

Response to Business & Human Rights Resource Center Due Diligence Survey

Thank you for inviting us to respond to your survey regarding SAP's measures to address human rights risks related to the ongoing war in Ukraine.

As a signatory of the UN Global Compact since 2000, SAP believes companies have a responsibility to respect human rights. SAP is committed to respecting and promoting human rights across our operations, extended supply chain, and product lifecycle. We take guidance from the United Nations' Guiding Principles on Business and Human Rights to integrate human rights considerations into our business practices. We maintain a range of policies including our [Global Human Rights Commitment Statement](#) and procedures designed to ensure that we treat everyone with respect and to include actions to mitigate the risk of forced labor, modern slavery, human trafficking, or other salient human rights risks occurring in our own business or along the value chain. We also expect all of our business partners to respect human rights and avoid complicity in any abuse. In SAP's Integrated Report we [disclose](#) our due diligence, governance, guidelines and how we assess and manage human rights measures.

Russia's ongoing unjustified war is a heartbreaking display of brutality and a violation of the fundamental principle of freedom that we share with Ukraine. We oppose this war and remain steadfast in our commitment to support Ukraine by stopping all sales and shutting down cloud operations in Russia, fully implementing international sanctions, and donating both technology and humanitarian aid.

The safety and protection of our colleagues in the region is of the utmost importance and our thoughts are with our colleagues, their friends and families who are affected. The SAP Ukraine office will be closed until further notice. SAP urges all employees in Ukraine to put personal safety above everything else. As our CEO Christian Klein discussed with Vice Prime Minister of Ukraine, Mykhailo Fedorov, SAP is planning to open a Research and Development center in Ukraine after the war. For colleagues who chose to leave Ukraine, we provide financial and logistical support in neighboring countries.

On March 2, we stopped all sales in Russia and then Belarus. We have immediately implemented all international sanctions without exception and are in constant contact with our government counterparts to remain aligned with their strategies to end this war. We appreciate the resolve and intelligence with which governments have come together on coordinated sanctions and welcome the announcement of new international sanctions expected soon. Beyond implementing sanctions and stopping all sales, we are actively shutting down our cloud operations in Russia. We have received questions about SAP's ability to shut down all existing products for Russian customers. There are customers in Russia that have bought and deployed their SAP products on premise and run these products within their own internal IT departments. This means that regardless of any SAP decision not to provide support or engagement of any kind, these customers are still able to continue using these products independently of SAP.

On April 19, we announced further steps toward an orderly exit from our operations in Russia, where we have operated for more than 30 years and have built an excellent team. As we wind down our operations, we will focus on responsibly managing the impact on these employees.

As part of our cloud shutdown, we have given non-sanctioned companies in Russia the choice to have their data deleted, sent to them, or migrated to a data center outside of Russia, since the data in data centers belongs to customers, not to SAP. For those Russian companies who choose the migration path, we will not renew their contract upon expiration of the current subscription term.

To address the humanitarian and refugee needs on the ground, we are using our technology to help multi-national organizations across a range of aid efforts. One focus is ensuring aid groups and healthcare workers can get supplies. We recently donated SAP Ariba solutions to an NGO working with the State Enterprise Medical Procurement of Ukraine, which will allow the speedy purchasing of medical goods for the Ministry of Healthcare of Ukraine. We also enabled suppliers on SAP Business Network to declare their readiness to provide humanitarian aid to Ukraine. Some 2,500 companies have already taken this opportunity and offered their assistance through the platform.

Technology is just one of the resources we're offering. Total donations from SAP and our employees have surpassed €3.7 million and continue to grow. Over 4,000 employees have offered housing and other aid to refugees. We're also providing SAP office space to store donations such as medicine and food. Furthermore, employees who wish to provide assistance connected to the humanitarian situation in Ukraine will be granted up to three additional days of leave.

Most recently, SAP has launched a recruitment program to match refugees from Ukraine with job opportunities. The initiative aims to attract, match and retain qualified refugees from Ukraine with suitable job opportunities at SAP in Germany, the Czech Republic, Hungary, Bulgaria, Romania, Poland and Slovakia. Interested talents can easily register in a Talent Pool and be matched with suitable vacancies by the Talent Pool Champions. To help talent get started at SAP, we offer a special onboarding program.

We continue to closely monitor the situation and constantly assess the need to adjust or initiate additional measures, while following our enhanced processes regarding crisis response as well as thorough compliance assessments and due diligences, including human rights.

At SAP, we respect and support the values of the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work by integrating human rights considerations into our standard business practices. This applies especially now as we stand with the global community in its efforts to stop this unjust war in Ukraine and restore peace.