

SAP SE response to questions by Business & Human Rights Resource Center related to partial mobilisation

Context from BHRRC: “On 21 September 2022, Russian President Vladimir Putin announced partial mobilisation in Russia. The accompanying legislation on mobilisation - known as [Article 9](#) of Federal Law No. 31-FZ - mandates all organisations, including international companies, to conduct military registration of the staff if at least one of the employees is liable for military service. They must also assist with delivering the summons from the military to their employees, ensure the delivery of equipment to assembly points or military units, and provide buildings, communications, land plots, transport and other material means as well as information. In light of this development, we would like to invite SAP to respond to the following questions:”

What immediate action your company has taken or intends to take to evaluate and respond to the implications of the mobilisation decree?

- The wellbeing and safety of our employees remains our top priority. All employees and their immediate family members have access to an anonymous, free Employee Assistance Program, which provides psychological, legal or financial counseling. As a company registered in the IT sector, we are providing statements for employees in specific roles to be handed out to military recruitment offices requesting exemption from the mobilization list. We are also implementing accelerated business continuity plans for international service units.

If your company chooses to continue operating in Russia despite the declared partial mobilisation, how are you planning to mitigate the heightened risk of contributing or being directly linked to the armed conflict and exacerbating the situation?

- SAP remains committed to our ongoing, orderly wind down of business operations in Russia and Belarus. In addition to fully implementing international sanctions, SAP has stopped all sales and has shut down our cloud operations in Russia, as well as significantly reduced staffing levels to those required to carry out the wind down and related obligations, and those relocation cases where the final transfer could not be finalized in 2022 due to missing visa/work permits.