

SUSE Modern Slavery Statement



Introduction

This Statement constitutes the Modern Slavery Statement for SUSE S.A. and its subsidiaries (“SUSE” or the “Company”) for the financial year ended 31 October 2023 (the “reporting period”).

SUSE is committed to respecting human rights across its value chain, from its own employees to its suppliers and business partners and to the communities in which it operates. Child labour, human trafficking, and illegal, abusive or forced labour have no place in SUSE’s operations or in the operations of SUSE’s suppliers or business partners. SUSE opposes human trafficking, forced labour and all other forms of modern slavery.

Structure, Business and Supply Chain

Structure

SUSE S.A. is a Luxembourg incorporated company with over 40 subsidiaries in more than 30 countries and over 2,000 employees located across the world. More information about SUSE, its products, customers and its employees can be found at <https://www.suse.com>.

Business

SUSE is a global leader in innovative, reliable and secure enterprise open source solutions, including SUSE Linux Enterprise (SLE), Rancher and NeuVector. More than 60% of the Fortune 500 rely on SUSE to power their mission-critical workloads, enabling them to innovate everywhere – from the data centre to the cloud, to the edge and beyond. SUSE puts the “open” back in open source, collaborating with partners and communities to give customers the agility to tackle innovation challenges today and the freedom to evolve their strategy and solutions tomorrow.

Supply Chain

SUSE does not manufacture physical goods or have others do so for sale on its behalf. SUSE’s supply chain is limited and consists of goods and services procured to operate its business and enable its employees to deliver its services.

SUSE purchases goods and services from a wide range of suppliers in different sectors and geographies. As set out in this Statement, SUSE believes that the nature of its business and its supply chain limits the risks arising from modern slavery.

Risks of Modern Slavery Practices in SUSE's Business and Supply Chain

Business

SUSE considers the risks of modern slavery in its business to be relatively low. Employees are hired following a detailed recruitment and interview process and employed on the basis of an employment contract and/or offer letter.

The majority of SUSE's employees are skilled workers in the engineering, sales, support, product, HR and General & Administrative functions. In light of this, SUSE believes that the risk of modern slavery practices affecting its workforce to be low. SUSE is committed to providing a work environment of inclusion where all employees are treated with dignity and respect and has a number of global policies and processes in place, including the Global Anti-Harassment and Anti-Bullying Policy and the Diversity, Inclusion and Equal Opportunity Policy.

Supply Chain

SUSE considers the risks of modern slavery in the production of its products and the provision of its services to be relatively low because SUSE does not manufacture hardware in factories.

However, SUSE recognises that there is a higher risk of modern slavery within certain areas of its supply chain, in particular in areas which traditionally attract a greater risk, such as food, hospitality, building services (e.g. cleaning), construction and technology hardware. These risks will be heightened for suppliers in high-risk geographies. SUSE aims to mitigate these risks through the policies and measures set out in this Statement.

Actions taken to assess and address modern slavery risks

SUSE's risk management function is centrally managed and rolled out on a global basis, where appropriate. This results in a cohesive approach to compliance with applicable laws and regulations in the countries where SUSE does business around the world.

The following section sets out a summary of the actions that SUSE has taken to assess and manage the risk of modern slavery and human trafficking in SUSE's business and supply chain.

Global Policies and Standards

SUSE Supplier Code of Business Ethics

SUSE's Supplier Code of Business Ethics ("SCOBE") is designed to ensure that SUSE's suppliers meet their legal and ethical obligations. SUSE expects that its suppliers will comply with its SCOBE and comply with all laws and regulations of the countries in which they operate, in particular laws that relate to anti-corruption, anti-slavery and anti-child labour, or have their own commitment to ethics and integrity which is consistent with SUSE's. SUSE's SCOBE is published on its website.

SUSE is committed to working with suppliers that actively demonstrate their respect of human rights, including through following guidelines and activities that support the prohibition of forced labour, modern slavery or child labour.

