Customer Enablement

Cybersecurity Month 2026 Program

Global AI Regulatory Compliance

Jun Sui, SAP AI Regulatory Compliance Governance

October 2026

PUBLIC

Customer Enablement | CSM Program

“We are pleased to inform you of our plans and desired outcomes. We are sharing this presentation for our informational purposes only, the information presented here is not intended to be definite or binding, and we will continue to provide regular updates as our plans evolve.”

Agenda

01 AI Governance at SAP

SAP’s Core AI Governance Domains, How SAP’s AI Governance Capabilities Evolved, How SAP Operationalizes AI Governance

02 EU AI Act

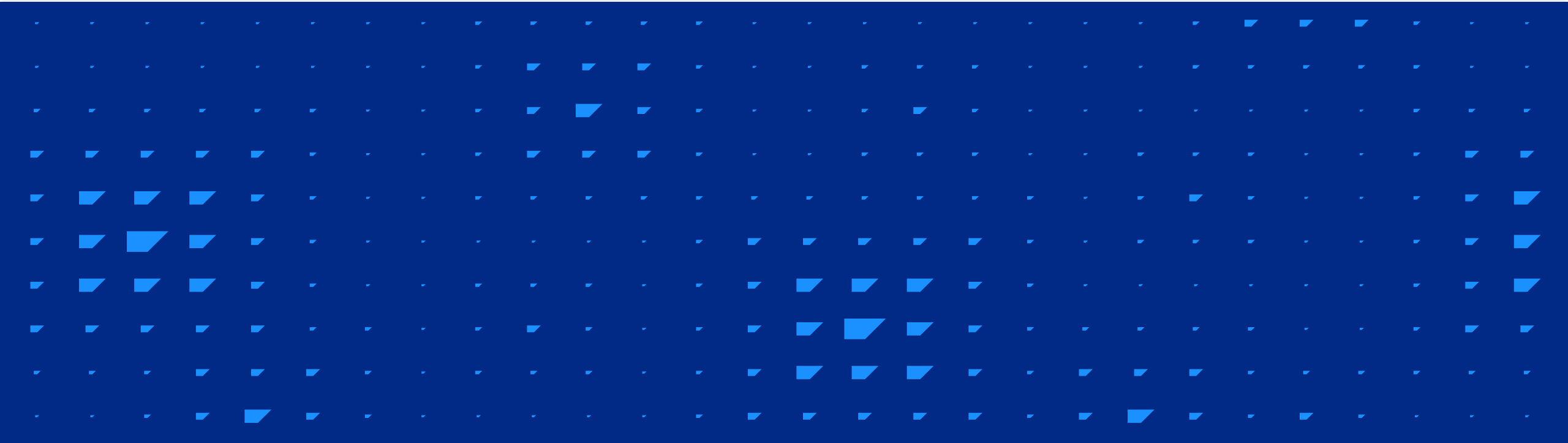
EU AI Act Essentials and Timelines

03 Global AI Regulations

Broad US AI Regulatory Trends, China AI Regulatory Framework, AI Regulations in APJ

PUBLIC

AI Governance at SAP



SAP’s Core AI Governance Domains

AI Governance operates in close alignment with AI Compliance, Security, and AI Ethics & Safety practices across SAP.

Trusted AI requires integrated governance.

While ethics defines our values and security protects our systems, ***our team‘s primary responsibility is AI Compliance,*** *ensuring SAP meets all regulatory and certification requirements.*

AI Compliance

Holistic Governance: EU AI Act • GDPR • NIST AI RMF
Certified: ISO/IEC 42001 • ISO/IEC 27001 • SOC 2 • CSA STAR

SAP Trust Center: From framework to legal assurance

AI Security

Smart safeguards: SAP Cloud & BTP Security + OWASP-ready

Trusted LLMs: No customer data used for training

AI Ethics & Safety

UNESCO-based policy and principles

Strong AI Ethics governance framework: AI Ethics assessment of every use case through structured process

How SAP's AI Governance Capabilities Evolved

From AI management system foundations to scalable global AI regulatory compliance readiness.

