



Gifts, Entertainment and Anti-Bribery Policy

Scope Group

April 2021



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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. Applicability

This Policy and its requirements apply to all Employees. Associated Individuals must acknowledge to abide by this Policy.

The contents of this Policy and any future updates or changes are published on Scope’s website and are made available to Employees on Scope’s intranet.

Note:

For defined terms used in this Policy please see Scope Defined Terms Glossary that is available on Scope’s website and intranet.

3. Gifts and Entertainment

It is forbidden for Employees to request or accept any gifts, favors, services or any kind of financial gratification (“Gifts”) or entertainment (“Entertainment”) from rated entities and/or originator, arranger, sponsor, servicer or any other third party that interacts with Scope CRAs on behalf of a rated entity related parties that are not in line with the requirements of Scope’s Gifts and Entertainment Procedures. Employees may only accept minor items of a gift character received within the framework of a business interaction, provided that their value does not exceed the cap defined in Scope’s Gifts and Entertainment Procedures. For Analytical Personnel it is generally forbidden to request 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 Compliance.

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

In addition, Employees must not accept refund for accommodation, transportation or other expenses in relation with their attendance on conferences organised by rated entities and/or originator, arranger, sponsor, servicer or any other third party that interacts with Scope CRAs on behalf of a rated entity.

In case that an Employee has accepted a Gift or Entertainment, she/he is obliged to notify her/his manager and Compliance immediately, including details of the received items and its value. Compliance will take action, if necessary.

The above restrictions apply to Family Members of Employees, unless those Gifts or Entertainment are not connected with Scope activities.

4. Anti-Bribery Policy

It is forbidden for Employees to offer or pay bribes. 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.

Public Officials/ Sensitive Counterparts

The provision of Gifts and/or Entertainment to or at the request of Public Officials/ Sensitive Counterparts is generally prohibited. Exceptions may be considered in very limited circumstances. Any Entertainment of Public Officials/ Sensitive Counterparts requires pre-approval from Senior Management, or in case of Scope CRAs, from Compliance.

In the context of the Anti-Bribery Policy, payments, gratification and business courtesies to or on behalf of Public Officials/ Sensitive Counterparts must be reviewed and, where necessary, approved by Senior Management or for Scope CRAs Employees by Compliance.

Outreach to and professional engagement with Public Officials/ Sensitive Counterparts are generally not considered improper.



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5. Violation of the Gifts, Entertainment and Anti-Bribery Policy

Employees must immediately report violations or suspected violations of this Policy to their manager, and for Scope CRAs Employees to Compliance.

Any action by Scope or by any Employee which violates, or might reasonably be expected to lead to or result in a violation 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.

In many jurisdictions such breaches might also render an Employee subject to prosecution by a law enforcement or regulatory body which might impose significant penalties for the giving or receiving of payments or gifts, benefits or entertainment that are deemed to be improper inducements for investment or other business.

Scope Management will be responsible for the implementation and the enforcement of this Policy.



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Scope SE & Co. KGaA

Lennéstraße 5
D-10785 Berlin
info@scopegroup.com

Scope Ratings GmbH

Lennéstraße 5
D-10785 Berlin
info@scoperatings.com

Scope Ratings UK Limited

111 Buckingham Palace Road
UK-London SW1W 0SR
info@scoperatings.com

Scope Hamburg GmbH

Stadthausbrücke 5
20355 Hamburg
info@scopehamburg.com

Scope ESG Analysis GmbH

Lennéstraße 5
D-10785 Berlin
esg@scopegroup.eu

Scope Analysis GmbH

Lennéstraße 5
D-10785 Berlin
info@scopeanalysis.com

Scope Investor Services GmbH

Lennéstraße 5
D-10785 Berlin
info@scopeinvestors.com

www.scopegroup.com
www.scoperatings.com
www.scopehamburg.com
www.scopeanalysis.com
www.scopeinvestors.com