



SAP Australia Modern Slavery Statement 2024

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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)* covering the financial year ending 31 December 2024. It sets out the steps that SAP Australia has taken and is continuing to take to assess and address 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.

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

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 such as 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 Australia is a proprietary company limited by shares incorporated in Australia with its registered address at Level 13, 1 Denison Street, North Sydney NSW 2060. SAP Australia has offices located in Sydney, Melbourne, Brisbane, Canberra and Perth. SAP Australia together with SAP New Zealand serves over 8000 customers within the Australia and New Zealand (ANZ) region, including small or medium enterprises. The customer base also comprises customers in major industries such as public services, healthcare, energy and natural resources, utilities, financial services, telecommunications, retail and consumer packaged goods, as well as insurance. SAP Australia has been in operation for over 35 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. We support the United Nations Sustainable Development Goals (UN SDGs). Together with our customers and partners, we engage in several initiatives across the UN SDGs.



As a global leader in enterprise applications and business AI, SAP stands at the intersection of business and technology. For over 50 years, organisations have relied on SAP to unlock their full potential by seamlessly integrating business-critical operations across:

1. Financial management

SAP S/4HANA Cloud provides software capabilities mainly for finance, risk management, project management, procurement, manufacturing, supply chain management, asset management, and R&D. These capabilities form the foundation for driving revenue growth, controlling costs, minimising risk, and advancing sustainability.

2. Spend management

SAP's spend management solutions unify procurement, travel, expenses, and external workforce management to reduce costs, mitigate risks, and improve collaboration. Key products include SAP Ariba, SAP Concur, and SAP Fieldglass, helping businesses optimise spending and align it with their strategy.

3. Supply chain management

SAP's supply chain management solutions help businesses build connected, contextualised, and collaborative supply chains that are risk-resilient and sustainable, enabling them to design out risk from end to end and adapt to changing conditions for sustainable growth.

4. Human capital management

SAP SuccessFactors is a cloud-based, AI-enabled human experience management suite that helps organisations optimise HR processes (payroll, talent management, employee experience, and analytics). It seeks to enhance employee-employer relationships and enable organisations to build an agile, future-ready workforce.

5. Customer Experience

SAP Customer Experience (CRM & CX) solutions enable businesses to create seamless, AI-powered customer journeys that connect demand with operational processes across marketing, sales, service, commerce, and data management, driving loyalty and sustainable growth through tight integration with SAP S/4HANA and other ERP systems.

6. Sustainability management

Sustainability Management Solutions: Integrates sustainability in operations, focusing on carbon footprint reduction and ethical business practices.



SAP Business Suite: To stay competitive in a rapidly evolving landscape, businesses must transform at scale with agility. SAP's cloud solutions and real-time data insights, powered by SAP Business Technology Platform, enable organisations to achieve greater flexibility, efficiency, and rapid adaptation to changing demands. SAP Business Suite unlocks new pathways to innovation and operational excellence by seamlessly connecting SAP Cloud ERP applications, SAP Business AI, and SAP Business Data Cloud, delivering business value on a unified, intelligent platform.

Modern Slavery and Human Rights

SAP is committed to respecting and advancing human rights across its operations, extended supply chain, and product lifecycle. SAP also expects its employees and business partners to respect human rights and to avoid complicity in any abuse.

We have a number of policies and procedures to mitigate the risk of modern slavery or human trafficking occurring in our business or any of our supply chains and to facilitate 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 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.

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 seek to 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 labour. This is supported via HR recruiting and hiring processes and governance. To foster quality education and job opportunities, we offer different vocational 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 seek to 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 supported via SAP HR processes and governance.

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 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 help 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.

When outsourcing recruitment, SAP Australia exclusively engages reputable agencies that must adhere to SAP’s Supplier Code of Conduct. As represented by the Supplier Ethics and Compliance Questionnaire (SECQ), supplier due diligence, triggered throughout the TPRM (third-party risk management) process, includes a comprehensive questionnaire designed to evaluate supplier risks, particularly concerning fraud, bribery, corruption, and conflicts of interest factors that directly impact ethical recruitment practices. 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.



Risks of Modern Slavery in our Supply Chains

SAP Australia 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 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 center 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 within its supplier network due to the robust processes outlined above. Regarding labour sourced 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 support 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 non-compliant supplier.

Key Performance Indicators

Following SAP Australia's due diligence and auditing procedures, SAP would also give serious consideration to any reports from employees, the public, our suppliers, or law enforcement agencies regarding identifying any modern slavery practices.

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 Australian Human Rights Commission; 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.

External Measures to address Modern Slavery Risks

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.

Furthermore, we expect all our suppliers and partners to comply with SAP's [Supplier Code of Conduct](#) and [Partner Code of Conduct](#) and 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 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. 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 Modern Slavery.

