



SAS CORPORATE
SOCIAL RESPONSIBILITY

Governance & Management

Integrity, ethics and compliance



As a good corporate citizen, SAS knows its success depends on upholding high ethical standards in dealings with colleagues, customers, suppliers and competitors. This moral compass also steers SAS' workplace culture, which attracts and retains like-minded employees who perpetuate these high standards.

Guided by its [Code of Ethics](#), SAS is committed to maintaining its reputation as a company that conducts all aspects of the business with the utmost integrity. SAS compliance programs use training, policies, processes and audits to ensure compliance in areas such as anti-corruption, international trade and privacy. SAS expects its business partners to represent SAS with the same commitment to integrity, ethics and compliance and outlines those expectations in its [Business Partner Code of Conduct](#).

These practices have earned SAS its exceptional reputation as an ethical and responsible employer and business partner. As a result, SAS is known as a great place to work, a great company to do business with and a valued community member. SAS' reputation is hard-earned and invaluable, so protecting it with constant diligence remains a top company priority.

Governance Structure

Company Profile

SAS Institute Inc. is a North Carolina corporation that has been privately held since its inception in 1976. Headquartered in Cary, NC, the company operates through functional divisions that include Marketing, Sales, Research and Development, Cloud and Information Services, Finance, Legal, Human Resources and Corporate Services. SAS delivers software and related services to customers throughout the world. Sales activities are conducted primarily through SAS Institute Inc. and its controlled sales subsidiaries in approximately 150 countries. These subsidiaries are grouped into regional sales divisions including the Americas; Europe, Middle East and Africa (EMEA); and Asia Pacific. Additional subsidiaries in the EMEA and Asia Pacific regions are dedicated to research and development activities.

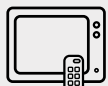
Industries served



Automotive



Health Care



Media



Banking



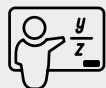
Health Insurance



Energy & Utilities



Capital Markets



Education



Higher Education



Retail



Communications



Hotels



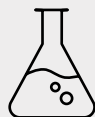
Consumer Goods



Insurance



Defense & Security



Life Sciences



Travel & Transportation



Government



Manufacturing



Sports

CEO Jim Goodnight and co-founder and Executive Vice President John Sall constitute the board of directors of SAS Institute Inc. They also serve as executive officers, overseeing corporate performance and investment decisions across environmental, social and economic interests. Goodnight and Sall are also the company's majority shareholders.

Employee rights, including employment-based compliance issues, are managed through SAS' Human Resources division under the direction of the Executive Vice President and Chief Human Resources Officer. The Ethics and Compliance group in the SAS Legal Division, overseen by the Chief Compliance Officer, manages other compliance responsibilities, including anti-corruption, trade, lobbying, and gifting laws. Additionally, SAS has a Chief Privacy Officer within the SAS Legal Division and a Chief Information Security Officer who oversees an Information Security Office. SAS' organizational resilience efforts are additionally coordinated by a dedicated team within the Legal Division. The SAS Chief Environmental Officer is responsible for ensuring compliance with emerging environmental regulations, collecting data and reporting performance, addressing climate-related risks and opportunities, and providing guidance for incorporating environmental stewardship across operations globally.

Corporate Social Responsibility

SAS maintains a Corporate Social Responsibility (CSR) Task Force comprising employees across business functions including legal, human resources, environmental, facilities, marketing and communications. This group meets bimonthly to advance annual goals and priorities and to address topics related to sustainability throughout the year. The group's function is to ensure the integration of corporate social responsibility efforts across the business. This team works closely with various departments and communicates with SAS executive leadership to ensure that CSR policies and initiatives are considered in all aspects of the business. As a [signatory participant](#), SAS conducts business in accordance with the [Ten Principles of the United Nations](#) (UN) Global Compact and supports the UN Global Compact's [Sustainable Development Goals](#).

Public Policy

SAS understands the importance of proposed laws and regulations and how they could affect our customers, partners, and our company operations. The company works to identify proposed changes in targeted policy areas such as AI, privacy, trade, patents, etc. SAS also may engage in discussions with senior and elected government officials as to how technology can support their efforts to address societal challenges. These challenges may include using analytics to deliver better and safer health care while minimizing fraud, waste and abuse; ensuring that vulnerable children receive appropriate government services; provide quality education; provide better stewardship of taxpayer resources with greater government accountability; and helping governments detect terrorist financing and money laundering. SAS works to educate policymakers on the role and benefits of artificial intelligence, with an end to shaping a workable regulatory framework that encourages its use and development in an ethical manner. Additionally, SAS monitors trade and tax proposals to ensure our operations are in compliance and where appropriate, we will provide comments or feedback to the proposals. The company also works with various associations and nonprofits that engage on policy issues related to clean energy, climate change and societal issues important to SAS' sales and corporate interests. As part of its "Future Ready" initiative, SAS is developing a more robust engagement and review process to ensure the company speaks and engages consistently and appropriately.



