



Whistleblower Policy

30 May 2018



1. Introduction

An important aspect of accountability and transparency is a mechanism to enable all individuals to voice concerns internally in a responsible and effective manner when they discover information which they believe shows serious malpractice or wrongdoings that affects other such as clients, other staff, the company or the public interest.

The Whistleblower Policy is therefore fundamental to Scope's professional integrity. In addition, it reinforces the value Scope places on staff to be honest and respected members of their individual professions. It provides a method of properly addressing bona fide concerns that individuals within Scope might have, while also offering whistleblowers protection from victimization, harassment or disciplinary proceedings.

It should be emphasized that the Whistleblower Policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by Scope nor should it be used to reconsider any matters which have been investigated under the harassment, grievance or disciplinary policies and procedures.

2. Applicability

The Whistleblower Policy and its requirements apply to all Employees. Associated non-Employees must acknowledge to abide by this policy.

The contents of the Whistleblower Policy and any future updates or changes are published on Scope's website and are made available on Scope's website and intranet.

Note:

For defined terms used in the Whistleblower Policy please see Scope Defined Terms Glossary that is available on Scope's intranet.

3. Fundamental Elements of the Whistleblower Policy

Whistleblowing is the confidential disclosure by an individual of any concern encountered in the workplace relating to a perceived wrongdoing. Scope considers such wrongdoing to include:

- General malpractice – such as immoral, illegal or unethical conduct; (including where someone's health & safety has been put in danger);
- Gross misconduct;
- Potential infractions of Scope's Code of Ethics or Scope's Code of Business Conduct;
- Potential infractions of requirements under the CRA Regulation;
- Potential infractions of Scope's internal policies or procedures.

All Employees are protected from victimization, harassment or disciplinary action as a result of any disclosure, where the disclosure is made in good faith and is not made maliciously or for personal gain.

By making a confidential disclosure the Employee is required to substantiate his allegation with facts. Any disclosures that are made in good faith and based on facts will be investigated fully including, where necessary, interviews with witnesses and other parties involved.

Anonymity:

Normally, individuals should make disclosures internally. The identity of the whistleblower will be protected at all stages in any internal matter. While the firm can provide internal anonymity, it cannot guarantee this will be retained if external legal action flows from the disclosure.

In case an individual prefers not to disclose her/his name, she/he can leave an enveloped anonymous note in Compliance letterbox or send an anonymous letter (please refer to p. 4 below).

4. Process for Dealing with Whistleblower Disclosures (Raising the Concern)

Individuals may raise a concern through various channels including:

- Scope Group HR: Email: c.werner@scopegroup.com, Phone: +49(0)30 27891-163.



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- Scope Ratings Compliance: Email: compliance@scoperatings.com, Phone: +49(0)30 27891-255.
Letterbox: Scope Ratings Compliance, Lennéstr. 5, 10785 Berlin (Berlin office 9th floor).
- ESMA: Either via ESMA's Direct Supervision mailbox (i.e. the generic mailbox for all correspondence: Supervision-CRA@esma.europa.eu; or via the Supervision Department Secretariat: SUP-secretariat@esma.europa.eu, + 33 (0)1 58 36 65 33.

Note:

In case an Employee chooses to make a disclosure to ESMA directly, Scope will apply the same standards of confidentiality as in the case of an internal disclosure to the extent feasible and appropriate.

5. Non-Retaliation

There will be no adverse consequences for anyone who reports a whistleblower concern in good faith and provided the person who reports reasonably believes the information disclosed, and any allegation contained in it, are substantially true. However, any individual found responsible for making allegations maliciously, for personal gain, or otherwise in bad faith may be subject to disciplinary or legal action.

6. Appendix

What is a qualifying "Whistleblower disclosure"?

A qualifying disclosure is any disclosure of information which – in the reasonable belief of the employee making the disclosure – tends to show that one or more of the following has been committed, is being committed or is likely to be committed:

- A criminal offence.
- A failure to comply with any legal obligation.
- A failure to comply with an requirement under Scope's Code's of Conduct, Policies or procedures
- Miscarriage of justice.
- The putting of someone's health or safety in danger.
- Deliberate concealment of information relating to any of the above.



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