Evolving from ISO 42001 Foundations to Global AI Regulatory Compliance

ISO 42001 » **EU AI Act** » **Global AI Regulatory Compliance**

Establish AI Management System (AIMS)

- Define governance framework, policies, and controls
- Build organizational AI governance structure
- Standardize AI lifecycle processes
- Enable continuous improvement and auditing

Operationalize regulatory compliance requirements

- AI system and GPAI model classification
- Human oversight and transparency controls
- AI risk management and conformity readiness
- Technical and operational safeguards for high-risk AI Systems

Expand toward scalable global compliance governance

- Monitor emerging AI regulations worldwide
- Harmonize regional compliance requirements
- Build reusable and scalable governance capabilities
- Support trusted and globally compliant AI deployment

How SAP Operationalizes AI Governance

Building scalable governance capabilities across AI management systems, regulatory compliance, and enterprise governance operations.

AI Governance Capabilities

AIMS ISO 42001

AI Management System

The governance system SAP built and operates — certified under ISO 42001 in Sept 2025.

- **Define AI Management System:** policies, roles, processes, and controls across the AI lifecycle.
- **Extend LoB scope:** onboarding Product LoBs into the certified AIMS every 6 months.
- **Continuous improvement:** monitoring, auditing, and adapting the system as AI evolves.

Certified

ISO/IEC 42001:2023 — obtained Sep 2025. Scope extension in progress.

AI Regulatory Compliance Governance

AI Regulatory Compliance

Build and manage AI regulatory compliance governance for SAP, ensuring regulatory readiness and trustworthy AI.

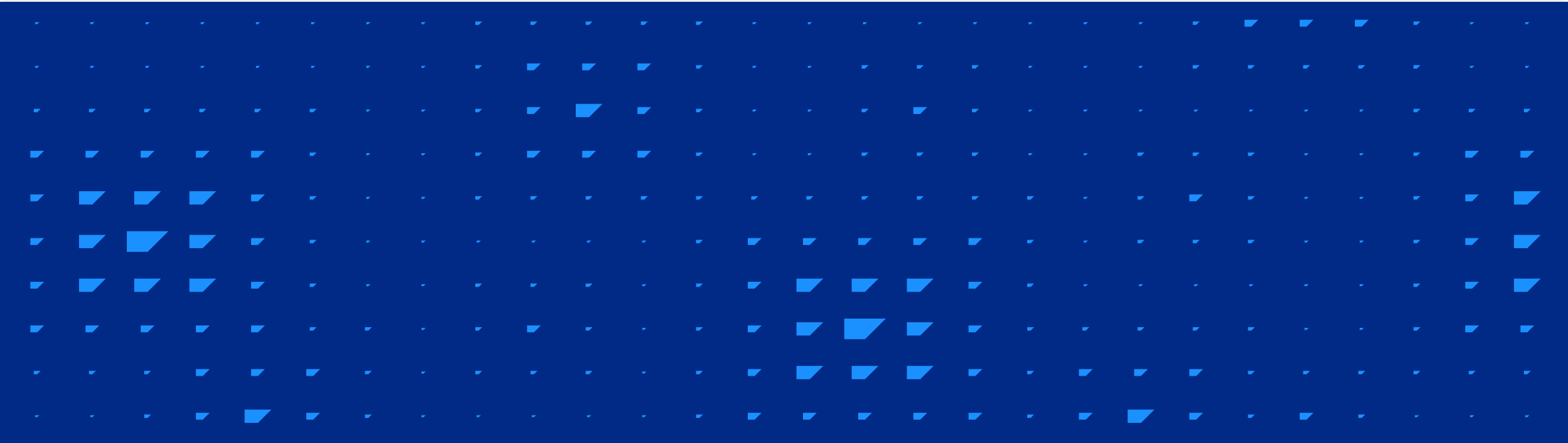
- **EU AI Act Compliance:** categorizing all SAP AI systems under the EU AI Act risk framework and operationalizing compliance requirements across SAP.
- **Global Regulatory Compliance:** monitoring and assessing emerging AI regulations worldwide (e.g. US, China, APAC and other regional regulations) to support scalable and globally aligned AI governance practices.

