATRA TRUCKS received the Traditional Czech Brand Award 2017 for TATRA TRUCKS, owned by entrepreneurs Jaroslav Strnad and René Matera. "We really appreciate this award, especially when we won it for the second time in a row. It is evidence that the public perceives our society and the TATRA brand as part of the Czech identity and one of the symbols of the Czech industry. This is binding but also inspiration for the future," said Radomír Smolka.</p> <p><b>[9] Press Release on 2016 Results (Webpage)</b>                  Accessed 15/04/2020  <a href="https://www.tatratrucks.com/about-the-company/press-and-media/news/tatra-trucks-produced-1-326-vehicles-in-2016-production-has-grown-by-56-percent-year-on-year/">https://www.tatratrucks.com/about-the-company/press-and-media/news/tatra-trucks-produced-1-326-vehicles-in-2016-production-has-grown-by-56-percent-year-on-year/</a>                  Both owners of the truckmaker highly appreciate the company's results in 2016: Jaroslav Strnad and René Matera. Majority shareholder of TATRA TRUCKS Jaroslav Strnad says: "A big thanks from me and Rene Matera go not only to the entire management team of TATRA TRUCKS, but above all to the employees for all their efforts, especially in recent weeks and months."</p> <p><b>[8] Open Ownership Search Entry (Webpage)</b>                  Accessed 15/04/2020  <a href="https://register.openownership.org/entities/59c2266767e4ebf34034f707">https://register.openownership.org/entities/59c2266767e4ebf34034f707</a></p> <p><b>TATRA TRUCKS A.S.</b>                  Czech Republic <a href="#">Legal entity</a></p> <p>OPTIONS   Transliterate   Report incorrect data   View as graph   Download BODS json</p> <p><b>Beneficial owners of TATRA TRUCKS A.S.</b></p> <ul style="list-style-type: none"> <li><b>RENÉ MATERA</b> Czech (Born July 1963)                      Nad Školou, Stará Ves nad Ondřejnicí, 73923                      Started on 2017-04-20                      Interests unknown <a href="#">Details</a></li> <li><b>MICHAL STRNAD</b> Czech (Born August 1992)                      Tyršova, Slatiňany, 53821                      Started on 2018-03-02                      Interests unknown <a href="#">Details</a></li> <li><b>JAROSLAV STRNAD</b> Czech (Born June 1972)                      Tyršova, Slatiňany, 53821                      Started on 2017-04-20                      Interests unknown                      Ended on 2018-03-01 <a href="#">Details</a></li> </ul>

<b>Question</b>
<b>9.4 Does the company publish a percentage breakdown of its defence sales by customer?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is some evidence that the company publishes information on its main markets, however there is no evidence that it provides a percentage breakdown of its defence sales by customer.
<b>Evidence</b>
<p><b>[3] Company Profile (Webpage)</b>                  Accessed 14/04/2020  <a href="https://www.tatratrucks.com/about-the-company/tatra-today/company-profile/">https://www.tatratrucks.com/about-the-company/tatra-today/company-profile/</a>                  Traditionally, the Company's major business territories include Russia, the former CIS countries, Israel, India, the Arabian Peninsula, Australia and Europe. On the domestic market (Czech Republic, Slovakia), where customers are dominated by the Army of the Czech Republic, the Fire Rescue Service of the Czech Republic, the Armed Forces of the Slovak Republic from commercial customers, such as Revitrans as (formerly SD - Trucking) or Forests of the Slovak Republic.</p>



## 10. State-Owned Enterprises (SOEs)

<b>Question</b>
10.1 Does the SOE publish a breakdown of its shareholder voting rights?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
10.2 Are the SOE's commercial and public policy objectives publicly available?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
10.4 Is the SOE's audit committee composed of a majority of independent directors?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
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?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

## List of Evidence & Sources

No	Type (Webpage or Document)	Name	Download Date	Link
01	Webpage	Anti-Corruption Programme	14/04/2020	<a href="https://www.tatratrucks.com/about-the-company/tatra-today/et-link/">https://www.tatratrucks.com/about-the-company/tatra-today/et-link/</a>
02	Document	Code of Ethics	14/04/2020	<a href="https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf">https://www.tatratrucks.com/underwood/download/files/code_of_ethics_tt.pdf</a>
03	Webpage	Company Profile	14/04/2020	<a href="https://www.tatratrucks.com/about-the-company/tatra-today/company-profile/">https://www.tatratrucks.com/about-the-company/tatra-today/company-profile/</a>
04	Webpage	Procurement and Suppliers	14/04/2020	<a href="https://www.tatratrucks.com/your-tatra-partner/selling-and-procurement/procurement-and-suppliers/">https://www.tatratrucks.com/your-tatra-partner/selling-and-procurement/procurement-and-suppliers/</a>
05	Webpage	Subsidiary Company	14/04/2020	<a href="https://www.tatra.cz/o-spolocnosti/tatra-trucks-dnes/tatra-metalurgie-a-s/">https://www.tatra.cz/o-spolocnosti/tatra-trucks-dnes/tatra-metalurgie-a-s/</a>
06	Document	Supplier Questionnaire	15/04/2020	<a href="https://www.tatra.cz/underwood/download/files/rfi.xls">https://www.tatra.cz/underwood/download/files/rfi.xls</a>
07	Webpage	Press Release	15/04/2020	<a href="https://www.tatratrucks.com/about-the-company/press-and-media/news/tatra-trucks-won-the-prestigious-award-traditional-czech-brand-1/">https://www.tatratrucks.com/about-the-company/press-and-media/news/tatra-trucks-won-the-prestigious-award-traditional-czech-brand-1/</a>
08	Webpage	Open Ownership Search Entry	15/04/2020	<a href="https://register.openownership.org/entities/59c2266767e4ebf34034f707">https://register.openownership.org/entities/59c2266767e4ebf34034f707</a>
09	Webpage	Press Release on 2016 Results	15/04/2020	<a href="https://www.tatratrucks.com/about-the-company/press-and-media/news/tatra-trucks-produced-1-326-vehicles-in-2016-production-has-grown-by-56-percent-year-on-year/">https://www.tatratrucks.com/about-the-company/press-and-media/news/tatra-trucks-produced-1-326-vehicles-in-2016-production-has-grown-by-56-percent-year-on-year/</a>