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Annex 1

2024

Modern Slavery Statement

This statement is made on behalf of Concur Technologies (UK) Limited ("**Concur UK**"), as approved by its board, pursuant to Section 54 of the Modern Slavery Act 2015 Act covering the financial year ending 31 December 2024. It sets out the steps that Concur UK has taken and is continuing to take to assess and address the risk of modern slavery practices in our supply chain.

Concur UK has prepared this statement with input from SAP's parent company, SAP SE. Concur UK has also consulted and aligned with SAP UK Limited, SAP Australia Limited in preparing this statement. Concur UK does not own or control any other operating entities.

References in this statement to "SAP", "we", "us" and "our" are to SAP SE and, as applicable, the SAP group companies.

SAP Business Structure

Concur UK is a subsidiary of SAP SE, a European multinational software and services corporation and a market leader in enterprise application software as well as in enterprise resource management applications, supply chain management applications, procurement applications software, travel and expense management software, and enterprise resource planning software, among others. In addition, SAP delivers relevant, reliable, responsible AI built into SAP business solutions. SAP SE is headquartered in Walldorf, Germany and has a global presence.

SAP's purpose is to "help the world run better and improve people's lives." Our products and services aim to help our customers both meet the challenges and take advantage of the opportunities presented by today's rapidly changing world.

As a global leader in enterprise applications and business AI, SAP stands at the intersection of business and technology. For over 50 years, organisations worldwide have trusted SAP to unlock their full potential by seamlessly integrating critical business operations across finance, procurement, human resources, supply chain, and customer experience. More information on SAP's offerings is available at SAP Products. SAP's integrated applications connect all parts of a business into an intelligent suite built on a fully digital platform. Today, SAP serves more than 230 million cloud users with over 100 solutions covering all business functions, offering the largest cloud portfolio of any provider.

More information on SAP's structure and offerings is available in the SAP Integrated Report 2024.

Modern Slavery and Human Rights

At SAP, we believe we have a responsibility to respect human rights throughout all our business operations. We have policies and procedures to combat the risk of slavery in our

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business and our supply chains and to ensure a healthy working environment for all our staff.

SAP respects and upholds the values of the International Bill of Human Rights and the International Labour Organisation's (ILO) Core Labour Rights Conventions. In addition, SAP takes guidance from international frameworks such as the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, to integrate human rights considerations into SAP standard business practices, policies, and processes. SAP has signed the United Nations Global Compact, pledging to align its strategies and operations with universal principles related to human rights, labour, the environment, and anti-corruption.

Our Global Human Rights Commitment Statement describes SAP's human rights-related action areas including modern slavery, human rights governance and risk management system, prioritised risks, preventive and remedial measures, and expectations placed on employees and all business partners. It applies to all SAP operations worldwide. The current version is available on our SAP Global Human Rights Commitment Statement website and has been rolled out globally to employees and suppliers. Ultimate responsibility for our Global Human Rights Commitment Statement lies with the SAP Executive Board. The current version of the Human Rights Commitment Statement is available at SAP Global Human Rights Commitment Statement.

SAP is committed to respecting its employees' fundamental rights at work. As outlined in SAP's Global Code of Ethics and Business Conduct for Employees, employees are also expected to comply with all applicable laws, regulations, company policies, and fundamental principles relating to human rights.

We do not accept forced, bonded, or involuntary prison labour nor any form of human trafficking. Employment at SAP is voluntary. Employees are free to leave their jobs after any required notice periods, where applicable and consistent with their employment contracts. In SAP's recruiting and hiring processes we ensure that employees do not have to pay recruitment fees. We also make sure that they are not required to lodge deposits, identity papers, or any other documents that might limit the worker's legal status, their freedom to travel or the ability to leave their job temporarily or permanently upon commencing employment with SAP.

SAP respects the rights of our employees to organise and to be represented by trade unions and other bona fide representatives of employees in accordance with local laws and engage in a constructive dialogue with employee representatives. Where local laws restrict the establishment of certain employee representations, we are open to other forms of employee representation that are not prohibited under local law.

These employee representative bodies consist of elected union members and/or non-union members, and are consulted by SAP management mainly on topics that define the work environment and work processes. Collective bargaining agreements with unions are made in countries where legally required.

SAP does not tolerate child labor. This is ensured via HR recruiting and hiring processes and governance. To foster quality education and job opportunities, we offer different vocational

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training programs which may include minors under the age of 18. They receive a special employment contract and special care is paid to safeguard limitation of working hours and protect their well-being.

We ensure that our workers are compensated with wages and benefits that meet or exceed the legally required minimum. Laws relating to pay, employment benefits, hours of work, time off, leaves of absence and other terms and conditions of employment vary from country to country. We are expected to comply with all applicable employment-related laws. This is ensured via SAP HR processes and governance.