Evolving in 2026

EU AI Act Compliance Initiative has been uplifted to Global AI Regulatory Compliance Initiative — covering all major AI regulations worldwide.

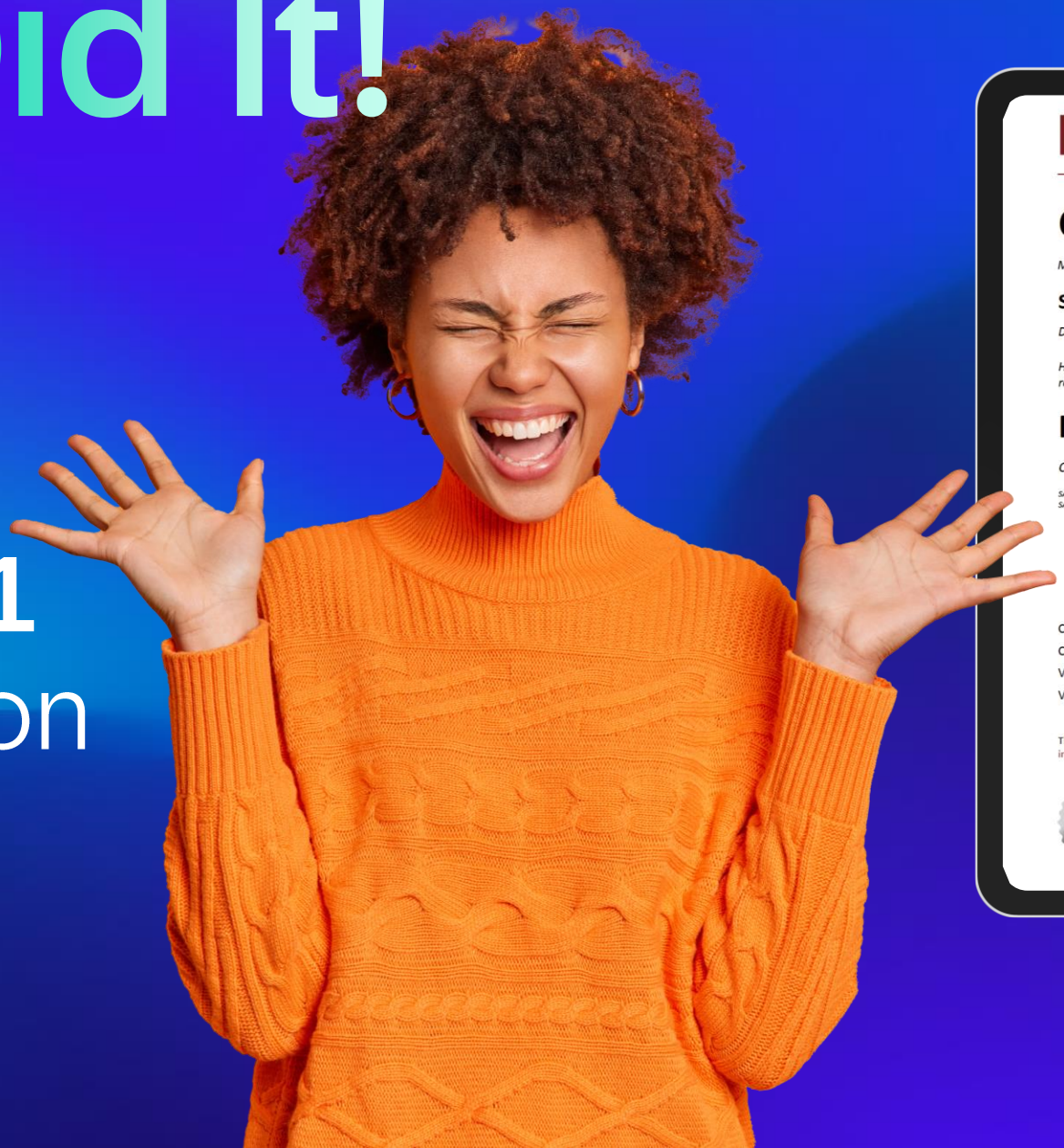
Corporate Reporting

ISO 42001



We Did It!