Political Contributions and Lobbying

SAS recognizes that an important part of good corporate citizenship is active participation in the political process through various means. While SAS supports its employees in engaging in this process, the decision to do so is entirely voluntary and must be independent of their position at SAS. SAS does not reimburse employees for political donations. Additionally, SAS does not maintain a political action committee (PAC) and does not make corporate political contributions to individual candidates.

SAS engages in the political process through political associations and through lobbying, both of which allow SAS to obtain insight and provide input on relevant public policy developments and to monitor opportunities that allow SAS to bring its products to the public. Political contributions may be made if approved through the Sponsorship, Corporate Membership, Philanthropy & Political Contributions Review Process and in compliance with applicable law and Company policy. SAS records and reports its political contributions in accordance with applicable laws. SAS complies with relevant lobbying laws in its operations and files all accompanying registrations and disclosure reports on a regular and timely basis.

Ethics and Regulatory Compliance

Guided by its [Code of Ethics](#), SAS is committed to maintaining its reputation as a company that conducts all aspects of its business with integrity and reflects ethical practices. SAS compliance programs use training, policies, processes and audits to ensure compliance in areas such as anti-corruption, international trade and privacy.

SAS is committed to demonstrating honesty, fairness and accountability in every decision and action, including each interaction with employees, customers, suppliers and competitors. The SAS Code of Ethics helps the company define and maintain high standards for respect, honesty, fairness and accountability for all without regard to race, color, ethnicity, gender identity or expression, sex, sexual orientation, veteran status, pregnancy, creed, religion, national origin, age, disability, genetic information, marital status, citizenship status, status as a military spouse, or any other legally protected characteristic. SAS recruits, hires, trains, and promotes for all jobs without regard to protected characteristics and ensures that all employment decisions are based only on valid job requirements, and all personnel actions are administered without regard to protected characteristics. The SAS Code of Ethics applies to every employee - at every subsidiary and in every region - as well as employees at all levels of SAS. Failure to comply with the SAS Code of Ethics or other applicable policies can result in disciplinary action, up to and including termination.



The Code of Ethics is publicly available and linked in this report. The Code of Ethics is made available to the public to demonstrate the company's vision and values for the benefit of customers, suppliers and other stakeholders. The Code of Ethics is also available to all employees on the company's intranet, has been translated into eight languages, and is periodically promoted by the company's communications program. The content of the Code of Ethics is the same in both the publicly available and employee versions; however, the internal version also includes live hyperlinks to associated internal SAS policies and procedures, which serve as a guide for employees on specific requirements to ensure and maintain compliance with the Code of Ethics and with SAS' overall mission and core values. SAS expects third parties with whom it does business to represent SAS with the same commitment to integrity, ethics and compliance and outlines those expectations in its [Business Partner Code of Conduct](#).

In 2022, SAS formalized its commitment to [responsible innovation](#), ensuring its platform, processes and services keep the focus on people, with an "ethical by design" approach throughout product development and market strategy. Those efforts are guided by the SAS Data Ethics Practice (DEP), a cross-functional team that guides a globally coordinated effort to help employees and customers deploy data-driven systems that promote human well-being, agency and equity. The DEP collaborates with groups like EqualAI and the Business Roundtable to help shape the responsible use of AI.

Globally, SAS enhanced:

- Risk assessment procedures by continuing to reassess its global corporate criminal law gap analysis.
- Online training by beginning plans to update Code of Ethics, Anti-Corruption and Trade Law Training to prepare for refreshed content in 2023.

In 2022, these SAS offices participated in the below governance and management activities:

- SAS Finland, Italy, Scotland R&D, Spain, Portugal, United Kingdom and Ireland, and United States hold ISO 27001 security certifications.
- SAS Australia, Italy, Scotland R&D, Spain and United Kingdom and Ireland hold ISO 9001 quality certifications. SAS Poland is certified to ISO 9001.
- SAS Spain holds ISO 14001 environmental certification.
- SAS United Kingdom and Ireland are certified to Cyber Essential Plus.

