2020

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)* ("**MSA 2018**"). 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 Business Structure

SAP Australia is a subsidiary of SAP SE, a European multinational software and services corporation and the market leader in enterprise application software used by our customers to manage business operations and customer relations. SAP SE is headquartered in Walldorf, Baden – Württemberg, Germany with regional offices in 130 countries. SAP Australia has offices located in Sydney, Melbourne, Brisbane, Canberra and Perth. SAP Australia together with SAP New Zealand serves over 4600 customers within the Australia and New Zealand (ANZ) region 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 is a market share leader in enterprise resource planning (ERP), analytics, supply chain management, human capital management as well as experience management and customer experience.

SAP has a broad portfolio of modular and suite solutions available on premise, in the cloud and hybrid. SAP's product portfolio includes:

- SAP Business Network solutions – including Ariba Network, SAP Asset Intelligence Network, SAP Logistics Business Network and SAP Fieldglass

- Business Process Intelligence solutions

- SAP Business Technology Platform

- Industry Cloud solutions

- SAP Customer Experience solutions integrated with Experience Management capabilities

- SAP S/4 HANA Enterprise Resource Planning software suite

- Intelligent Spend Management solutions

More information on SAP's business structure and offerings can be found in the SAP Integrated Report 2020.

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

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.

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.

At SAP, we strive for constructive labour relations across the world, working within each country's requirements. We currently have works councils in place in Belgium, Germany, Ireland, Italy, the Netherlands, Slovenia, Spain, and the United Kingdom. In addition, we have a European works council that represents employees from all SAP subsidiaries in Europe.

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.

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. 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. 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. SAP Australia is currently assessing its suppliers and the SAP group plans to continue its global internal audit program in other locations.

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 grievance mechanisms are also available to external groups.

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

SAP Australia also request its 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 Code of Business Conduct For Employees outlines our continued commitment to ethical business practices and legal compliance. Approved by the Executive Board at SAP, the Code of 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 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 Code of 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 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.

Risks of Modern Slavery in our Supply Chains

SAP Australia has identified the following areas where modern slavery risks may be present:

- Employees and contractors who support SAP's internal business operations, which includes labour in developing countries such as the Philippines 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 such as India;

- Suppliers of corporate and facilities management services to SAP such as cleaning and facilities contractors;

- 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.

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 development of a questionnaire for completion by SAP Australia's suppliers that is in the process of being implemented, that SAP Australia will assess. SAP Australia will take appropriate steps to address any adverse findings, as appropriate.

- SAP raises awareness among SAP employees about policies (e.g. Code of 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.

Improving Sustainability Through Practice

The SAP Ariba Supplier Risk solution enables our Global Procurement Organisation to identify, manage, mitigate, and avoid sustainability risks within our supply chain. These risks include, for example, workplace discrimination, workplace safety neglect, the use of child labour, human trafficking, and environmental disasters such as oil spills and radioactive contamination.

This statement was approved by the board of **SAP Australia Pty Ltd** on 23 June 2021.

Name: Damien Bueno

Title: President and Managing Director, SAP Australia & New Zealand

Signature:

Date: 9th July, 2021