ISO 42001
Certification





MSECB

CERTIFICATE

MSECB hereby certifies that the management system of

SAP SE

Dietmar-Hopp-Allee 16, Walldorf, 69190, GERMANY

Has been assessed and found to be in accordance with the management system requirements in

ISO/IEC 42001:2023

Certification Scope:

SAP artificial intelligence management system governing the usage of AI in SAP and SAP Products and provisioning of AI via SAP Products, in accordance with the Statement of Applicability (SoA) Version 1.4, dated July 28, 2025.

Certificate No.	CERT-001123
Certified since	2025-09-30
Valid from	2025-09-30
Valid until	2028-09-29

Dren Krasniqi, Compliance Director

This certificate is subject to annual audits and can be validated by email request at:
info@msecb.com

MSECB

IAS ACCREDITED Management Systems Certification Body MSCB-111

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SAP

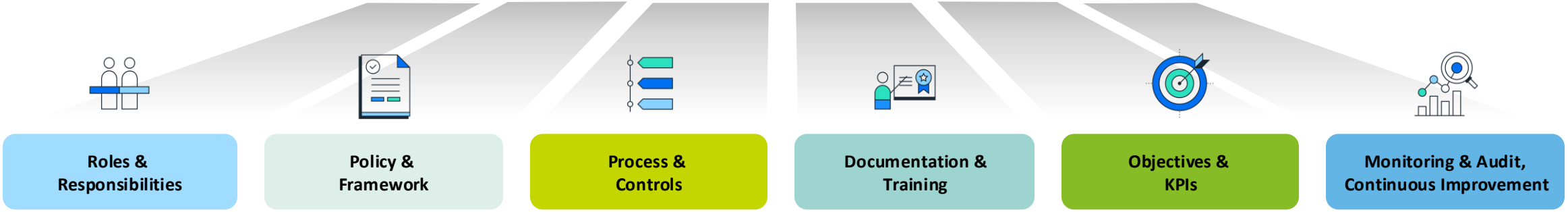
ISO 42001 – AI Management System (AIMS)

Methodology and Approach



AI Management System

- Aligned with other ISO standards: ISO 27001, ISO 22301, ISO 9001 and regulations
- Centralized Governance Model led by SAP Global Security & Cloud Compliance (SGSC)
- Aligned with existing services, processes, and controls already operating across SAP
- Reusing existing compliance and risk management tools (CoCo, SAP Passport, etc.)



*__Scalable, enterprise-wide framework__ enabling consistent AI governance across __all Lines of Business (LoBs)__

AIMS Implementation Progress

Centralized AIMS & Governance Model

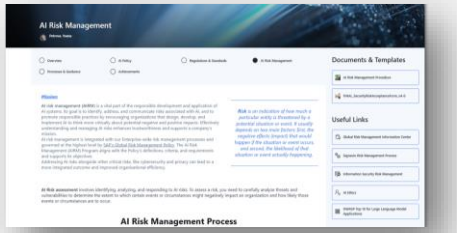
- Set up the AI Policy and the AI Scoping Document
- Defined AIMS Objectives and SOA
- Conducted health check on ISO readiness through BDO
- Audited by the SAP Internal/External Audit on the ISO readiness





AI Risk Management

- AI Risk Management Procedure setting the requirements for AI risk management
- Set up Risk Management Controls in alignment with ISO 42001 and EU AI Act
- Facilitated regular alignment calls with Stakeholders (RM02 and RM05)

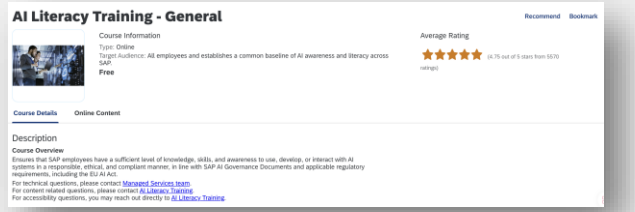
Regulatory & Existing Standards Adherence



