

Speak Up SAS France

SAS has a global procedure for reporting and responding to concerns. As an employee of a SAS EU entity, you have additional avenues for reporting concerns at the local entity level. The purpose of this document is to provide you with further information about SAS' Global Speak Up process and any local reporting channels which may be available to you.

Speak Up SAS Global Program

At SAS, we work hard to build an environment that fosters trust and creativity at all levels of our business. We also strive to meet the highest ethical standards of behavior in our relationships with employees, customers, and business partners. The commitment is vital to creating the best working environment for all.

SAS believes in doing the right thing – as a company and through its employees. The [SAS Code of Ethics](#) outlines the core values that we share and was created to help provide guidance with resources to navigate potential challenges. The [SAS Business Partner Code of Conduct](#) also reflects SAS' commitment to the highest standards of ethical conduct as well as social and environmental responsibilities and expects our business partners to share our values. **We encourage all individuals to never be afraid to ask questions or raise concerns. Everyone should trust their judgment; if they think something is wrong, they should speak up.**

Confidentiality

We make reasonable efforts to only share reported information with SAS resources who have a need to know the information in order to properly investigate the report. If required by law, the information will be shared with government officials.

No Retaliation

SAS understands that it can be difficult to speak up, especially when something may be wrong. We will not retaliate against anyone who speaks up, in good faith, to report their concerns about a possible violation of the Code, SAS policies, or the law. If an employee believes they are suffering from retaliation, they should follow one of the reporting avenues described herein or contained within SAS' internal No Reprisal, Retaliation, or Victimization Policy.

Ways to Report Globally

Electronic Mail	AskCompliance@sas.com
Telephone (toll-free in US and Canada)	1-866-680-7122
Post Mail	SAS Compliance Department Attn: Vice President and General Counsel – Ethics and Compliance SAS Campus Drive Cary, NC 27513 USA
*SAS employees can also visit the Speak Up SAS Internal Page	

Speak Up SAS France Program

Employees of SAS' French legal entity may also be able to report their concerns through a Local Reporting Channel. In principle, your concern will be investigated locally if the matter is purely of local concern. However, if the issue you raise is one that is more appropriately investigated by SAS' global headquarters investigations team (which includes members from a cross-functional set of resources from Ethics and Compliance, Finance, Human Resources, and Security who investigate claims regularly), such as an allegation which spans multiple countries and/or has wider legal and regulatory implications which are better handled with global oversight, your Local Reporting Channel contact will reach out to you to discuss this.

The objective of this French whistleblower procedure is to provide employees and collaborators with an additional means to raise concerns.

Guidance for Reporters

The following concerns can be reported to the Local Reporting Channel by employees and collaborators of SAS France, based on information gained in the context of their professional activities:

- Crime, criminal offense, or illegal acta threat or serious prejudice for general public interest
- A violation nor an attempt to conceal a violation of:
 - an international commitment duly ratified and approved by France and of the unilateral act of an international organization based on such commitment
- A European Union law
- A French law or regulation
- Ethical, social, or environmental principles and rules of the company, applicable to such matters, for example, discrimination and harassment; health, hygiene, and security/safety at work; protection of the environment; human rights, etc.
- Any breach of SAS' Code of Ethics or any situation potentially contrary to the Code of Ethics, such as:
 - active or passive corruption



- influence peddling, misappropriation, illegal taking of interest, embezzlement of public funds, patronage
- competition rules and obligations
- conflicts of interest
- accounting and financial wrongdoing

Examples of concerns that are excluded:

- Facts, information or documents covered by national defense and attorney/client or physician/patient confidentiality

Who Can Report Concerns:

- All employees, persons whose employment relationship has ended, where the information was obtained in the course of that relationship, and persons who have applied for employment with the entity concerned, where the information was obtained in the course of that application;
- Shareholders, partners and holders of voting rights in the entity's general meeting;
- Members of the administrative, management, or supervisory body;
- External and casual collaborators;
- The entity's co-contractors, their subcontractors or, in the case of legal entities, the members of the administrative, management or supervisory bodies of these co-contractors and subcontractors, as well as the members of their staff.
- Employees and collaborators of SAS France provided such reporting is made without financial advantage to the reporter and is in good faith.

