Speak Up SAS ITALY

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 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 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
*SAS employees can also visit the Speak Up SAS Internal Page	

Speak Up SAS Italy Program

Employees of SAS' Italian 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 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 Italian 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:

- a violation, (a conduct, act, or omission) of an Italian law, a European Union law, or an international law ratified by Italy, that may harm the general public, the integrity of public administration or the company, in areas such as:
    - public procurement; financial services; products and markets and the prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and protection of personal data and security of networks and information systems;
    - EU financial interests;
    - fair competition; or
- a violation of the SAS Code of Ethics.

Examples of concerns that are excluded:

- Disputes, claims, or demands linked to an exclusively personal interest of the Whistleblower.
- Reports of violations already mandatorily regulated by the European Union or national acts.
- Reports of breaches of national security, procurement relating to defense or national security aspects unless these aspects are covered by the relevant secondary legislation of the European Union.

Who Can Report Concerns:

- Current and former employees and collaborators of SAS Italy;
- Self-employed workers, freelancers and consultants;
- Volunteers and trainees;
- Shareholders and persons with administrative, management, control and supervisory or representative functions;

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
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 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 Legislative Decree No. 24/2023, dated March 15, 2023, commonly referred to as "Whistleblowing" decree", taken in its entirety (and more specifically, (Article 4(1) WB Decree) This procedure compliments the existing global procedure in place, and in case of discrepancy, the Italian procedure shall prevail in Italy. 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	SpeakUpItaly@sas.com

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.

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:

- You will receive an acknowledgement of your report within 7 days of submission and, where relevant, the opportunity to check and rectify your concern. If you request it, you have the right to receive additional information communicated throughout the next 90 days.
- You will receive a follow-up within 90 days of the initial acknowledgement of your report with information about proposed or adopted measures to address the concerns you have raised if appropriate. Please note in some cases the follow-up at this stage may provide an update that the investigation remains ongoing.
- Your report will be investigated in accordance with applicable laws and company policies.
- SAS will follow the same Confidentiality and No Retaliation provisions described above.

What Else Should I Consider

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

- What happened – acts, omissions, pre-conditions, post event impact?
- Where did it happen – location names, descriptions, events in relation to places?
- When did it happen – times, dates, chronology, order of events?
- Who was involved – names (formal and known by), business titles, descriptions, relationships?

Reporting 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 Italy may also report an in-scope concern to a competent external authority, either after having made an internal report under the conditions provided above, or directly:

- National Anti-Corruption Authority (ANAC), but only when you have first made an internal report and no action has been taken.
- To an institution, body or agency of the European Union competent to collect information on violations falling within the scope of the Directive. 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 Protection Obligations

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