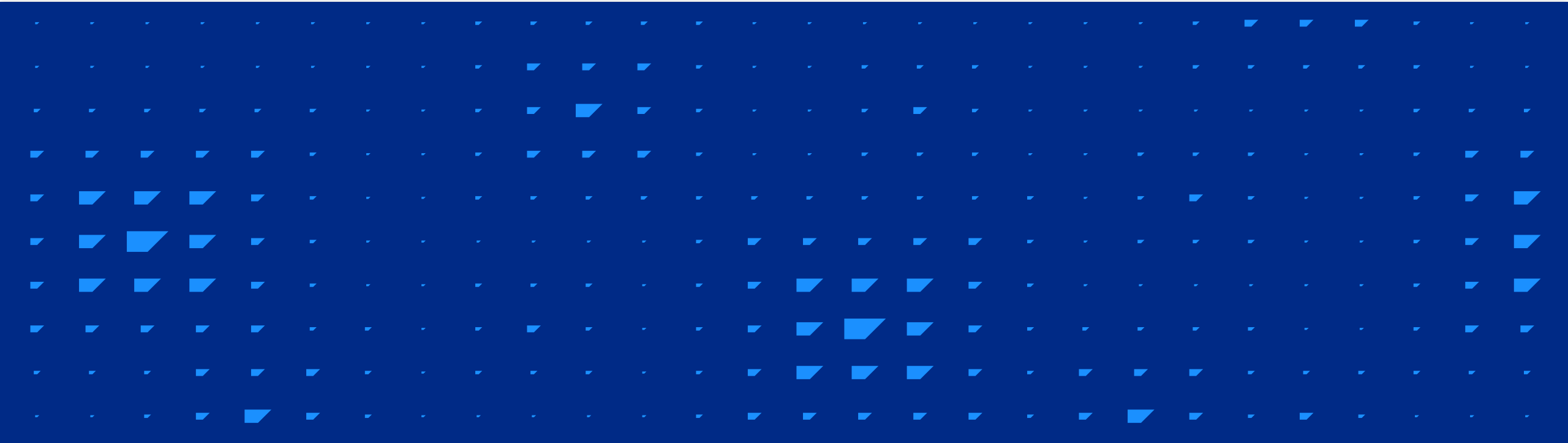
- **AI Control Design (ISO)**
  - Designed new AI controls for ISO requirements
  - Mapped existing SAP Controls (alignment with Security Control frameworks to ISO controls
- **AI Control Design (EU AI Act)**
  - Aligned with different working groups (AI Classification, AI Inventory, Data Governance, AI Risk Management, AI Literacy) to understand the requirements and map the as-is process.

AI Communication & Enablement

- Rollout of Mandatory AI Literacy Training (general training for all SAP employees and role-specific training for high AI exposure roles) in April
- AI Governance SharePoint



EU AI Act



EU AI Act Essentials



01

The EU AI Act is a comprehensive EU regulation designed to manage risks to health, safety, and fundamental rights arising from the development, deployment, and use of artificial intelligence.

02

It establishes a risk-based regulatory framework, defining obligations for AI systems placed on the EU market

03

As the first horizontal EU-wide AI regulation, it applies consistently across sectors and industries.

04

AI systems classified as high-risk must meet strict requirements for governance, documentation, transparency, and oversight.

EU AI Act Essentials



05 Structured into risk categories and system obligations, covering the full AI lifecycle from design to post-market monitoring.

06 Defines a broad scope of regulated actors, including AI providers, deployers, importers, and distributors operating in or targeting the EU market.

07 Sets role-specific obligations, such as quality management and technical documentation for providers, and oversight, monitoring, and incident reporting duties for deployers.

08 Establishes mandatory requirements for high-risk AI, including data governance, transparency, human oversight, robustness, and cybersecurity controls.

