

2022

Modern Slavery Statement

This statement is made on behalf of SAP (UK) Limited (“**SAP UK**”), as approved by its board, pursuant to Section 54 of the Modern Slavery Act 2015 Act covering the financial year ending 31 December 2022. It sets out the steps that SAP UK has taken and is continuing to take to mitigate risks that modern slavery and human trafficking are not taking place within SAP UK’s business or supply chain.

SAP UK has prepared this statement with input from SAP’s parent company, SAP SE. SAP UK has also consulted and aligned with SAP Australia Pty Ltd in preparing this statement.

SAP Business Structure

SAP UK is a subsidiary of SAP SE, a European multinational software and services corporation and a market leader in enterprise application software, enterprise resource management applications, supply chain management applications, procurement applications software, travel and expense management software, and enterprise resource software, among others. SAP SE is headquartered in Walldorf, Germany and has a global presence. SAP UK has offices located in Belfast, Crawley, Feltham, London, Maidenhead, Manchester, and Sittingbourne and serves over 4,500 customers within the region in some of the following industries: public services, energy and natural resources, retail and consumer packaged goods, utilities and telecommunications, and financial services and insurance. SAP UK has been in operation for 36 years.

SAP’s purpose is to “help the world run better and improve people’s lives”. SAP strives to achieve this as both an enabler and an exemplar of sustainable business. 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. SAP is committed to the goal set by the Paris Agreement of limiting global warming to 1.5 degrees Celsius in comparison to pre-industrial levels. In March 2021, SAP announced the intention to become carbon neutral in our own operations by the end of 2023 – two years earlier than previously stated. Further, in January 2022, SAP announced its commitment to achieve net-zero along their value chain in 2030; 20 years earlier than originally targeted. SAP also supports the United Nations Sustainable Development Goals (“**UN SDGs**”). Together with our customers and partners, we are engaged in initiatives across the UN SDGs.

SAP has the technologies, products, footprint, and experience to combine four essential end-to-end business processes to create not just one intelligent enterprise, but a global ecosystem of intelligent enterprises:

- SAP S/4 HANA Cloud provides modular cloud ERP in the areas of finance, supply chain, and sustainability among others –and can enable customers to adjust and adopt business process and business models.
- SAP SuccessFactors Human Experience Management (HXM) Suite provides cloud-based solutions, such as a human resources management system (HRMS) for core HR and payroll, talent management, employee experience management, and people analytics, by aiming to create differentiated employee experiences across the employee lifecycle.
- SAP’s intelligent spend management applications aim to provide a more unified view of a customer’s spending to reduce costs, mitigate risks, improve collaboration, and make sure every spend decision is aligned with the business strategy.



- Our SAP Customer Experience solutions deliver a personalized view across customers and business partners, connecting the front-and back office with solutions spanning from the point of sale, to manufacturing, to logistics, customer experience, and returns management.
- SAP Business Technology Platform (SAP BTP) is a business-centric platform that enables customers and partners to extend and customize SAP applications in a cloud-native way. It allows shared data and insights, AI-powered experiences, as well as partner solutions and customer-led customizations. Specifically, it provides capabilities in four key areas: database and data management; analytics and planning; application development and integration; and intelligent technologies such as AI, all bundled into one platform offering.
- SAP's Industry Cloud provides the opportunity for SAP and our partners to extend our core with modular solutions addressing industry-specific functions, built on SAP BTP.
- SAP Business Network is a network of enterprises. The interactive community helps enable companies to extend their ecosystem, react to supply chain disruptions, discover new trading partners, and find new opportunities, all through a unified, role-based experience.
- SAP's Business Process Intelligence (BPI) application portfolio, which has been significantly expanded with the integration of Signavio solutions, helps our customers enable their business transformations. We support analysis of current processes, benchmarking against best practices, and reconfiguring current processes towards future processes.
- Our sustainability management solutions empower customers to integrate sustainability into their business processes –from ethical sourcing and inclusive hiring to visibility into and management of a company's overall ecological footprint. The solutions aim to help our customers minimize carbon emissions, reduce waste through responsible supply chain management, and enable diversity across all business practices.

More information on SAP's business structure and offerings can be found in the [SAP Integrated Report 2022](#).

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

SAP's Commitment to Human Rights and Fighting Modern Slavery

At SAP, we believe we have a responsibility to respect human rights throughout all of our business operations. We have a number of policies and procedures to mitigate the risk of slavery or human trafficking occurring in our business or any of our supply chains and to ensure a healthy working environment for all our staff and contractors, which together set out the standards that we expect our people and all who work with us, or on our behalf to support and uphold.

SAP is a signatory of the United Nations Global Compact. This is a voluntary undertaking to align our strategies and operations with universal principles on human rights, labour, the environment, and anticorruption.

By integrating human rights considerations into SAP's standard business practices, we also support the values of the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. To ensure that our commitment to human rights translates into practice, we take guidance from the United Nations "Protect, Respect and Remedy" framework.



The Human Rights Commitment Statement details SAP's response to the international standards mentioned above. The statement focuses on three main areas: SAP's employees, SAP's ecosystem of partners and suppliers, and SAP's solutions.

