

SAP Global People Compliance and Antidiscrimination Statement

SAP's core principles, culture and values set a foundation of an inclusive and diverse work environment where dignified, respectful working relationships are a matter of course. Free from any form of discrimination or harassment, our foundation is embedded in our Code of Business Conduct and our global SAP People Compliance and Antidiscrimination Policy. SAP values are cast in the Code of Business Conduct. The CoBC is the basis for SAP Human Capital Management, because employees are our most valuable and greatest asset.

1. SAP's Values & Leadership:

At SAP, our purpose is to help the world run better and improve people's lives. This is equally true for us in our working environment and equally expected from our partners, customers and for our employees. We strive for sustainable growth while protecting our environment. We make every effort as we believe, to foster diverse and inclusive culture at SAP where every employee is valued and respected precisely due to our different perspectives and diverse characteristics. Therefore, we are respectful and inclusive to our people and our stakeholders, always aiming to make a positive impact



on those societies in which we work. Our commitment and priority are to be respectful, professional, compliant, inclusive, healthy and bias-free. We value each other's integrity, dignity, rights, health and well-being. This is our foundation to create a harmonious, creative and motivating work environment where everyone can run as its best,

spark innovation and drive customer success. Our values are deeply embedded in our daily business as well as in all our policies such as demonstrated in our commitment to the Human Rights included in SAP's Global Human Rights Commitment Statement, SAP's Supplier Code of Conduct, People Compliance and Antidiscrimination Policy and Code of Business Conduct. By making the right choices, based on business and people related compliance, we build trust with our people and stakeholders. With that we enable us to fulfill our purpose and promise to help the world run better and improve people's lives. Therefore, we bind ourselves to a workplace free from any form of discrimination and harassment as described in SAP's Global People Compliance and Antidiscrimination Policy owned by SAP Global People Compliance and Antidiscrimination Office.

2. SAP's Global People Compliance and Antidiscrimination Policy

At SAP the Global People Compliance and Antidiscrimination Office invented, designed and implemented SAP's Global People Compliance and Antidiscrimination Policy as our promise and commitment to treat everyone equally with dignity and respect. Our aim with this policy is to build a solid foundation to protect our employees, our work environment and our culture. In addition, the policy is our foundation to actively define what we don't tolerate while fostering a work environment in accordance with our values. Our requirement to all our employees is to live by our policy and ensure they fully understand their obligations to respect our values, each other and to comply with

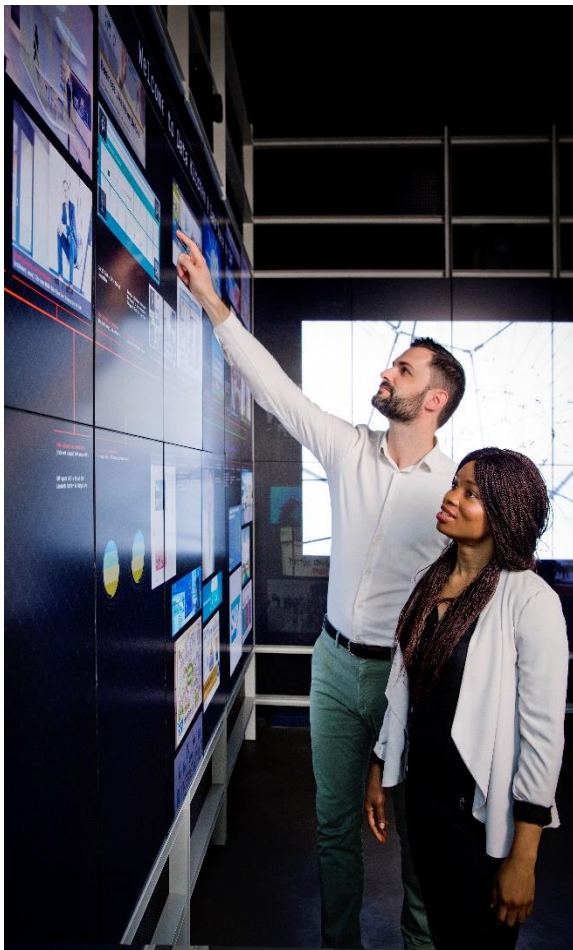


this policy. The policy itself contains definitions of discrimination and any form of harassment like sexual harassment and psychological harassment including bullying or mobbing. SAP requests from anyone to report any concern regarding discrimination and harassment inconsistent with our policy. Therefore, we implemented multiple channels