EU AI Act Timeline

July 2024

EU AI Act published

1 August 2024

EU AI Act enters into force

February 2025

Prohibitions & AI literacy provisions apply

August 2025

GPAI obligations & governance framework apply

August 2026

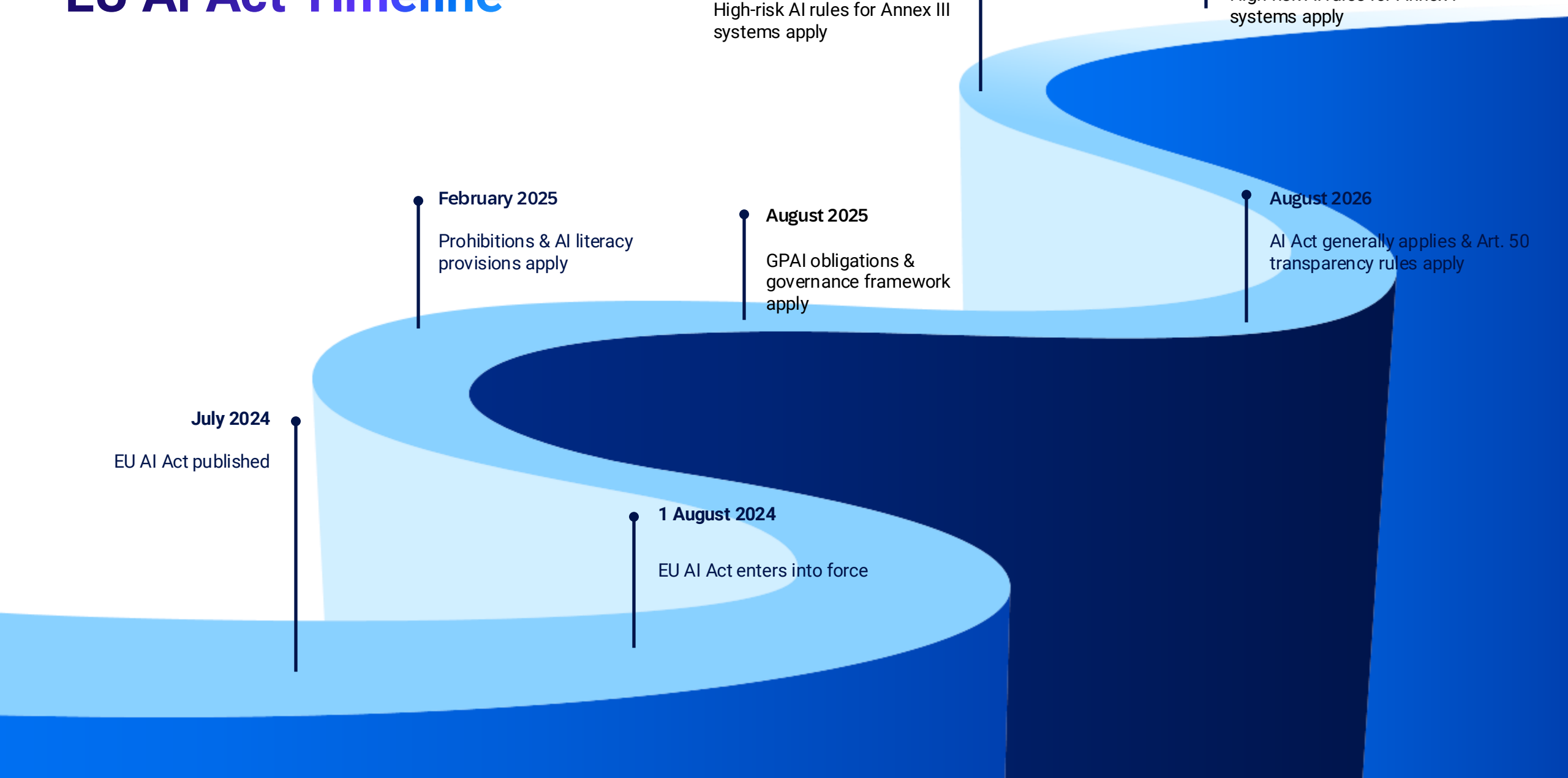
AI Act generally applies & Art. 50 transparency rules apply