2022 DATA

SAS did not have any substantiated, materially negative incidents with regard to public policy, privacy, corruption, ethics, bribery, anti-competitive actions, anti-trust violations or monopoly practices, societal impacts, the environment, labor practices, or employee discrimination or harassment; nor were there any sanctions or fines for noncompliance.

Training

SAS increasingly utilizes training as a way to convey important information and help our employees remain current on key compliance-related topics. SAS formed a Training Council in 2021 which consists of representatives from various divisions within the company, and the mission of the Training Council is to collaborate on and coordinate best practices, content alignment, and training schedule timelines for required all employee training. The Ethics and Compliance group within the SAS Legal Division, the SAS Human Resources Division, the Chief Privacy Officer and the Information Security Office have developed courses to help employees abide by the SAS Code of Ethics and applicable external rules and regulations. Notable 2022 courses include subjects covering data privacy and information security. In 2022, The Ethics and Compliance group began work on updating its global SAS Code of Ethics, Anti-Corruption and Trade Law training. SAS provides this training to equip all employees to make the right choices when ethical and regulatory challenges arise, and when possible, in multiple languages in addition to English.

How SAS monitors and tracks completion and renewal of training varies, depending on relevant policies, strategies, trainings and codes. Automated reminders are sent to those who have not completed training as the deadline approaches, and managers are contacted as trainings become overdue.

In 2022, SAS employees were required to complete a variety of online courses including:

- Social Engineering and Phishing
- Acceptable Use of SAS Systems and Networks
- Protecting Your Privacy Using Proper Data Classification and Handling
- Security Incident Response Team (SIRT) Training and Awareness

SAS Human Resources offers training focused on diversity, equity and inclusion; has facilitated voluntary conversations on these topics; and has invited internal and external speakers to discuss bias, equity and diversity. The HR division is also working on updating its training on the topic of respect in the workplace.

SAS provides specialized training for personnel as needed. For example, SAS sourcing and procurement requires training on sustainability topics. In addition, SAS conducts targeted training such as lobbying training for government sales and marketing groups and anti-corruption training for employees working in high-risk geographies and activities, a Privacy and Data Classification and Handling Standard Training, targeted trade law training for personnel performing higher-risk activities and services and HIPAA training for employees interacting with data associated with its health care industry solutions.

Employee Feedback

Employees are responsible for appropriately communicating concerns regarding suspected unethical or illegal conduct through various reporting avenues. Specific procedures for reporting concerns are displayed on the Legal Division's internal website and outlined in SAS' global policies. Employees may submit comments to SAS Ethics and Compliance via email, telephone or an anonymous online form. Employees may also submit comments and concerns to their Human Resources Business Partner, anyone in the Human Resources Division, or to any manager at SAS.

SAS does not retaliate against anyone who reports suspected violations in good faith. All reports of misconduct are investigated in a timely fashion pursuant to a review protocol. Unless the complaining individual chooses to remain anonymous, he or she receives feedback on the results of the investigation, to the extent allowed by applicable law.

2022 DATA

100% of concerns reported to SAS Ethics and Compliance were investigated and addressed as needed.

Anti-Corruption

SAS has an anti-corruption program to prevent, detect and correct fraudulent and corrupt behavior. The anti-corruption program includes:

- Risk assessments (including geographic, transactional and program assessments).
- Anti-corruption policies, processes and procedures (including gift, marketing event, "revolving door," conflict of interest, lobbying and donations) and third-party anti-corruption due diligence process and procedures.
- Anti-corruption specific training and communications including live, in-person, targeted training for sales, marketing, finance and other affected groups.

A summary of the anti-corruption program and links to the related policies, processes and procedures are available to all employees on the Legal Ethics and Compliance internal website.

As part of SAS' third-party anti-corruption due diligence process, SAS conducts onboarding and ongoing due diligence on subcontractors, partners and other third parties to verify their reputability and identify and mitigate anti-corruption risks. SAS also contractually requires that its third parties comply with the principles set forth in its Code of Ethics and Business Partner Code of Conduct, including anti-bribery provisions. SAS conducts audits and transaction-specific due diligence measures to support compliance in high-risk transactions.



