

Corporate and Employment Compliance

Sage complies with applicable North American and U.K. business conduct laws and regulations.

Antibribery and corruption

On July 1, 2011, the United Kingdom Antibribery Act 2010 became effective in the U.K. This law requires all U.K. businesses and their subsidiaries to comply with stringent antibribery legislation. The Antibribery Act introduces rigorous antibribery guidelines with serious consequences for both businesses and individuals who fail to comply. The Antibribery Act dictates that regardless of the country in which bribery takes place, if that bribery is committed for or on behalf of a U.K. business, then the Antibribery Act will apply.

Because The Sage Group plc is a U.K.-headquartered business, its subsidiaries, including our business here in North America, must comply with the U.K. Antibribery Act. To ensure that we comply, we have introduced a new Antibribery and Corruption Policy. The key principles of the Sage North America Antibribery and Corruption Policy are set out below.

- Sage and its employees do not and will not offer, promise, or give bribes or request, agree to receive, or accept bribes in any form (a bribe can be an offer of money but also any other financial or nonfinancial advantage or reward).
- Anyone acting for or on behalf of Sage (including some third parties or business partners we work with) must also refrain from engaging in any of the activities set out above.
- If anyone at Sage is concerned that this type of activity may be happening in the business, he or she can report it immediately and confidentially and be confident that action will be taken.
- The new policy does not prevent reasonable and proportionate gifts, hospitality, and entertainment, but where those gifts, hospitality, and entertainment are unreasonable, disproportionate, or given in inappropriate circumstances (for example, when a Sage employee is considering whether to award a contract to someone) then they may constitute bribes and should not be offered or accepted. Common sense should always prevail.

Sage takes these principles very seriously and will continue to monitor and review any bribery and corruption risks which the business might face.

Equal Employment Opportunity (EEO)

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at Sage will be based on merit, qualifications, and abilities. Sage does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, age, protected disability, veteran status, sexual orientation,

gender identity, genetic information, or any other characteristic protected by applicable law.

Employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or Human Resources. Employees can raise concerns and make reports in good faith without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

Affirmative Action Plan (AAP) (Sage Software, Inc. only)

It is Sage Software, Inc.'s policy, as a federal contractor, to develop and implement written affirmative action compliance programs in order to assure applicants and employees the right to equal employment opportunities. In accordance with federal requirements, each location of the company with 50 or more employees shall maintain separate affirmative action plans. Such plans shall be available for inspection by employees and applicants upon request by contacting your local [HR representative](#) and scheduling an appointment during normal business hours. For remote employees and employees of locations with less than 50 employees, please contact your HR representative to arrange for inspection of the applicable affirmative action plan.

Sage is an equal opportunity workplace and affirmative action employer. We participate in E-Verify.

E-Verify Program

Federal law requires all employers to verify the identity and employment eligibility of all persons hired to work in the United States. Sage participates in E-Verify, a service of the Department of Homeland Security and the Social Security Administration for this purpose. Attached are posters to inform you of your legal rights and protections under this program:

- **E-Verify Participation Poster:** [English](#) | [Spanish](#)
- **Right to Work Poster:** [English](#) | [Spanish](#)

Job seekers

We will use the personal information you submit in our online job application to fill the specific position you apply for. After this position is filled, we will retain the information submitted for the time required by applicable law or in accordance with our standard practice, whichever is longer.

We will not release information submitted in online job applications to third parties except to appropriate governmental entities and/or our service providers as necessary in connection with recruiting, employment, corporate governance, acquisitions, and legal or regulatory requirements. We require that our service providers keep your personal information confidential as well. In addition, to prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate procedures to safeguard the information we collect online. You may submit requests or concerns about this policy or use of your personal information by email to RecruitingNA@sage.com.

Corporate social responsibility

We view our corporate social responsibility (CSR) activities as offering Sage the opportunity to be a good corporate citizen and also to support our global vision.

Our CSR policy

Our global CR policy focuses on four key areas where we believe we can make the most difference.

For three of these – Industry, Environment and People – we have established a global framework for our operating companies to work within, allowing them flexibility over which area to invest in according to what will have the most meaning and impact locally.

Whilst local legal standards apply as an absolute minimum, we aim to achieve good practice in our local markets and share this across the Group. The fourth area – Community – is entirely locally driven, allowing our people to support causes close to them and to become involved in their communities.

Sage Group has been independently assessed against the FTSE4Good criteria and satisfied the requirements to become a constituent of the FTSE4Good Index Series – an equity index designed to facilitate investment in companies that meet globally recognized corporate responsibility standards.

Industry

We aim to leverage the unique relationships that we have with our customers across the globe to continue to understand and support the issues and challenges that they face.

Environment

We continue to analyze our impact on our environment. We remain committed to reducing our energy consumption and related emissions where possible, as well as reducing our wider impacts such as resource use and waste to landfill. Our Annual Report and Accounts 2014 includes our mandatory reporting of greenhouse gas emissions pursuant to the Companies Act 2006 (Strategic Report and Directors' Report) Regulations 2013 and confirms the methodologies used to calculate our emissions. Further details about our methodologies can be found [here](#).

People

We have a Code of Ethics which recognizes the importance of treating all of our employees fairly, covering issues such as responsible employment, diversity and equal opportunities. This is an effective way of communicating, at a high level, the principles which should be applied in the conduct of our business.

Community

Our local communities are important to us. We support a number of charities and community organizations worldwide in order to make a positive impact on the communities where we have a presence.

- [English](#)
- [French](#)
- [German](#)
- [Brazilian Portuguese](#)
- [Spanish](#)
- [Polish](#)

The Code of Conduct sets out the business standards expected by Sage and provides a clear set of rules for all colleagues. Sage is building a great business the right way and every colleague should demonstrate the highest ethics.

Sage is building a sustainable and successful business for our customers, colleagues, partners and investors. It is imperative that our success is delivered in the right way, doing the right things. The highest standards of integrity are required at Sage and this Code provides total clarity on what these standards are. The Code of Conduct is the DNA of Sage business, professional and personal conduct. This Code of Conduct clearly sets out clear standards of behavior for everyone in our organization.

The Code demonstrates that Sage will operate responsibly and in accordance with all relevant laws and regulations.

Specifically, Sage will:

- Promote ethical business practice and trade ethically; complying with all relevant laws and regulations
- Behave fairly with colleagues, customers and partners
- Provide a safe route for colleagues to highlight non-compliance or concerns

This is not a tick box exercise but a vital part of the way Sage must operate in order to build a high quality, high integrity business for the long term.

Protection for speaking out

"I promise my personal protection for anyone that speaks out about something that goes against our Code of Conduct. Sage will provide you with the maximum support and protection if you take it upon yourself to stand up for what is right."

Stephen Kelly
Chief Executive Officer
The Sage Group Plc