Code of Business Ethics

SUSE's Code of Business Ethics ("COBE") is the foundation of SUSE's compliance programme and clearly sets out to all SUSE's employees the requirement to adhere to high ethical standards and comply with all laws and regulations that are applicable to SUSE's business. The COBE applies worldwide to all SUSE employees and outlines SUSE's commitment to respecting human rights across its value chain, from its own employees to its suppliers and business partners and to the communities in which it operates.

The COBE asks SUSE employees to follow four steps when faced with ethical dilemmas:

(i) pause when a situation makes an employee feel uneasy, (ii) reflect on the proposed approach whether the approach is consistent with SUSE's culture, values and the COBE, (iii) ask additional questions and get help where necessary and (iv) report concerns and stay alert. SUSE has a Speaking Up Policy that sets out the process that SUSE employees should go through if they want to raise concerns, including use of a confidential reporting hotline.

Employee Training

Training on the COBE was launched in 2021 and completion of the training is mandatory for all SUSE employees. The training will be refreshed and republished in 2024 for all SUSE employees and will again be mandatory for all SUSE employees. All SUSE employees are required to complete training and abide by the COBE when they join SUSE.

As part of the mandatory COBE training, all employees are required to certify that they have completed the COBE training, understand the requirements set out in the COBE and agree to comply with all of the requirements of the COBE.

All commission based employees in external sales facing roles, are required to attest to their compliance with policies and procedures, including COBE, on a quarterly basis.

In addition to training on the COBE, SUSE has an annual training programme that includes training on Anti-Bribery and Anti-Corruption, as well as other HR and health and safety training.

Partner Code of Conduct

SUSE's Partner Code of Business Ethics sets out the standards of business conduct and ethics that SUSE expects from its partners so that partners are aware of and comply with their legal obligations in relation to the conduct of their business. SUSE expects its partners to maintain the highest standards of business ethics and to be familiar with and comply with all laws that are relevant to their status as SUSE partners.

Due Diligence

Employee training

COBE training is mandatory for all SUSE employees and this training includes employees certifying that they understand the requirements set out in the COBE and that they agree to comply with all of the requirements of the COBE.

Reporting

SUSE's Speaking Up Policy encourages SUSE employees, customers, partners and members of its developer communities to report any actual or suspect wrongdoing by fellow SUSE employees, business partners or suppliers. The Speaking Up Policy sets out how concerns can be raised and the process for dealing with a concern. Anyone who wishes to raise a concern has access to an independent, confidential and external reporting service called Safecall which is monitored 24/7, 365 days a year. SUSE encourages openness and supports employees who raise genuine concerns, even if they turn out to be mistaken. SUSE employees will not be subject to disciplinary or retaliatory action solely as a result of making a good faith report of a violation or potential violation.

SUSE's Speaking Up Policy is published on its website [here](#).

Effectiveness

SUSE reviews the content of its training materials, the completion rate of employee training and its reporting channels, including its independent, confidential and external reporting service, to assess the effectiveness of its modern slavery and human trafficking controls. SUSE also carries out risk assessments on the threat of modern slavery and human trafficking affecting its business and will adapt its controls as these threats evolve.



UK Modern Slavery Act

SUSE Group UK Limited and SUSE Software Solutions UK Ltd are required to publish a modern slavery statement pursuant to the Modern Slavery Act 2015. SUSE Group International Holdings Limited is not required to publish a modern slavery statement pursuant to the Modern Slavery Act 2015 but has chosen to do so on a voluntary basis. SUSE Group UK Limited is a wholly owned subsidiary of SUSE S.A., which is headquartered in Luxembourg. SUSE Software Solutions UK Ltd is an indirect wholly owned subsidiary of SUSE Group UK Limited. SUSE Group International Holdings Limited is a wholly owned subsidiary of SUSE Group UK Limited.

For the purposes of compliance with the Modern Slavery Act, this Statement was reviewed and approved by the Board of Directors of SUSE Group UK Limited, SUSE Software Solutions UK Ltd and SUSE Group International Holdings Limited and is signed on behalf of the Board of Directors of SUSE Group UK Limited, SUSE Software Solutions UK Ltd and SUSE Group International Holdings Limited.

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David Hughes

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