Export Controls

SAS maintains an export management system complete with product licensing and screening processes that include blocking exports to embargoed/prohibited destinations and checking employees, customers, suppliers and others against US and other applicable lists of prohibited parties and entities. SAS also files regular and timely anti-boycott reports as required by US law.

SAS classifies its products according to US export laws, makes such classifications available to its customers at the SAS Current Export Designation Information page, and exports its products subject to US and other applicable export laws.

Privacy

Privacy has become part of mainstream business culture as companies respond to emerging state, federal and international privacy and data protection legislation; rapid changes in technology and security; and growing consumer and employee concern about the collection, storage, use and sharing of personal information. At SAS, we place great importance on safeguarding the privacy rights that individuals have to their personal information. Personal data controlled and processed by SAS follows applicable data protection laws, SAS policies and customer expectations in all countries where SAS operates. Oversight of corporate-wide privacy compliance, including appropriate placement of controls, processes and procedures on information under SAS' custodial control is governed by the:

- Privacy Office, led by the Chief Privacy Officer and others residing within the Legal Division. This dedicated privacy team owns the Program oversight.
- Extended privacy team focused on supporting privacy program initiatives by assisting with the establishment of procedures and engagement with business function representatives.
- Privacy Champions Network composed of representatives from geographic regions and business functions providing support and greater awareness of the privacy program within their area of responsibility.

These privacy teams are committed to driving a "privacy by design and default" culture in all SAS operations internally and externally. However, the scope for SAS' privacy activities does not end there. SAS considers privacy a shared responsibility for stakeholders throughout the organization, including employees, executive leadership, managers, and external entities such as partners, vendors and customers. As such, employees and certain categories of contractors complete annual training on privacy and information security practices. We're invested in getting the security and privacy message out to all employees and promote continued awareness through internal articles, videos and emails as refresher training.

Additionally, SAS has robust processes and systems for responding to Data Subject Access Requests and conducting Privacy Impact Assessments for its operations, as required by law.

SAS, in its [privacy statement](#) and elsewhere, makes a commitment to respecting privacy and carefully managing the way we collect, handle and use personal data. For more information on SAS' privacy practices, please visit the [Trust Center](#).

Organizational Resilience

At SAS, organizational resilience, including [business continuity management](#) is an important global corporate initiative, addressing threats or hazards that may affect employees or customers or disrupt business operations. Organizational resilience planning supports corporate governance, information security and corporate social responsibility.



Supply Chain

SAS strives to partner with suppliers proven to be socially, environmentally and ethically responsible, particularly those that align their values with the UN Sustainable Development Goals and treat their employees fairly and with dignity. A major emphasis is placed on engaging in long-term partnerships with direct and indirect suppliers capable of meeting our local, regional and global requirements. When it makes sense for the company, a priority is placed on contracting with suppliers with a local presence.

A wide range of best practices, tools and policies are used to ensure that the supply chain remains strong, and the company selects the best fit for all sourcing needs. Direct suppliers are those that provide materials or services used in creating the end products and services that SAS provides to customers. These include hardware, software, CIS infrastructure, and anything “as a service” (XaaS). Indirect suppliers provide support for operating the business in areas such as food services, legal, accounting, real estate, travel and facilities services.

To manage a supplier’s history and performance, SAS uses several mechanisms, such as service level agreements, key performance indicators, benchmarking, and supplier relationship management. Current and prospective suppliers are also subject to ongoing anti-corruption due diligence which, in proportion to the level of business risk, screens the supplier and any relevant or high-risk individuals within their organization. An advanced due diligence process is used for suppliers assisting in sales efforts and potential acquisitions. Depending on the potential risks, the supplier’s background, qualifications, conflicts of interest, financial condition, and history of regulatory violations are subject to investigation. SAS Business Partner Code of Conduct requires business partners to determine if their 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.

The supply chain compliance program also consists of contractual requirements for anti-corruption and ethics rules for contractors and consultants. In addition, SAS conducts in-person and online training, expense record and expenditure reviews, audits, and global outreach through organizations such as the UN Global Compact. SAS voluntarily provides supply chain information for the CDP supplier survey.

