



SAS Institute Inc. ("SAS") is committed to the highest standards of ethical conduct as well as social and environmental responsibilities, and expects our suppliers to share our values. Our suppliers, 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. SAS will review adherence to these requirements and evaluate potential suppliers' support of these principles while making sourcing and procurement decisions. Suppliers must abide by the [SAS Code of Ethics](#) and all applicable laws and regulations.

SAS reserves the right, at its discretion, to reasonably request information and perform evaluations to ensure that suppliers, subcontractors, and any others providing goods or services to SAS are complying with this Code of Conduct.



Ethics

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

- **Business Integrity.** Supplier will abide by all applicable anti-corruption and competition laws and regulations in the countries in which it operates including, but not limited to, the Foreign Corrupt Practices Act. Supplier shall not engage in corruption, extortion, embezzlement or bribery, or offer gifts or favors to obtain an unfair or improper advantage for its business. Suppliers will not engage in the improper exchange of competitive information, price fixing, bid rigging or improper market allocation.
- **Conflict Minerals.** Supplier is 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. Supplier must disclose the presence of any conflict minerals in any products supplied to SAS.
- **Disclosure of Information.** Supplier must respect intellectual property rights and protect SAS and customer information. Supplier is expected to safeguard and protect confidential information from misuse or unauthorized disclosure.
- **Whistleblower Protection/Anonymous Complaints.** Supplier must provide an environment that allows employees to raise concerns without fear of retaliation. Supplier must provide employees the ability to anonymously file complaints or discuss workplace issues without fear of retaliation.



Environmental

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

- **Environmental Regulations and Permits.** Supplier 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.** Supplier 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. Supplier must provide and maintain a safe work environment and ensure health and safety practices are integrated into the business

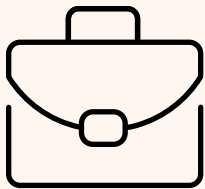
- **Work Environment.** Supplier must adhere to all applicable workplace health and safety laws and regulations, including, but not limited to, Occupational Health and Safety Administration (OSHA) regulations. Employees should be regularly trained on the health and safety information relevant to the work they perform and must have the right to refuse to work in unhealthy or unsafe working conditions. Supplier 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.** We expect our suppliers to provide a safe, healthy and secure work environment by maintaining a drug-free workplace policy.
- **Emergency Response/Preparedness.** Supplier must have an emergency preparedness and response program in place designed to minimize harm to life, environment and property.



Human Rights/Labor

SAS expects all employees of Supplier to be treated fairly and ethically, with respect and dignity. Supplier 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.** Supplier 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. Supplier 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, Supplier 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.** Supplier must not subject workers to corporal punishment, physical, sexual, psychological or verbal harassment or abuse.
- **Anti-Discrimination.** Supplier is expected to support diversity and provide equal opportunity employment in their workplaces. Supplier 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.** Supplier 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.** Supplier must comply with applicable wage and hour labor laws and regulations governing employee compensation and working hours. Supplier 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. Supplier must be proactive in ensuring the principles of this code are adopted and implemented by their suppliers and contractors to the extent applicable.

- **Management System.** Supplier must adopt or maintain a management system that is designed to ensure compliance with applicable laws, regulations and customer requirements. Supplier should conform to the principles of this Code of Conduct and make every effort to identify and mitigate operational risks.
- **Records and Documentation.** Supplier 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 Supplier may direct questions or comments about this Supplier Code of Conduct to the SAS Compliance Department at askcompliance@sas.com.

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

Telephone:

1 919-531-4747 from anywhere in the world

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