



Gifts, Entertainment & Anti- Bribery Policy

Scope Group



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Scope Group

Start Date:	01/08/2023	Version: 2.0
Applies to:		Entities affected:
<input checked="" type="checkbox"/> Non- Covered Employees – as described in the Policy <input checked="" type="checkbox"/> Covered Employees – as described in the policy <input checked="" type="checkbox"/> Analytical Personnel – as described in the policy <input checked="" type="checkbox"/> Markets division employees - as described in the policy <input checked="" type="checkbox"/> Persons belonging to the administrative board or management bodies of Scope <input checked="" type="checkbox"/> any persons working under the supervision and direction of contractors, subcontractors and suppliers.		<input checked="" type="checkbox"/> Scope SE & Co. KGaA <input checked="" type="checkbox"/> Scope Ratings GmbH <input checked="" type="checkbox"/> Scope Ratings UK Ltd. <input checked="" type="checkbox"/> Scope Fund Analysis GmbH <input checked="" type="checkbox"/> Scope ESG Analysis GmbH <input checked="" type="checkbox"/> Scope Innovation Lab GmbH <input checked="" type="checkbox"/> All existing and coming subsidiaries and affiliates of the above
<input checked="" type="checkbox"/> This document and any future updates or changes are made available on Scope's Intranet. <input checked="" type="checkbox"/> This document and any future updates or changes are made available on Scope's website.		
<input checked="" type="checkbox"/> This document contains defined terms made available in the Defined Terms Glossary available on Scope's intranet and website.		

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1. Introduction

Scope SE & Co. KGaA and its subsidiaries including Scope CRAs – hereinafter also referred to as “Scope Group” or “Scope” – have implemented this Gifts, Entertainment and Anti-Bribery Policy.

2. Defined terms

Gifts: tangible goods, favours, services or any kind of gratification given without expectation of immediate return or reciprocity.

Entertainment: entertainment includes meals and cultural or sporting events attended with a customer or business partner. Entertainment includes all hospitality received including meals (e.g., working lunches and breakfasts), drinks and paid-for outings of all kinds. .

CRA Compliance: the Compliance department of Scope CRAs which is responsible for all regulatory and Compliance matters arising under the CRA Regulation with respect to the business activities of Scope CRAs.

Group Compliance: the department of Scope Group responsible for overseeing and promoting adherence to both internal policies and procedures as well as external regulatory requirements and standards with respect to business activities of Scope Group, separate from the specific remit of CRA Compliance.

Bribery: offering or giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

Public Officials/ Sensitive Counterparts: an individual who holds a legislative, administrative, or judicial position of any kind, exercises a public function for or on behalf of a country or territory. An officer or employee of a government, public department or public international organisation. Includes employees of state-owned enterprises and other government funded or owned entities.

Scope Group: Scope Group means Scope SE & Co. KGaA and its subsidiaries.

3. Gifts and Entertainment Policy

3.1 Introduction

The aim of this Policy is to set the principles and framework related to the soliciting, giving or receiving of Gifts and Entertainment to ensure compliance with legal requirements and with our core values of transparency, quality and consistency in our business operations.

Restrictions imposed by this Policy do not encompass items of promotional or marketing character that are publicly available and not specifically related to services rendered by Scope.

Giving or accepting cash or cash-equivalent gifts, including but not limited to gift cards, vouchers or any other item that can be readily converted into cash are strictly prohibited.

3.2 Non-Covered Employees

Non – Covered Employees and Family Members may give or receive Gifts or Entertainment to or from a Client or business partner only if the following general requirements are met:

- a. The value of Gift or Entertainment must be reasonable and not exceed the cap defined Scope’s Gifts and Entertainment Procedures.
- b. The Gift or Entertainment must comply with applicable laws and the Gift and Entertainment Procedure;
- c. The Gift or Entertainment must not reasonably be interpreted as an attempt to obtain or retain an improper business advantage.
- d. The Gift or Entertainment must be in good faith and must directly relate to a legitimate business purpose.
- e. If the Gift or Entertainment is given by a non - covered employee, it must be supported by receipts and must be properly documented and disclosed.



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3.3 Covered Employees

It is forbidden for Covered Employees and Family Members to solicit, give or accept any gifts, favours, services or any kind of financial gratification or Entertainment from rated entities and/or originator, arranger, sponsor, servicer or any other third party that interacts with Scope CRAs on behalf (or for the benefit of) of a rated entity related parties that are not in line with the requirements of Scope's Gifts and Entertainment Policy and Procedure.