Ways to Report Globally

Even if you have a concern which can be reported under a Local Reporting Channel, you can still report your concern through SAS' Global Speak Up line, the details of which are described above and the communication channels of which are redescrbed below.

Electronic Mail	AskCompliance@sas.com
Telephone (toll-free in US and Canada)	1-866-680-7122
Post Mail	SAS Compliance Department Attn: Vice President and General Counsel – Ethics and Compliance SAS Campus Drive Cary, NC 27513
*SAS employees can also visit the Speak Up SAS Internal Page	

Ways to Report Locally (Local Reporting Channel)

If you would rather use a Local Reporting Channel, you may do so as follows:

In Person Locally	<ul style="list-style-type: none"> To a direct or indirect supervisor, who will be able to provide advice and guidance (unless supervisor is the subject of the reporting) To the local compliance contact for France (“Réfèrent” under the Loi Ssapin II). Stephanie Gabon is appointed as the “go-to person” or Réfèrent for purposes of this procedure or any matter of anticorruption. The Réfèrent will coordinate with SAS’ global investigation team who will review any reports pursuant to the global process for reviewing such matters. ·
Local Electronic Mail	SpeakUpFrance@sas.com

The Local Reporting Channel is established in application of the French legal provisions, in particular Law n°2016-1691, dated December 9, 2016, commonly referred to as “Sapin II”, taken in its entirety (and more specifically, articles 6 *et seq.* and 17 II-2°) and Law n° 2022-401 dated March 21, 2022, commonly referred to as “Waserman”, and their implementing instruments (in particular the decree n° 2022-1284 dated of March 21, 2022 hereafter the Decree). This procedure compliments the existing global procedure in place, and in case of discrepancy, the French procedure shall prevail in France.

As a reporter, you may be entitled to various aspects of legal protection provided for in this legislation, regarding protection against retaliation. For more details, speak to your Local Reporting Channel.

What To Expect After Reporting a Concern

Upon receiving a report, Legal Ethics and Compliance group follows an investigation protocol, completing a review and investigation (as appropriate) within a reasonable time frame given the nature of the allegations and the initial information provided. The investigation protocol includes the following steps:

- Acknowledging receipt of the report in writing within 7 working days of its receipt. Such acknowledgment of receipt does not entail admissibility of the report; acknowledgment will indicate the foreseeable period necessary in order to process the report as well as the procedures according to which he/she will be informed of the follow-up given.
- Report Assessment: Legal Ethics & Compliance
 - reviews the report,
 - collects sufficient information to identify the SAS policies or the regulation at issue,
 - determines whether a preliminary review is needed, including whether the report is unfounded (i.e., there are insufficient facts provided and no means to gather sufficient facts to review or determine whether a SAS policy (including prohibitions on legal or regulatory violations) has been violated), and
 - identifies the appropriate business unit to conduct a preliminary review

- Plan of Action: Compliance may partner with Human Resources and other departments to form a plan of action and assign the report to an investigation team.
- Investigate: The investigation team compiles information about the report, conducts interviews, collects documents, and reviews implicated SAS policies.
- Review: All information is reviewed, and a determination is made whether the report is:
 - Substantiated/Unsubstantiated
 - A report is substantiated if the evidence collected shows that it is more likely than not the report is true.
 - A report is unsubstantiated if there is not sufficient evidence to establish a policy violation or that misconduct occurred.
 - Unfounded (i.e., insufficient information to provide a basis for and to warrant an investigation)

The report will be reviewed within a reasonable time frame, and if an initial claim is substantiated and an additional investigation is warranted, such investigation will begin within a reasonable time following such finding, and appropriate follow-up action is taken.

- Completion: The reporter is notified when the review is complete.