Internally, SAS maintains high levels of performance and procedural requirements for Strategic Sourcing and Procurement staff. When appropriate, competitive bidding is used to maintain objectivity and help promote competition and fairness in the marketplace. To support the sustainability initiatives outlined in the [SAS Sustainable Procurement Charter](#), employee performance evaluations for procurement personnel require that 30% of annual training be directly related to sustainability. SAS' standard Request for Proposal emphasizes the importance of corporate social responsibility, including environmental stewardship and promotion of supplier diversity. These standards not only apply to SAS per se, but to our ongoing expectations of current and prospective suppliers to uphold human rights, labor, social, environmental and ethical practices as well. Should a potential supplier not be a diverse company, SAS may request a statement outlining any active supplier diversity programs, along with opportunities it has undertaken to contract with diverse suppliers. SAS' standard vendor agreements and purchase orders used by its Strategic Sourcing and Procurement organization requires adherence to the [SAS Business Partner Code of Conduct](#) or the principles set forth therein.

Supplier Diversity

SAS' customers represent a wide range of industries, people and locations – and the company seeks this same level of diversity in its supplier community. SAS' Supplier Diversity is committed to seeking, developing, and partnering with diverse suppliers. SAS recognizes that engaging with diverse suppliers is a win-win strategy for all involved. The development of diverse suppliers contributes to the economic success of the communities SAS serves, and partnerships with diverse suppliers provide competitive advantages and innovative business solutions to support SAS' customers.

SAS' membership with nongovernmental organizations, such as the National Minority Supplier Development Council, Disability:IN, and many other organizations furthers our commitment to working with and developing diverse suppliers. These organizations provide direct access to diverse suppliers through matchmaking and networking events. In 2021, Supplier Diversity partnered with an affiliate chapter of the National Gay and Lesbian Chamber of Commerce, and Disability:IN to provide diverse certification business training, capability statement training, and business pitch training to its members. The program grew to add mentoring for our prime suppliers that are growing their own supplier diversity programs, and the team taught several supplier diversity best practice classes with organizations that provide professional certifications to supplier diversity professionals. Additionally, SAS Supplier Diversity maintains active board and volunteer positions in these and other organizations supporting diverse businesses.

SAS recognizes the following underrepresented business categories in its supplier diversity program:

- Minority-Owned Business Enterprises.
- Women-Owned Business Enterprises.
- Disability-Owned Business Enterprises.
- LGBTQ-Owned Business Enterprises.
- Veteran or Service-Disabled Veteran-Owned Businesses.
- Federal HUB Zone-Certified Businesses.

SAS encourages diverse businesses interested in more information about potential working opportunities and relationships to email supplierdiversity@sas.com.

Suppliers and the Environment

The environmental impact of business activities extends beyond the SAS campus and workspaces to the entire value chain, from suppliers to distribution channels to product use. SAS Strategic Sourcing and Procurement:

- Actively works with the Environmental Management Program to reduce the environmental impact of supply chain processes.
- Strongly encourages employees to give consideration and preference to suppliers with environmental practices and programs.
- Promotes the adoption of environmental principles by contractors and suppliers, encouraging or requiring improvements.
- Supports annual submissions for the annual CDP, EcoVadis and other customer-requested supply chain questionnaires.
- Invests in sustainability and environmental training for sourcing and procurement teams.
- Makes extensive use of green products, such as environmentally friendly cleaning supplies and low-emission paints and products for campus buildings. The procurement teams routinely assist with finding the most efficient and earth-friendly options.
- Maximizes investments by eliminating unnecessary purchases, extending the life of assets through repurposing and reselling outdated equipment to employees as well as donating materials to educational institutions. Only then are materials processed for responsible recycling.

To more accurately report scope 3 emissions from its purchased goods and services, SAS has started collecting GHG emission and climate-related data from its suppliers. SAS' short-term strategy is to collect climate data from its tier 1 suppliers and work with its customers to build capacities in its supply chain to ensure compliance with emerging global regulations. SAS is developing a long-term strategy, schedule and targets for this initiative. As a software company, SAS has limited risks and concerns regarding raw materials, hazardous wastes and supplier practices.



2022 DATA

- SAS initiated efforts for improving data collection and reporting for scope 3, category 1 emissions from purchased goods and services.
- SAS continued to research options for reducing environmental impact of supply chain processes.
- Thirty-four percent of all sourcing and procurement training hours were dedicated to sustainability and environmental related topics.
- As in years past, SAS completed the annual CDP supply chain questionnaire related to greenhouse gas emissions inventory and related climate change management. SAS achieved a CDP performance score of A for supplier engagement, ranking the company in the leadership band and top 8% of all respondents. SAS achieved a B rating for climate change and ranks in the top 27% of companies reaching the management level. SAS also achieved a Gold sustainability rating for its participation with the EcoVadis supply chain survey.