2023
Modern Slavery Statement

This statement is made on behalf of SAP Australia Pty Ltd ("**SAP Australia**") and is made pursuant to s.13 of the *Modern Slavery Act 2018* (Cth). It sets out the steps that SAP Australia has taken and is continuing to take to mitigate risks of modern slavery and human trafficking existing within SAP Australia's business or supply chain.

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

SAP Business Structure

SAP Australia 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 – to help you predict, manage, and navigate whatever comes next. SAP SE is headquartered in Walldorf, Germany and has a global presence. SAP Australia has offices located in Sydney, Melbourne, Brisbane, Canberra and Perth. SAP Australia together with SAP New Zealand serves over 6000 customers within the Australia and New Zealand region, over ninety per cent of which are small or medium enterprises. The customer base also comprises customers in major industries, including public services, energy and natural resources, retail and consumer packaged goods, utilities and telecommunications, and financial services and insurance. SAP Australia has been in operation for over 30 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 January 2022, SAP announced its commitment to achieve net-zero along our 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 personalised 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 and open platform that enables customers and partners to extend and customise SAP applications in a cloud-native way. It allows shared data and insights, AI-powered experiences, as well as partner solutions and customer-led customisations. 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 the management of the green ledger, to visibility into and management of a company's overall ecological footprint. The solutions aim to help our customers minimise 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 2023.

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

Modern Slavery and Human Rights

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 contracts, 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. SAP welcomes and supports the UN Guiding Principles on Business and Human Rights to implement the United Nations "Protect, Respect and Remedy" Framework and seek to continuously embed them in our policies and processes. This framework provides the global standard for preventing and addressing the risk of adverse impacts on human rights linked to business activity.

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 SAP's 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. Approved by our Executive Board, the current version of the Human Rights Commitment Statement is available at www.sap.com/human-rights.

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 52% of our employees are represented by works councils or an independent trade union, or are covered by collective bargaining agreements.

Risk Assessment and Management

As a global company, SAP is exposed to a broad range of risks across our business operations. Consequently, our Executive Board has established comprehensive internal control and risk management structures that enable us to identify and analyse risks early and take appropriate action. Our internal control and risk management systems are designed to identify potential events that could negatively impact the Company and to provide reasonable assurance regarding the operating effectiveness of our internal controls over our financial reporting.

Our cross-company agenda on human rights is driven by SAP's Human Rights Office that is part of the chief sustainability officer's organisation. At least once a year, the Human Rights Office reports to the Executive Board on such matters as the status of compliance with the German Supply Chain Act (Lieferkettensorgfaltspflichtengesetz, LkSG). The Human Rights Office works together with a Human Rights Steering Committee comprised of executives from

various Board areas who embed human rights due diligence in their areas of responsibility, such as enterprise risk management, people management, or procurement.

SAP's Global Human Rights Commitment Statement applies to all of SAP's operations and subsidiaries globally and is updated on a regular basis. SAP regularly reviews its performance in relation to human rights, including considering external benchmarks, performance ratings, audit results, and stakeholder feedback. In addition, 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 policy.

Global AI Ethics Policy

Grounded in our commitment to respecting human rights, the Artificial Intelligence (AI) Ethics Steering Committee guides our internal efforts to implement and enforce AI ethics in our operations, solutions, and policies. It comprises SAP executives from relevant Executive Board areas with supervision of topics relevant to guiding and implementing AI ethics. Made up of experts from academia, industry, and public policy, our external AI Ethics Advisory Panel advises us on how to further develop and operationalise SAP's Guiding Principles for Artificial Intelligence.

The Global AI Ethics Policy helps ensure that our AI systems are developed, deployed, and sold in line with the ethical standards laid out in our guiding principles. This policy and guiding principles are available at https://www.sap.com/sustainability/our-approach/reporting-and-policies.html#reporting

Key Performance Indicators

Following SAP Australia's due diligence and auditing procedures, no reports have been received by SAP Australia from employees, the public, our suppliers, or law enforcement agencies to indicate that any modern slavery practices have been identified.

Examples of other performance indicators SAP Australia has in place include:

- Keeping record and measuring percentage of completion rate of employees conducting their annual compliance training;
- Number of whistleblowing alerts;
- Number of complaints to the AHRC; 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 Australia Pty Ltd 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 of 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 managed whistleblower reporting tool, through which any matters or concerns 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.

Reports may be submitted either directly by the reporter through the Internet based portal, or by phone, with local language support across the globe in order to maximise accessibility for reporters. In all cases, SAP continues to maintain a strict non-retaliation policy.

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

As of the end of 2023, 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 supplier base. Beyond Speak Out at SAP, we provide further reporting channels, including an internal ticketing system, a postal address for written submissions, as well as local contact persons worldwide.

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 onsite 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.

SAP Australia requests that its suppliers confirm compliance with SAP's Supplier Code of Conduct, in addition to any other applicable laws, statutes, regulations and codes in respect of anti-slavery.

SAP Australia also requests its significant suppliers provide additional information regarding modern slavery, including information on:

- due diligence procedures and mitigation plans they follow for their suppliers, subcontractors and other participants in their supply chain to mitigate risks of modern slavery, and

- testing measures they have in place to assess the effectiveness of actions taken against modern slavery in their supply chain and operations.

SAP Code of Business Conduct for Employees

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 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. 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'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.

Training

A code of ethics and 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.

SAP has a thorough mandatory compliance training program, incorporating 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. 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.

Risks of Modern Slavery in our Supply Chains

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

- Employees and contractors who support SAP's internal business operations, which 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 Australia believes there is a low risk of modern slavery with its suppliers due to the processes in place as outlined above. In relation to labour provided to SAP Australia from developing countries, the majority of this workforce are employees of the SAP global group of companies and the SAP Group has policies and processes in place to ensure compliance with all applicable labour laws in relation to its employees.

Where SAP outsources hiring to external vendors, SAP only uses reputable recruitment agencies. These suppliers are required to abide by SAP's Supplier Code of Conduct. Third Party Risk Management due diligence is conducted in the form of a questionnaire. This questionnaire enables SAP to determine the level of supplier risk, specifically for fraud, bribery, corruption, and conflict of interest, as these risk factors would impact ethical and fair recruitment.

SAP Australia 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 have also implemented questionnaires for our significant suppliers to complete, and we continue to review our processes and frameworks, in conjunction with the broader SAP group or companies, to help assess and address modern slavery risks in our operations and supply chains.

SAP Australia 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.

Remediation

- Actions taken by SAP Australia to assess and address modern slavery risks include having a policy requiring SAP Australia's suppliers comply with SAP's Supplier Code of Conduct or equivalent standards (for example where a supplier has its own code of conduct that substantively addresses the modern slavery requirements), and implementation of a questionnaire for completion by SAP Australia's significant suppliers. SAP Australia will take appropriate steps to address any adverse findings, as appropriate.
- SAP raises awareness among SAP employees about policies (e.g. Global Code of Ethics and Business Conduct) during onboarding session and during refresher sessions.
- If SAP Australia identifies that an existing supplier does not comply with Anti-Slavery Legislation or Labour Hire Licensing Laws, SAP Australia may terminate the Supplier's services agreement with SAP Australia or take other appropriate steps.

This statement was approved by the board of **SAP Australia Pty Ltd** effective 30 June 2024.

Signature:

Name: Angela Celantuono
Title: President and managing Director, SAP ANZ
Date: 25 June 2024