In any case, the reporter is notified within a reasonable period of time not exceeding three months from the acknowledgement of receipt of the report with written information on the measures envisaged or taken to assess the accuracy of the allegations and, where appropriate, to remedy the subject matter of the report, as well as the reasons for such measures.

- SAS will follow the same Confidentiality described above: In particular,
 - The whistleblower should identify himself/herself, it being specified and guaranteed however that his/her identity will be kept confidential in accordance with applicable local rules and especially those applicable to personal data processing.
 - Thus, SAS' employees and collaborators making use of this procedure are being guaranteed that all appropriate precautions have been taken in order for their identity to remain strictly confidential at all stages of the review and processing of their report, towards any and all SAS staff as well as third parties (with the exception of judicial authorities).
 - Their identity will, for example, never be disclosed to any individual likely to be affected by an investigation or to be the subject of such an investigation; even if that person requests such disclosure.
 - By the same token, facts and/or events which are the subject matter of the report, documents and elements forwarded, as well as individuals who are the subject matter of the report will enjoy the same confidentiality under the same conditions as long as the investigation of the report will be under way and as long as the merit of the report has not yet been established.
 - Anyone due to receive and/or process whistleblowing reports must have signed and be bound by a non-disclosure agreement or clause.
- SAS will follow the same No Retaliation provisions described above. In particular, the author of any report made in good faith shall not be retaliated against, even if unsupported and if the respective facts are not proven. On the contrary, any misuse of the whistleblowing system may result in the taking of disciplinary and/or judicial action against its author.

What Else Should I Consider

When you submit a report, particularly if you do so anonymously, please provide as much information as possible, including:

- a specific description of the issue,
- names of individuals who may have additional information,
- specific examples and descriptions of behaviors or events that cause you concern,
- location of any documents or other information that will help us review the report, and
- any other relevant information.

The company will ensure the adequacy, relevance and proportionality of collected data in relation to the purpose for which it is collected.

How To Report Concerns to a Competent External Authority

While we hope that you feel comfortable reporting your concerns through either SAS' Global Speak Up line or through the Local Reporting Channel, employees and collaborators of SAS France may also report externally, either after having made an internal report under the conditions provided above, or directly:

- To the competent authority listed in the annex of the Decree;
- To the Defender of Rights, who will direct the person to the authority or authorities best placed to deal with the matter;
- To the judicial authority;
- To an institution, body or agency of the European Union competent to collect information on violations falling within the scope of the Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019.

The relevant modalities for external reporting can be found on the websites of these relevant competent authorities.

Who Should I Contact if I Have any Questions about the EU Whistleblower Directive

Please contact AskCompliance@sas.com or the Local Reporting Channel if you have any questions or concerns about the EU Whistleblower Directive or what it means for you.

Data processing and storage

Data relating to alerts and in particular personal data relating to individuals shall be destroyed, kept, or archived in accordance with applicable legislation.

- Any and all data relating to an alert falling outside of the scope of application of the present procedure shall be immediately archived or destroyed.
- Should the investigation be closed without the opening of a disciplinary or judicial procedure, any and all data relating to the alert shall be destroyed or archived within two months of the completion of the audit process; a confirmation to this effect shall be provided to the whistleblower as well as to the person forming the subject matter of the alert.



- Should a disciplinary or judicial action be taken against the subject of the reporting and alert or the author of an abusive alert, any and all data relating to the alert shall be retained until the final closure of the procedure, then shall be destroyed or archived.
- In any case, following the appropriate statute of limitations, the records will be destroyed.

Any individual whose personal data has been processed within this framework shall be entitled to exercise his/her rights, within the limits set by such procedure, before privacyrights@sas.com.

Other

Total compliance with this procedure will allow the author of the report to benefit from the whistleblower protection afforded by French law.

A prior information and consultation of the relevant employees' representative bodies has taken place.

Any misuse of the whistleblowing procedure by an employee could expose him/her to disciplinary sanctions and/or prosecution; on the contrary, a whistleblower's reporting made in good faith won't expose him/her to disciplinary sanctions and/or prosecution even if, after having been processed and investigated, it appears to be unfounded or groundless.