



Business Partner Code of Conduct



SAS Institute Inc. ("SAS") is committed to the highest standards of ethical conduct as well as social and environmental responsibilities and expects our Business Partners to share our values. A Business Partner is any supplier, vendor, or any consultant, subcontractor, reseller or other third-party representative acting on SAS' behalf or conducting business with SAS, including, without limitation, any person or entity engaged to sell, resell or assist in selling or reselling, any SAS® products or services in exchange for a fee, commission or other compensation. Our Business Partners, along with their affiliates and subcontractors, must have a management system in place commensurate with the size and nature of their business to meet these requirements and communicate this message throughout their supply chains. If a Business Partner fails to maintain an effective management system SAS may terminate its relationship with Business Partner. Business Partners must abide by all applicable laws and regulations and maintain a Code of Ethics that sets forth principles and requirements consistent with the [SAS Code of Ethics](#).

Before and during our relationship, SAS may request information and perform evaluations to ensure Business Partners meet SAS' ethical standards and are complying with this Code of Conduct.



Ethics

SAS expects Business Partners to conduct all aspects of its business operations in a professional and ethical manner.

- **Business Integrity.** Business Partners will abide by all applicable anti-corruption and competition laws and regulations in the countries in which it operates including, but not limited to, laws enacted pursuant to the International Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the United States Foreign Corrupt Practices Act and the United Kingdom Anti-Bribery Act. Business Partner shall not, either directly or through any other person, offer, give, promise to give or authorize the giving of money, loans, employment, favors, gifts or anything of value to anyone for the purpose of obtaining or retaining business or securing any improper advantage. Business Partner will not engage in any other acts of corruption, extortion, embezzlement, bribery, money laundering, the improper exchange of competitive information, price fixing, bid rigging or improper market allocation.
- **Trade Laws.** SAS products and services are subject to United States origin and United States export laws, including sanctions and embargoes, apply to the distribution, use and access of all SAS products and services. When using, distributing, selling or reselling SAS products or services, Business Partners will understand and abide by such United States export laws and, to the extent not prohibited or penalized by United States law, all other applicable export, import and customs laws.
- **Conflict Minerals.** Business Partners are expected to take steps to determine if its products contain conflict minerals and, if so, to implement policies to identify sources of these minerals and support efforts to eradicate the use of conflict minerals. Business Partners must disclose the presence of any conflict minerals in any products supplied to SAS.
- **Disclosure of Information and Information Security.** Business Partners must respect intellectual property rights and protect SAS and customer information. Business Partners are expected to take technical and organizational measures necessary to safeguard and protect confidential information from misuse or unauthorized disclosure.
- **Privacy.** Business Partners engaged in processing of data that relates to identifiable individuals (“personal data”) are expected to comply with all applicable laws relating to the privacy and security of personal data, to respect the privacy of the individuals whose data they process, and to embrace the principles of privacy by design and by default in their operations.
- **Taxes.** Business Partners will abide by all applicable tax laws and will not engage in or facilitate any activities, either by business partner, other corporations or individuals, which result in the illegal or fraudulent avoidance of taxes under applicable tax laws.
- **Whistleblower Protection/Anonymous Complaints.** Business Partners must provide an environment that allows employees to raise concerns without fear of retaliation. Business Partners must provide employees the ability to anonymously file complaints or discuss workplace issues without fear of retaliation.
- **Reporting a Violation.** Business Partners should report any conduct by SAS employees or other SAS Business Partners that violates this Code of Conduct. See Questions and Reporting.



Environmental

SAS is committed to operating our business in an environmentally friendly manner. Business Partners are expected to be committed to environmental improvement by developing, implementing and maintaining responsible, sustainable business practices. Business Partners must abide by the [SAS Sustainable Procurement Charter](#).

- **Environmental Regulations and Permits.** Business Partners must comply with all applicable laws, regulations and permits related to noise management, emissions control, wastewater management, storm water management, toxic substances, and hazardous and non-hazardous waste generation and disposal. In manufacturing operations, adverse effects on the community, environment and natural resources should be minimized while safeguarding the health and safety of the public.
- **Waste Reduction.** Business Partners must consider environmental impact in the supply chain through conserving resources, minimizing waste and maximizing local sourcing.



