

Speak Up SAS PORTUGAL

SAS has a global procedure for reporting and responding to concerns. As an employee of an 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 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 information reported 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 a Concern 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
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*SAS employees can also visit the [Speak Up SAS Internal Page](#)

Speak Up SAS Portugal Program

Employees of SAS' Portugal legal entity may also be able to report their concerns through a Local Reporting Channel. In principal, 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 at 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 whistleblower procedure is to provide employees and collaborators with an additional means to raise concerns.

Who Can Report

Individuals who obtain information in a professional context, including

- employees;
- contractors;
- service providers;
- consultants;
- volunteers;
- trainees (paid or unpaid);
- shareholders;
- and members of management or supervisory bodies.

What Can Be Reported

Acts or omissions that are unlawful or contrary to EU law or national law in areas covered by Law no. 93/2021, including

- public procurement, financial services and AML/CFT, product and transport safety, environmental protection, public health, consumer protection, protection of privacy and personal data, network and information systems security,
- EU financial interests, internal market and competition rules, and serious criminal or administrative offences.
- Violations of the SAS Code of Ethics may also be reported; however, statutory whistleblower protections apply only where the report falls within the scope of the law.

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 redescribed below.

Electronic Mail	AskCompliance@sas.com
Telephone (toll-free in US and Canada)	1-866-680-7122
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Ways to Report Locally (Local Reporting Channel)

If you would rather use a Local Reporting Channel, you may do so via a face-to-face meeting or by using the following email. You may also report your concern anonymously, although this may limit SAS' ability to acknowledge and, if necessary, clarify your concerns, and to provide feedback. The Local Reporting Channel is established in application of the Portugal Whistleblower Law 93/2021, taken in its entirety. This procedure compliments the existing global procedure in place and in case of discrepancy, the Portuguese procedure shall prevail in Portugal. As a reporter, you may be entitled to various aspects of legal protection provided for in this legislation, regarding i.e. protection against retaliation. For more details, speak to your Local Reporting Channel.

Local Electronic Mail	SpeakUpPortugal@sas.com
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What to Expect After Reporting

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:

- You will receive an acknowledgement of your report within 7 days of submission and, where relevant, the opportunity to check and rectify your concern.
- Follow-up information regarding measures envisaged or taken will be provided within three months from the date of receipt of the report. Investigations will be conducted in accordance with applicable laws and SAS policies.
- Your report will be investigated in accordance with applicable laws and company policies.

Reporting Concerns to a Competent External Authority

Under Article 7 of Law no. 93/2021, reporters may submit a report to a competent external authority, including the National Anti-Corruption Mechanism (Mecanismo Nacional Anticorrupção – MNAC), without first using the internal channel where legally permitted, including where no internal channel exists, where there is a

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reasonable belief that the issue cannot be effectively addressed internally or there is a risk of retaliation, where no feedback is provided within the legal timeframe, or where the breach constitutes a serious criminal or administrative offence.

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

Please see the [SAS Privacy Notice for Residents of the European Economic Area \(EEA\), Switzerland and the United Kingdom \(UK\)](#) for information.