At SAP, we strive for constructive labour relations across the world, working within each country's requirements. We currently have social partners in 37 countries in Europe, Asia, Africa and the Americas. 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 only made in countries where legally required. Overall, about 50% of our employees are represented by works councils or an independent trade union or are covered by collective bargaining agreements.

These works councils consist of both elected union members and non-union members and are consulted by SAP management on topics that define the work environment and work processes. These include HR initiatives, payment and benefits, equal opportunities, changes in work or IT processes, and health and safety protection.

Human Rights Risk Assessment and Management

[SAP's Global Human Rights Commitment Statement](#) applies to all of SAP's operations and subsidiaries globally and is updated on a regular basis. Since 2012, we have conducted regular internal audits to verify that SAP adheres to its human rights standards and to check internal compliance with our human rights commitment statement. In 2018, SAP conducted labour audits across nine countries in the Middle East and North Africa region. In 2019, labour audits were conducted in Mexico and Columbia. There were no findings of labour rights abuses in either the 2018 or 2019 audits. In 2020, SAP conducted a labour audit at SAP Argentina, which included review of labour conditions, wages and hours, health and safety, the environmental management system and business practices. SAP did not encounter any abuses in these areas. At the end of 2021, SAP commenced a labour audit at SAP China, whereby we reviewed labour conditions, wages and hours, health and safety, environmental management system, and business practices; No major issues were encountered in these areas. SAP's global internal audit program is currently being adapted based on recent legal requirements.

SAP takes the risk of modern slavery in our supply chains very seriously and has processes in place to support investigation of suspicious behaviour and appropriate steps will be taken if needed, which may include termination of a contract with a supplier.

In 2022, we piloted new concepts for identifying human rights risks across our own operations and our direct supply chain, globally, to evaluate our compliance with increasing legal requirements such as the German Supply Chain Due Diligence Act (LkSG). By using impact measurement and valuation to assess our performance on selected human rights, we identified six employees at SAP Brazil, whose compensation was adjusted to meet our ambition of ensuring a decent living, as measured through the Value Balancing Alliance methodology.

We have also started to analyse potential risks related to our solutions and customers and among indirect suppliers. The analysis included, potential risks based on their severity (scale, scope, remediability) and probability of occurrence as well as our ability to trigger change, as well as risks related to the countries and industries we operate.

Based on this risk analysis, SAP believes there is a low risk of modern slavery within its own operations and with its suppliers due to the processes in place as outlined above.



Key Performance Indicators

We encourage all employees, including temporary external staff, and all external parties to report conduct that violates our policies and raise any concerns related to modern slavery or other human rights through our global whistleblower reporting tool “Speak Out at SAP”. As of the end of 2022, no reports have been received by SAP from employees, the public, our suppliers, or law enforcement agencies to indicate that any modern slavery practices have been identified at SAP or among our suppliers.

In addition, SAP measures the percentage of employees who have certified to the Code of Ethics. In 2022, we recorded a 99.9% certification rate for permanent SAP employees (excluding those from acquired companies).

Our Suppliers and Partners

We expect all of our suppliers and partners to respect human rights and to avoid complicity in human rights abuses. Our [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.

We work collaboratively with our suppliers and partners on the implementation of these codes. In addition, we may carry out on-site audits to assess performance. As a business software company, we are committed to respecting human rights throughout the lifecycle of our products – from design through development to use. We develop innovative solutions that help customers embed human rights standards into their business and supply chain strategies.

In countries where SAP identifies that an existing supplier does not comply with applicable legislation, SAP may consider relevant steps to mitigate associated risks or take other appropriate steps, up to and including termination of the agreement. The importance of complying with labour and employment laws, such as the local applicable minimum wage legislation or other local laws regarding wages, hours, and conditions of employment is highlighted as being of the utmost importance.

SAP Code of Business Conduct for Employees

SAP’s [Global Code of Ethics and Business Conduct for Employees](#) (“**Code of Ethics**”) outlines our continued commitment to ethical business practices and legal compliance. Approved by the Executive Board at SAP, 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. It is adapted locally and 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 Code of Ethics that applies to them and is under obligation to comply. SAP’s Office of Ethics and Compliance department monitors both the Global Code of Ethics and Business Conduct for Employees 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.



Training

A code of business conduct is only effective if everyone knows about it. That is why we strive to make sure all of our employees receive training on the standards that we expect.

Our employees receive voluntary and mandatory training on human rights issues most relevant to SAP, such as non-discrimination, health and safety management, data protection and privacy. In 2023, to increase the awareness of our grievance mechanism, we plan to introduce new training modules for all employees and for specific roles.

In addition, employee representatives in Germany and Europe were consulted to understand their concerns and interests related to the rights protected by the LkSG, which resulted in feedback on the accessibility and awareness of the Speak Out at SAP reporting tool, as our channel to raise concerns related to human or labour rights.

Whistleblower Reporting Tool and Policy

In 2022, we strengthened our process related to human rights complaints and our Speak Out at SAP reporting tool. Through this tool, we encourage all employees and external groups, including groups at heightened risk of becoming disadvantaged or marginalized (also referred to as “vulnerable groups”) such as temporary external staff, to report conduct that violates our policies.

SAP will take appropriate steps to address any adverse findings, as appropriate.

This statement was approved by the board of **SAP (UK) Limited** on 2 August 2023.

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Title: Chief Financial Officer, SAP UKI

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