December 2027

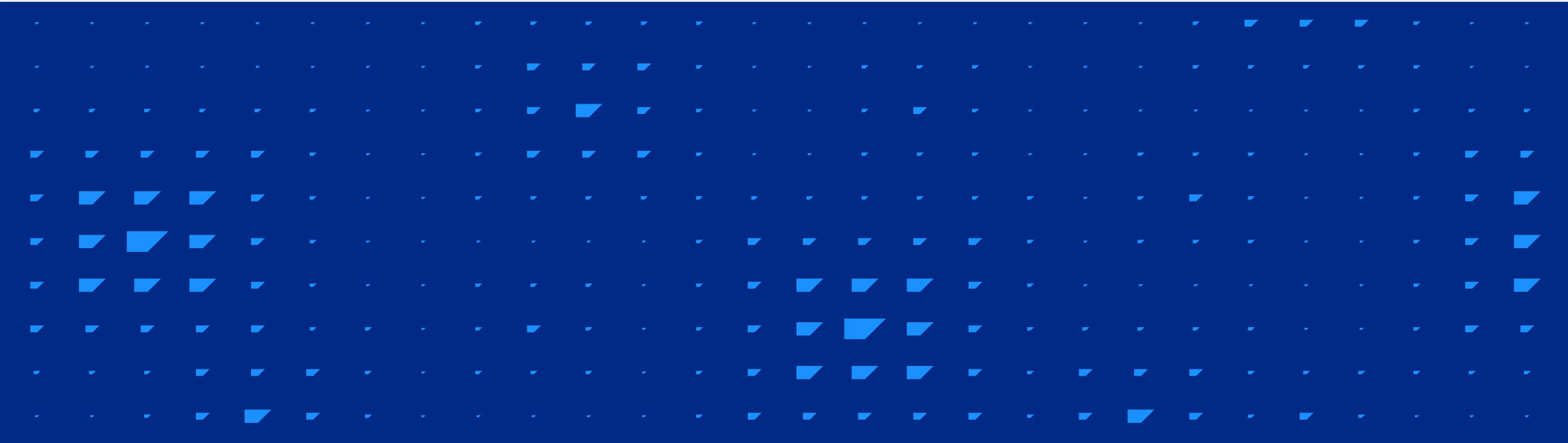
High-risk AI rules for Annex III systems apply

August 2028

High-risk AI rules for Annex I systems apply



Global AI Regulations



Broad US AI Regulatory Trends

1

Multiple layers of US regulation

AI-related requirements may arise from federal, state and local measures, alongside existing laws.

2

Evolving federal and state approaches

Federal and state approaches continue to evolve. The interaction between federal measures and state requirements requires ongoing assessment.