to report possible policy breaches. Our People Compliance Office is very explicit to address our expectation towards managers and their obligation to report potential inconsistent behavior regarding SAP's Global People Compliance and Antidiscrimination Policy. Part of this policy is SAP's commitment to non-retaliation. Every employee can rest assure that reporting a concern in good faith or participating in an investigation will not lead to retaliation. Global People Compliance Office's policy applies to all employees and to all work-related settings, including both in the office and outside the office, such as during business trips and business-related social events, or any form of communication (such as but not limited to email, mail, phone). And finally, in case a behavior inconsistent with the policy occurs appropriate actions through consequence management will be taken by responsible SAP representatives, as part of the global investigation process.

3. Global People Compliance and Antidiscrimination Office

The Global People Compliance and Antidiscrimination Office is responsible for the People Compliance and Antidiscrimination Policy, in a globally rolled out investigation process. The Global People Compliance and Antidiscrimination Office is represented by the People Compliance Officers. The main tasks of People Compliance Officers are to safeguard the Antidiscrimination policy, taking care of reported concerns by conducting investigations, run meta-level trend analysis to proactively take precautions, identify any trends, identify directions and take appropriate action at an early stage which is an instrument of prevention against discrimination and harassment. In this regard our People Compliance Officers also conduct awareness sessions globally to raise awareness about individual behavior in the context of discrimination and harassment. People Compliance is globally present, and our goal is to be globally active because we live our culture at SAP. To ensure this and to be able to do objective and unbiased work and investigations in case of possible misbehavior, we have also



implemented the role of the People Compliance Investigator who lead our investigations. People Compliance Investigators are SAP employees who are trained in an intensive, comprehensive and high-quality in-house training program. The training program -if passed- is completed with an official certification. That means we have a community of highly trained and licensed investigators. The fact that we conduct this training in-house and that it is led by our People Compliance officers ensures highest quality. High standards and quality assurance are very important to us in all areas. We also implemented a global investigation process which is followed by each of our investigators. During the investigation they conduct interviews by using our interview technique, gather information, write reports and come to conclusions and recommendations if required and legally applicable. Through Investigators we ensure regional risk accountability and local responsibility. In addition to our local Investigators who take care about reported concerns we established central contact persons

known as People Compliance Ambassadors who raise awareness to People Compliance topics and which serve as the first point of contact for all employees who feel the necessity to discuss a difficult personal situation to ensure easy and quick accessibility to our Global People Compliance organization.

4. Our global People Compliance Investigation Process

Our investigation process can be divided into several steps, starting with the People Compliance Office receiving a concern through one of our reporting channels. We offer our employees multiple confidential channels to report possible misbehavior, like for example: Speak Out (Whistleblower tool with anonymous reporting option) and the SAP Global People Compliance Office inbox (PeopleCompliance@sap.com). Once an incident or possible misbehavior is reported, Global People Compliance Office is obliged to intake and analyze the situation. Our People Compliance office then decides whether the reported complaint is their area of responsibility or the situation needs to be transferred to another responsible office if possible.

If the reported concern is a potential People Compliance issue the globally implemented investigation process starts. This means a People Compliance Officer or certified investigator in the region investigates on circumstances that are reported, conduct objective and impartial investigations about the situation, and comes to a conclusion and in case of inappropriate behavior to mitigation recommendation if legally applicable. Only in case of inappropriate behavior detected the case will be handed over to the responsible business manager and HR representative to go from here to start the legal process. Every investigator is trained to uphold our highest values in every investigation and to communicate them clearly to the persons involved. This includes ensuring that every investigation is conducted with the highest level of confidentiality (on a need-to-know basis). Only necessary information will be disclosed to persons where it is indispensable for the processing of the case. In addition, the People Compliance office has a strong non-retaliation policy, which means that any retaliation of a complaint reported in good faith, regardless of the outcome of the investigation, is strictly prohibited.

5. Conclusion

Our Antidiscrimination Statement is a manifestation of SAP's commitment towards the universal human rights. We affirm our long-term dedication to providing advocacy and thought leadership on topics like inclusion, diversity, and personal and individual free evovement - values we live by at SAP.

Our organization serves the highest standards, which we guarantee through our willingness to learn and our consistent challenge towards ourselves. We are confident that the combination of our values, our People Compliance and Antidiscrimination policy and how we support our employees allows us to deliver on our promise, to innovate our customers, our employees, and our partners to run at their best and to help the world run better and improve people's lives.