Health and Safety

The health, safety and well-being of all employees is a priority for SAS. Business Partners must provide and maintain a safe work environment and ensure health and safety practices are integrated into the business

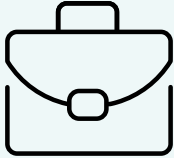
- **Work Environment.** Business Partners must adhere to all applicable workplace health and safety laws and regulations, including, but not limited to, Occupational Health and Safety Administration (OSHA) regulations. Employees should be regularly trained on the health and safety information relevant to the work they perform and must have the right to refuse to work in unhealthy or unsafe working conditions. Business Partners must have a system in place to allow employees to report health and safety incidents as well as a process for investigating, tracking and managing each report.
- **Drug-Free Workplace.** SAS expects our Business Partners to provide a safe, healthy and secure work environment by maintaining a drug-free workplace policy.
- **Emergency Response/Preparedness.** Business Partners must have an emergency preparedness and response program in place designed to minimize harm to life, environment and property.
- **Public Health and COVID-19 Safety.** Business Partner shall ensure that all individuals performing services for SAS on behalf of Business Partner and who enter SAS' property comply with all public health requirements, including those related to COVID-19, as [outlined by SAS](#).



Human Rights/Labor

SAS expects all employees of Business Partners to be treated fairly and ethically, with respect and dignity. Business Partners must respect and uphold the protection of internationally proclaimed human rights and take steps to ensure that they are not complicit in human rights abuses.

- **Human Trafficking.** Business Partners shall ensure that all work is voluntary and in accordance with applicable local law, and that slavery and compulsory labor is not taking place within the supply chain or in any part of the business. Business Partners must be able to certify that materials included in their products comply with the slavery and human trafficking laws of the country or countries in which they do business.
- **Prevention of Underage Labor.** Unless permitted by applicable local law, Business Partners must not employ workers under the age of 15. Workers under the age of 18 may not perform work likely to jeopardize their health, safety, morals or education.
- **Harassment/Abuse.** Business Partners must not subject workers to corporal punishment, physical, sexual, psychological or verbal harassment or abuse.
- **Anti-Discrimination.** Business Partners is expected to support diversity and provide equal opportunity employment in their workplaces. Business Partners must prohibit discrimination based on race, color, gender, nationality, age, disability, union membership, maternity, sexual orientation or marital status, and any other status protected by national or local law.
- **Freedom of Association.** Business Partners must respect employees' rights to join, not join, or form a trade organization for the purpose of collective bargaining and will not discriminate, interfere, retaliate or harass any employee who exercises their right.
- **Compensation/Working Hours/Benefits.** Business Partners must comply with applicable wage and hour labor laws and regulations governing employee compensation and working hours. Business Partners must pay accurate wages in a timely manner and ensure overtime is voluntary.



Management/ Accountability

SAS believes strong management systems are key to ensuring a sound supply chain. Business Partners must be proactive in ensuring the principles of this code are adopted and implemented by their business partners and contractors to the extent applicable.

- **Management System.** Business Partners must adopt or maintain a management system that is designed to ensure compliance with applicable laws, regulations and customer requirements. Business Partners should conform to the principles of this Code of Conduct and make every effort to identify and mitigate operational risks.
- **Records and Documentation.** Business Partners must maintain an effective records management system to accurately, and without misrepresentation, maintain records on financial accounts, quality reports, time records, expense reports, resumes, information regarding business activities and billing, data management and privacy and security, labor, health and safety, and environmental practices and other records necessary for an effective compliance program appropriate for its line of business.



Questions and Reporting

Any Business Partner may direct questions or comments about this Business Partners Code of Conduct to the SAS Compliance Department at askcompliance@sas.com. This Business Partner Code of Conduct has replaced the Supplier Code of Conduct.

Violations of this Business Partner Code of Conduct can be reported confidentially by any of the options below:

Telephone:

Toll-free at 1-866-680-7122 from the US and Canada

Email:

askcompliance@sas.com

Mail:

SAS Compliance Department
Attn: Vice President and General Counsel - Ethics and Compliance
SAS Campus Drive
Cary, NC 27513