Due Diligence Processes

SAP's Human Rights Commitment Statement has a global scope, it applies to SAP operations worldwide. SAP also expects all business partners (for example, suppliers, partners, customers) to respect human rights and act in line with global human rights frameworks.
The Human Rights Commitment Statement applies to SAP operations worldwide. We expect all our suppliers and partners to respect human rights and to avoid complicity in human rights abuses. SAP's Supplier Code of Conduct and Partner Code of Conduct require our suppliers and partners to uphold labour rights and to provide a safe and healthy work environment for all employees. SAP also has established contractual assurances through the codes of conduct for suppliers and partners, which are an integral part of SAP's respective General Terms & Conditions.

Supply Chain

SAP operates a global value chain, providing cloud-based software, services, and support to customers worldwide. While SAP does not manufacture any physical products, it relies on a complex supply chain to support its daily operations in offices and data centres. This supply chain is a crucial part of SAP's upstream value chain and involves the procurement of technology, hardware, and services, as well as the management of relationships with suppliers and partners to deliver integrated solutions.

SAP's supply chain consists of thousands of suppliers from around the world who provide products and services essential for the development and delivery of SAP's offerings. Key procurement items include hyperscaler services and IT hardware.

We acknowledge that in our extended supply chains, we are exposed to risks in the area of working conditions, environment or health and safety, especially when purchasing products or services from high-risk industries or when purchasing in countries with higher risks to human rights. SAP actively manages and assesses the social and ethical impacts of its supply chain, with a focus on protecting vulnerable groups and fostering responsible business practices throughout its value chain.

Risk Assessment and Management

In our commitment to addressing modern slavery risks, SAP conducts a comprehensive risk analysis across the value chain to identify and prioritise human rights risks, ensuring compliance with relevant legal frameworks. We continuously monitor and evolve this process

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and seek to embed it into our organisation and business relationships.

SAP's Human Rights Due Diligence program assesses and prioritises the material matters concerning our own employees and value chain workers, such as adequate wages, health and safety, gender equality, equal pay for work of equal value, measures against violence and harassment, and eradication of child and forced labour. We use Environmental, Social and Governance risk management software to ensure we have a structured process for assessing potential impacts of our own operations and those of our direct ("Tier 1") suppliers. For information about our suppliers, see the Workers in the Value Chain section of the SAP Integrated Report 2024.

Our risk assessment process includes the following steps:

- **Step 1:** Performing an abstract risk analysis in which country-specific and industry-specific risks related to human rights and environmental standards are evaluated by referencing quantitative indicators from the World Bank and the United Nations and qualitative data from sources such as the Corporate Social Responsibility Risk Check of the German Helpdesk on Business and Human Rights.

- **Step 2:** Performing a concrete risk analysis in which we identify risks from our own operations and from our direct suppliers. For our own operations, we examine high-risk clusters more closely by interviewing experts, drawing on internal data from, for example, our complaints mechanisms and environmental management system, and queries from the country-specific financial risk identification process.
  SAP also conducts detailed assessments of high-risk direct suppliers, particularly those with significant spend (that is, of more than €50,000) by using questionnaires to gather information about their response to the risks that were identified.

- **Step 3:** Prioritising the assessment of potential negative impacts related to our own operations and value chain based on criteria such as the nature of our business activities, our ability to influence suppliers, probability and severity (scale, scope, remediation) of potential violations, and the nature of our causal contribution.

The findings are integrated into regular risk analysis that is carried out at least annually and as required on an ad hoc basis. SAP has also used and will continue to use an external service provider to conduct risk analysis.

SAP also assesses potential impacts related to our indirect ("tier 2-n") upstream supply chain and downstream value chain. For example, we use impact measurement and valuation to gain an understanding of positive and negative impacts in our value chain. For more information about our impact measurement and valuation, see the "Impact Valuation Approach" section of the SAP Integrated Report 2024.

Risks of Modern Slavery in our Supply Chains

SAP continues to monitor the risks of modern slavery in its supply chain, and has identified the following focus areas to strengthen controls and processes:

- Employees and contractors who support SAP's internal business operations, which

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includes labour in developing countries who provide software IT/ HR/ Finance shared service support services to SAP;

- Employees and contractors who support maintenance of SAP's software and development of solutions for SAP's customers which includes software development and maintenance personnel in developing countries;
- Suppliers of corporate and facilities management services to SAP such as cleaning and facilities contractors;
- Suppliers who provide data centre facilities and services to SAP;
- Suppliers who provide external staffing to SAP;
- Suppliers of stationery, kitchen supplies, marketing supplies; and
- Other suppliers located in developing countries.

SAP assesses the effectiveness of its actions by monitoring whether any incidences of modern slavery have been identified through its risk assessment and audit processes. We continue to review our processes in conjunction with the broader SAP group to help assess and address modern slavery risks in our operations and supply chains.

