

## Speak Up SAS Belgium

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	<a href="mailto:AskCompliance@sas.com">AskCompliance@sas.com</a>
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 USA
*SAS employees can also visit the <a href="#">Speak Up SAS Internal Page</a>	

## Speak Up SAS Belgium Program

Employees of SAS' Belgium 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 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 Belgium whistleblower procedure is to provide employees and contractors with an additional means to raise concerns.

### Guidance for Reporters

The following concerns can be reported to the Local Reporting Channel.

Scope: Breaches or violations related to:

- A violation, (a conduct, act, or omission) of a Belgian law, a European law, or a violation that may harm the general public, in areas such as:
  - Violation of 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, animal health and welfare; public health; consumer protection; protection of privacy and protection of personal data and security of networks and information systems; tax fraud; social fraud;
  - A violation of EU financial interests;
  - A violation of Fair competition; or
    - A violation of the SAS Code of Ethics.

Examples of concerns that are excluded:

- National security issues, except as it relates to violations of public procurement for defense and security;
- Issues related to classified information;
- Issues related to medical secrecy;
- Issues related to attorney/client information;
- Issues related to the secrecy of judicial deliberations.

Who Can Report Concerns:

- Current and former SAS employees;
- self-employed workers;
- shareholders and persons with administrative, management or supervisory functions, including non-executive members, as well as volunteers and paid or unpaid interns;
- any person working under the supervision and direction of contractors, subcontractors and suppliers of SAS Belgium;
- candidates and probatory workers;

- colleagues or relatives to the whistleblowers; or
- Entities owned by the whistleblower.

## 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 redescrbed below.

Electronic Mail	<a href="mailto:AskCompliance@sas.com">AskCompliance@sas.com</a>
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 USA
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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 Act of 28 November 2022 (“Wet betreffende de bescherming van melders van inbreuken op het Unie- of nationale recht vastgesteld binnen een juridische entiteit in de private sector). 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 contact.

Local Electronic Mail	<a href="mailto:SpeakUpBelgium@sas.com">SpeakUpBelgium@sas.com</a>
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## What To Expect After Reporting a Concern

- You will receive an acknowledgement of your report within 7 days of submission and, where relevant, the opportunity to check and rectify your concern.
- You will receive a follow-up within 90 days or 3 months 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, you are also able to report your in-scope concern to a competent external authority. For Belgium, these are listed in the Federal ombudsman's website, accessible [here](#). The relevant modalities for external reporting can be found on the websites of this relevant competent authority.

### **Who Should I Contact if I Have any Questions about the EU Whistleblower Directive**

Please contact [AskCompliance@sas.com](mailto: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 refer to [SAS Privacy Statement for Residents of the European Economic Area \(EEA\), Switzerland and United Kingdom \(UK\)](#) for more information regarding data protection.