3

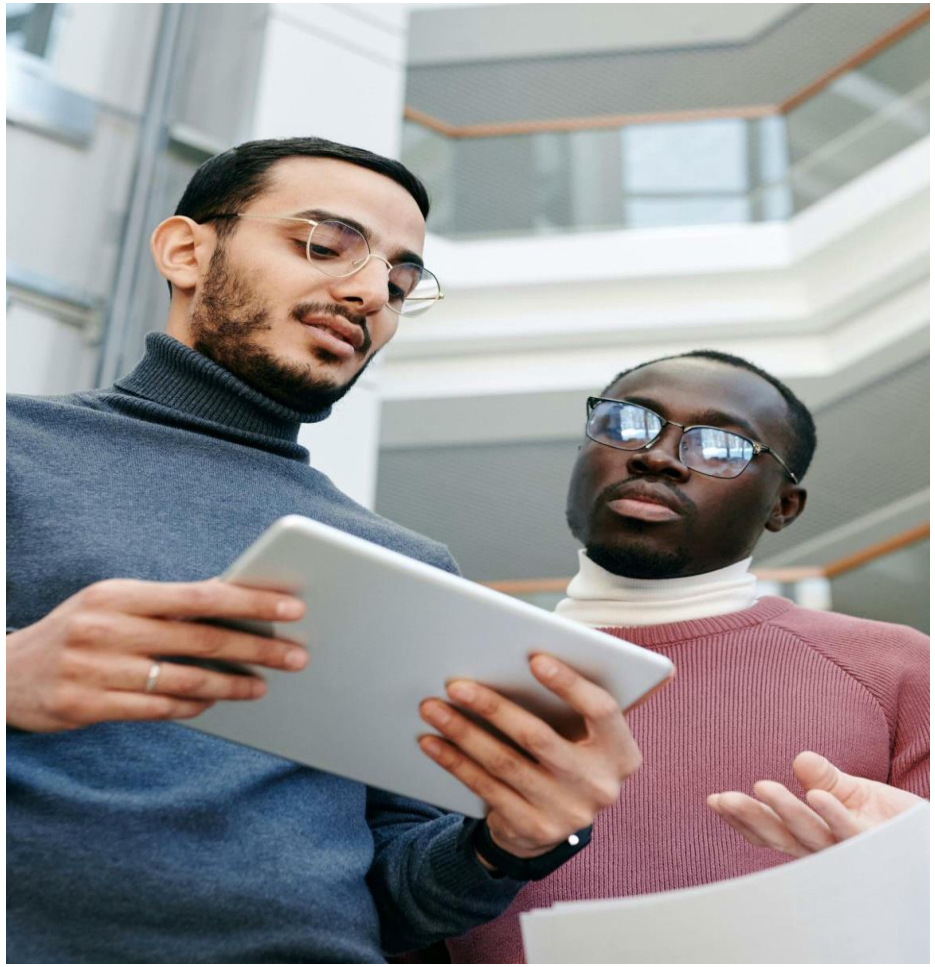
State legislative activity

State legislatures continue to consider AI-related proposals. A proposal does not create a binding obligation unless and until applicable requirements take effect.

4

Consumer and workplace considerations

Selected measures address disclosures, automated decisions and employment practices. Scope, duties and remedies differ across jurisdictions.



China AI Regulatory Framework

Examples of regulatory layers, applicability and status require assessment

The Evolving AI Regulatory Framework

AI Generated Content Labeling Measures
Focus on labeling of AI generated content

AI Ethics Review Measures
Applicability requires further assessment

Algorithm Recommendation Regulation
Focus on Recommendation Algorithms

Content Ecology Regulation
Focus on Content Moderation

Generative AI Interim Measures
Focus on generic requirements on Gen AI

Deep Synthetic Regulation
Focus on Deep Fake Technologies

AI umbrella framework: development referenced in source
Draft / policy development, not an established universal obligation

Foundation Information and Technology Regulations

PIPL (Personal Information Protection Law)
Focus on Privacy Protection

DSL
Focus on Data Management & Control

CCSL (China Cybersecurity Law)
Focus on IT “Infrastructure” Security

Telecom Industry Related Regulations
Focus on Telecom Service Qualification/Licenses

AI Regulations in APJ

Examples of Laws, Guidance and Initiatives



- Inclusion does not establish current legal status or applicability.
- Privacy, cybersecurity and automated decisions can involve different requirements, depending on the use case and entity role.
- Policy initiatives and guidance differ from binding duties. Draft and proposed items require a current-status check.

Japan

Law: AI Promotion Act (2025), phased application
National AI Strategy (2019)
AI Utilization Guidelines (2019)
Amendments to Copyright Act (2019, 2023 AI-generated works update)
AI Safety Institute (Feb 2024)
AI Operator Guidelines (Apr 2024)
Policy review: APPI / AI data processing (2025)

South Korea

Law: AI Basic Act (2025)
National AI Strategy
AI Regulatory Framework & Ethics Guidelines
AI Data Governance Framework
PIPA amendments (privacy & AI transparency obligations)

Vietnam

National AI Strategy (2021)
Draft cited in source: Digital Technology Industry (2024)
Regulatory Sandbox Framework
Law: Data Law (2025)

Want to Learn More?

Access Customer Resources at the SAP Trust Center here.

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