Key Performance Indicators

We continually assess the effectiveness of the measures we have in place to identify and manage modern slavery risks. Examples of other performance indicators SAP has in place include:

- Keeping record and measuring percentage of completion rate of employees conducting their annual compliance training;
- Number of whistleblowing alerts; and
- Number of employee discrimination complaints.

We encourage all employees, including temporary external staff, to report conduct that violates our policies. Our whistleblower reporting tool is also available to external groups.

Whistleblower Reporting Tool and Policy

SAP recognises the importance and encourages the reporting of potential misconduct or a potential improper state of affairs relating to the Company. To foster the goal that every SAP employee worldwide can be heard and speak out without fear and retaliation, we have established a Global Ombuds Office which operates as an informal, independent, and confidential channel on top of the formal complaint mechanisms in place, including our Speak Out whistleblower reporting tool.

Speak Out at SAP is SAP's independently hosted whistleblower reporting tool, through which any matter or concern can be reported easily, and, if desired, anonymously. The tool is available 24 hours a day, seven days a week, both internally to SAP employees and externally to concerned parties, including customers, suppliers, and partners. The tool is managed by SAP.

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Reports may be submitted either directly by the reporter through the Internet based portal, or by phone with local language support across the globe to maximise accessibility for reporters. In all cases, SAP continues to maintain a strict non-retaliation policy.
Through this tool, we encourage all employees, including temporary external staff, to report conduct that violates our policies. Beyond Speak Out at SAP, we provide further reporting channels, including the internal ticketed system, a postal address for written submissions, as well as local contact persons worldwide.

SAP's Global Code of Ethics and Business Conduct for Employees

1 SAP's Global Code of Ethics and Business Conduct For Employees outlines our continued commitment to ethical business practices and legal compliance. Approved by the Executive Board, the Global Code of Ethics and Business Conduct For Employees sets the standard for our employees in their dealings with customers, partners, competitors, and vendors. This Global Code is translated into local languages.

We have developed a compliance management system for enforcing ethical business conduct. This includes detailed policies and procedures to ensure that SAP does business the right way. Audited regularly, the system encompasses all aspects of compliance management. From the analysis of compliance risks and defining objectives to running compliance programs as well as ongoing monitoring, this comprehensive framework enables us to be a responsible compliance organisation.

Every SAP employee is made aware of the Global Code of Ethics and Business Conduct For Employees that applies to them and is under an obligation to comply. SAP employees are asked by the Executive Board to confirm their commitment to the Global Code of Ethics and Business Conduct. SAP's Office of Ethics and Compliance monitors both the Global Code of Ethics and Business Conduct and compliance. SAP also has in place a Code of Business Conduct for External Workers that is required to be signed prior to the onboarding of contractors.

SAP's Global AI Ethics Policy

SAP further recognises the transformative potential of Artificial Intelligence (AI) for businesses, governments, and society, while acknowledging the economic, political, and societal challenges it may pose if not responsibly implemented. Guided by SAP's Global Human Rights Commitment Statement and aligned with UNESCO's "Recommendation on the Ethics of Artificial Intelligence", **SAP's Global AI Ethics Policy** establishes clear principles to ensure the ethical development, deployment, and use of AI systems. These principles emphasise fairness, transparency, privacy, safety, and sustainability, among other core values. To uphold these standards, SAP has established governance structures, including the AI Ethics Steering Committee, which oversees internal implementation, and the SAP Global AI Ethics Advisory Panel, which brings external expertise to enhance policies and decision-making.

Training

SAP has a thorough mandatory compliance training programme incorporated both live and e-learning trainings. Some components of this training are run annually, such as the recommitment to the Global Code of Ethics and Business Conduct by every employee. In

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2024, the confirmation rate for the Code in the United Kingdom stood at 96.99%. The adherence to the Code is monitored, and any breaches will be investigated. While some trainings are mandatory for every employee, others may be mandated only for specific roles. Completion of trainings is monitored by the Office of Ethics and Compliance. Any violation by an employee can result in disciplinary actions, including termination of employment.

Effectiveness Assessment

SAP employs a comprehensive, multi-layered approach to assess the effectiveness of its preventive, remedial, and due diligence measures to ensure that modern slavery does not occur in its business or supply chain. This assessment is embedded in SAP's broader human rights and supply chain due diligence framework, as detailed in its SAP Global Human Rights Commitment Statement. This approach enables continuous improvement and compliance with legal and regulatory requirements.

This statement was approved by the board of Concur UK Limited effective 30 June 2025.

Signature: Signed by: Victor Brito Domingos 7FDDF418BE43438...

Name: Victor Brito Domingos

Title: Concur CFO

Date: June 26, 2025