

Partner Due Diligence, AB&C and Sanctions

Frequently Asked Questions

Background

Sage is committed to building a sustainable and successful business adopting the highest ethical standards and demonstrating the upmost integrity. It is therefore essential that our partners hold similar values to us, act responsibly and operate to the same high ethical standards as those we have adopted.

As a global company which is publicly listed, Sage is subject to laws and regulations in a number of jurisdictions. In some cases, our partners will also be required to comply with these laws and regulations by virtue of their relationship with Sage.

The Partner Code of Conduct, along with our recently enhanced Partner Due Diligence Process, support us in ensuring we work with a thriving community of accountants, partners, developers and entrepreneurs, and build sustainable working relationships built on trust and open communication.

Q&A

Anti-Bribery and Corruption:

Q. What is Sage's stance to Anti-Bribery and Corruption?

A. Sage takes a zero-tolerance approach to bribery and corruption. As a UK listed company, Sage is bound by the laws of England and Wales (including the Bribery Act 2010) in respect of our conduct both in the UK and worldwide and we will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

Sage conducts its business in an honest and ethical manner. We do not tolerate bribery and corruption (whether this involves Sage directly or indirectly through our partners or other third parties we work with) and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

Q. What can my business do to help achieve compliance?

A. Some examples of how businesses can seek compliance include;

- (i) having procedures in place to prevent bribery and corruption,
- (ii) carrying out due diligence on clients, customers and other third parties that you work with,
- (iii) having policies in place, as well as improving communication and training internally, and
- (iv) continually monitoring, reviewing and improving the ways in which your business manages compliance risks.

Q. Why do I need to comply / Why is this important for me and my business?

A. To continue to do business with Sage its important you comply will all aspects of the Partner Code of Conduct including compliance with bribery and corruptions laws. It's also important for your business to

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comply as the possible consequences of failing to comply could have a serious detrimental impact on your business (see below under consequences for further info).

Q. What are the consequences of failing to comply?

A. You may no longer be able to do business with Sage and Sage may terminate your relationship. In addition, there are also potentially wider consequences for your business (and its personnel) including fines, prosecution for individuals involved as well as company directors, and reputational damage.

Q. Where can I find out more? Who can I contact? How do I report any concerns?

A. Please refer to the Sage Partner Code of Conduct, which sets out minimum standards of behaviours that we expect from our partners, as well as details of how to report concerns.

See also <https://www.gov.uk/government/publications/bribery-act-2010-guidance>.

Alternatively, you can contact your usual Sage representative or Partner Account Manager.

Partner Due Diligence:

Q. Sage is requesting a lot of information as part of its due diligence process. Why do I need to provide all this information about my business?

A. As a leading global technology business we have high ethical standards and values and take our legal obligations seriously. To enable us to adhere to our obligations, to understand our third parties and to protect you and your business we ask you to provide us with information to help us confirm both the identity of your business and individuals linked to your business, including information to identify any individual or company that owns/controls 25% or more of the business. This information is only processed for acceptance of your agreement to be a Sage Business Partner and will not leave any footprint on personal files or credit files.

Sanctions:

Q. Whilst I understand that I can't do business in a sanctioned territory, what is the position where a user or subsidiary of my customer is in a restricted territory?

A. If Sage's products are being used in or accessed from a sanctioned country then both you and Sage might be in breach of sanctions, therefore this is not permitted. The law says that no company should ignore or "turn a blind eye" to what its customers or other associated people or companies are doing.

Q. Are there any exceptions to where I can do business? What if I have a high value deal?

A. The value of a deal is not relevant: what matters is compliance with the law and policy.

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tax, or compliance professional. When in doubt, please consult your lawyer, tax, or compliance professional for counsel.”