Notwithstanding the foregoing, Covered Employees may only solicit, give or accept minor items of a gift character received within the framework of a business interaction, provided that the following general requirements are met:

- a. The value of Gift or Entertainment must be reasonable and not exceed the cap defined Scope's Gifts and Entertainment Procedures. Should the value of such Gift or Entertainment exceed aforementioned cap, pre-approval from CRA Compliance must be sought;
- b. The Gift or Entertainment must comply with applicable laws and the Gift and Entertainment Procedure;
- c. The Gift or Entertainment must not reasonably be interpreted as an attempt to obtain or retain an improper business advantage.
- d. The Gift or Entertainment must be in good faith and must directly relate to a legitimate business purpose.
- e. If the Gift or Entertainment is given by an Covered Employee, it must be supported by receipts and must be properly documented and disclosed.

See related document: "Outside Business Interest and other COI policy and procedure".

3.4 Analytical Personnel

For Analytical Personnel it is forbidden to solicit, give, or accept any Gifts or Entertainment from a rated entity and/or originator, arranger, sponsor, servicer or any other third party that interacts with Scope CRAs on behalf of a rated entity, regardless of their value.

An exception to this only applies to incidental Gifts of minor value as further defined in the Gifts and Entertainment Procedures. If necessary, Employees should consult their managers and/or CRA Compliance.

Analytical Personnel may accept invitations to professional conferences or seminars regardless of any value limitations, subject to the approval of CRA Compliance and their line manager, provided that the conference or seminar is:

- financed by Scope CRA (i.e., it is not a Gift or an Entertainment),
- open to a broad range of attendees and
- not funded or sponsored by an entity that is rated by Scope CRAs or its related third party.

3.5 Sales and Business Development Employees

Employees who are members of Sales and Business Development departments may accept invitations to professional conferences or seminars regardless of any value limitations, subject to the approval by their line manager, provided that the conference or seminar is:

- open to a broad range of attendees and
- not funded or sponsored by an entity that is rated by Scope CRAs or its related third party.

Markets division employees must follow the steps described in the Gifts, Entertainment Procedure to request approval.

This exception only applies to the attendance fee and does not include travelling or accommodation cost, which remain subject to the value limitations under the Gifts and Entertainment Procedure.

4. Notification to Compliance

In case that an Employee has accepted a Gift or Entertainment, she/he is obliged to notify immediately to her/his manager and Group Compliance (Non-Covered Employees) or CRA Compliance (Covered Employees, Analytical Personnel, Sales and Business Development Employees) correspondingly, according to the Gift and Entertainment Procedure. Compliance will assess whether the Gift or Entertainment may constitute or be perceived as conflict of interest and approve or reject accordingly.

5. Pre - approvals

Compliance must pre-approve any Gift or Entertainment that exceeds the caps defined in the Gifts and Entertainment Procedure, based on the applicable law and regulations, the counterparty (and the potential risk) and the social and industry conventions.

Analytical Personnel are not allowed to request a pre-approval to exceed the cap defined in the Procedure.

For Analytical Personnel, to attend professional conferences or seminars, a pre-approval is required (as long as they fulfil the requirements set in the number 3.3).

6. Gifts and Entertainment register

Every Gift and Entertainment declared by the Employees shall be included by CRA or Group Compliance (accordingly) in the Gift and Entertainment Register.

7. Sensitive Counterparts

The provision of Gifts and/or Entertainment to or at the request of Public Officials/ Sensitive Counterparts is prohibited.

8. Anti - Bribery Policy

It is forbidden for Employees to offer or pay bribes or otherwise engage in bribery. It is also prohibited to provide any business courtesy or items of value as a reward for an activity, which the rewarded person is required to perform, that might in the given context make an impression of impropriety.

Bribery is not limited to cash or items of value, but also may include of business courtesies, Gifts or Entertainment.

Outreach to and professional engagement with Public Officials and Sensitive Counterparts is not considered improper as long as it is within professional boundaries, and does not involve giving or accepting Gifts, Entertainment, bribes or any action or omissions which are against the law.

9. Waivers

CRA Compliance and/ or Group Compliance may grant, at its discretion, a waiver on the above rules regarding giving, soliciting or accepting a Gift or Entertainment, in limited circumstances only, and as long as the requirements set in number 3.2 (a – e) are met.

CRA or Group Compliance reserves the right to withdraw the waiver at any time, if considered necessary to meet any legal or regulatory requirements.



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Compliance with this Policy and requirements regarding breaches

This Policy reflects the way Scope implements regulatory requirements.

If case of questions about this Policy or any doubt as to employees' obligations under this Policy, guidance should be sought from Compliance.

Breach of this Policy may lead to breach of regulatory obligations applying to Scope. As a result, any action by Employees to whom this Policy applies which breaches or might reasonably be expected to lead to or result in a breach, of the provisions set forth in this Policy, is strictly prohibited and can result in disciplinary action, up and including, termination of employment. Any potential infringements of these requirements will be investigated and reported to Senior Management to determine appropriate intervention.

Employees must immediately report breaches or suspected breaches of this Policy to Compliance.



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