SAP Australia also requests its significant suppliers provide additional information regarding modern slavery, including details 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.

Through the contractual terms, suppliers know that they are required to comply with the SAP Supplier Code of Conduct. The Partner Ecosystem Success Organisation and other employees



that recruit new partners and/or work with existing partners are also aware of the contractual terms that all partners are required to know and comply with the SAP Partner Code of Conduct.

Internal Measures to address Modern Slavery Risks

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 also developed a compliance management system for enforcing ethical business conduct. This includes detailed policies and procedures to facilitate SAP to do 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 SAP 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 its 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 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 based on UNESCO's "Recommendation on the Ethics of Artificial Intelligence", **SAP's Global AI Ethics Policy** establishes clear principles to enable the ethical development, deployment, and use of AI systems. These principles emphasise fairness, transparency, privacy, safety, and sustainability, among other core values. To check that SAP's AI systems adhere to the ethical standards set in the policy, clear governance processes are in place and orchestrated by SAP's AI Ethics Office. This includes the Global AI Ethics Steering Committee, which oversees internal implementation, and the external Global AI Ethics Advisory Panel, which provides an outside-in perspective to enhance policies and decision-making.



Mandatory AI Ethics Policy training was launched for employees in 2024 to be completed in 2025.

Training

SAP's Global Code of Ethics and Business Conduct for Employees is only effective when it is properly implemented by the organisation, and when employees are both aware of it and adhere to its principles. That is why we strive to make sure all our employees receive training on the standards that we expect.

SAP has a thorough mandatory compliance training programme 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. In 2024, the confirmation rate for the Code in Australia stood at 100%. 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.

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.

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.

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.

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.

Remediation

Actions taken by SAP Australia to assess and address modern slavery risks include:

- maintaining a policy requiring suppliers to 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 implementing a questionnaire for completion by SAP Australia’s significant suppliers. SAP Australia will take appropriate steps to address any adverse findings.
- raising awareness among SAP employees about policies (e.g. Global Code of Ethics and Business Conduct) during both onboarding session and refresher training sessions.

If SAP Australia identifies that an existing supplier does not comply with Modern Slavery Legislation or Labour Hire Licensing Laws, we are committed to working with affected people or their representatives in providing remedy for negative human rights impacts and expect this from our suppliers too. Within our own operations, all relevant teams and individuals would coordinate to take both immediate and long-term actions to address violations and prevent their recurrence. For violations within the supply chain, SAP would engage with suppliers and business partners through a dialogue-based approach, leveraging our influence to end the violations. SAP Australia may terminate the Supplier’s services agreement or take other appropriate steps.

Effectiveness Assessment

SAP employs a comprehensive, multi-layered approach to assess the effectiveness of its preventive, remedial, and due diligence measures to check 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 Human Rights Commitment Statement. SAP has developed an internal Effectiveness Review concept based on recommendation of the German Office for Economic Affairs and Export Control. The process is comprehensive, covering multiple areas and using both qualitative and quantitative methods to enable robust evaluation. The effectiveness of due diligence obligations is reviewed at least annually and additionally on an ad hoc basis when certain circumstances arise, such as significant changes in risk or business operations.



The review covers all key areas of the risk management system, aligned with regulatory requirements and public reporting standards.

The following areas are being reviewed for appropriateness and effectiveness:

- Resources and expertise
- Risk analysis and prioritisation process
- Preventive measures
- Remedial measures
- Complaints Procedure
- Documentation

For each area, the review examines specific criteria, for example:

- **Resources and Expertise:** Whether relevant business processes are identified, responsibilities are assigned and documented, adequate resources and skills are available, and the Human Rights Officer has sufficient independence and access to information.
- **Risk Analysis:** Whether risk analyses are conducted regularly and ad hoc, all relevant risks are covered, appropriate information and stakeholders are involved, and risks are prioritised transparently and systematically.
- **Preventive and Remedial Measures:** Whether measures are implemented for each prioritised risk, their effectiveness is evaluated, and whether affected stakeholders are involved in designing these measures.
- **Complaints Procedure:** Whether the procedure is accessible, impartial, confidential, and protects against retaliation, and whether it is aligned with recognised international standards (UNGP criteria).
- **Documentation:** Whether due diligence activities are continuously documented, stored securely for at least seven years, and whether documentation guidelines are regularly updated.

Throughout all processes SAP uses a standardised questionnaire, quantitative scoring, and qualitative explanations to help ensure a transparent, traceable, and actionable evaluation process. This approach enables continuous improvement and compliance with legal and regulatory requirements.



This statement was approved by the board of SAP Australia Pty Ltd effective 30 June 2025.

Signature:

DocuSigned by:
Angela Colantuno
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Name: Angela Colantuno

Title: ANZ MD

Date: June 17, 2025