

HUMAN RIGHTS POLICY

1. Values, Commitment, Business of the Decathlon group and Decathlon Germany

As one of the leading companies in the sports industry, we move people through the wonders of sports. With that, one of our main goals is to make sports accessible to the many and contribute to a healthy society. DECATHLON's commitment is to do so while upholding its values of responsibility, vitality, authenticity and generosity by promoting sustainable development in all its activities. Therefore DECATHLON's due diligence strategy aligns with the Universal Declaration of Human Rights, to the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Right, and to OECD Standards and Principles for Responsible Business Conduct.

"Decathlon Germany" comprises all legal entities of Decathlon Deutschland SE & Co.KG as well as Decathlon Deutschland Logistik Vertriebs GmbH and is part of Decathlon S.E. Group ("Decathlon Group"). Our due diligence strategy at national level is based on what is established and constantly developed at the group level. With this approach, we contribute to a group-wide coherent due diligence strategy and to Decathlon's corporate responsibility worldwide. Our commitment, principles and key procedures are laid down in this human rights declaration, which is a living and dynamic document. It will be updated in accordance with new risk analyses, new findings and growing expertise.

In our role as a subsidiary with local autonomy, this human rights policy outlines primarily the human rights due diligence strategy of Decathlon Germany. For detailed information on the Decathlon Group's due diligence and sustainability commitments as well as its achievements please follow this <u>link</u>.

2. Business structure and due diligence processes of Decathlon Germany

Within the Decathlon Group, the core business model of Decathlon Germany is the retail of sports consumer goods and services on the German market. For that purpose, Decathlon Germany undertakes direct purchases - products that are bought to be resold on the German market - and indirect purchases - purchases and services necessary for the company's activities to function properly.

Within the scope of direct purchases, about 90% of the products sold on the German market are developed and procured by our French parent company. For the due diligence measures and processes of these products, Decathlon Germany therefore focuses on a close collaboration, alignment with and reliance on the French parent company's due diligence procedures.

For the remaining products in our range that we purchase locally as well as for all other purchases made at national level, Decathlon Germany has implemented and is continuously developing additional local human rights due diligence processes, following the principles of our parent company while adapting to our local context at Decathlon Germany, the human rights due diligence processes are supervised by the executive board and implemented by the human rights referent across functions and collaboration with all relevant internal teams such as HR, Purchasing, Safety, Compliance and others.

Our human rights due diligence processes comprise our values and commitment as a basis, our risk analysis processes, both abstract and concrete, as well as regular consultation with the Board on identified risks and our defined risk mitigation measures. This includes, for example, collaboration and agreements with our partners on these topics, communication and training, which is continuously developed, to ensure that all potential stakeholders are appropriately involved and sensitised.

Every teammate at Decathlon Germany is responsible for respecting human rights as outlined in this statement. The managing directors are responsible for ensuring that these principles are adhered to. We also expect our business partners to share our values, comply with human rights diligence in their supply chains and work with us to continuously develop the strategies to face these issues.

Finally, it is important to mention that human rights due diligence is a permanent process. Our aim is to develop our know-how and processes in accordance with what we learn on the way. Measures of our due diligence process are monitored continuously with regard to effectiveness and adapted accordingly. We do not claim to be perfect, but we are aware of the responsibility to evolve and contribute to the development in the field.

3. Our playing field areas in human rights

As a retail company and as a part of the Decathlon Group, we are aware of our responsibility to continuously develop our due diligence processes and to take all appropriate measures to identify and counter human rights risks related to our business activities.

With regard to both the supply chain of Decathlon Germany and of the Decathlon Group, following priority topics for our business operations have been identified - with varying weighings (see also the risk mapping of the Decathlon Group as well as the stakeholder analysis of the Decathlon Group in the <u>yearly Vigilance Plan</u>):

- Labour rights, particularly working hours, wages and benefits
- Child labour
- Forced Labour
- Freedom of association
- Respect and dignity
- No discrimination, and particularly gender equity
- Health and safety
- Environmental stress, particularly CO2 emissions

See our commitment to the environment here.

The priority topics and the findings of the risk analysis processes feed into the business decisions and strategies of Decathlon Germany, such as supplier selection and supplier management. They also provide the basis for further measures of risk prevention, mitigation and reduction and our reporting duty according to section 10 LKSG.

4. Key policies and procedures

While the respect and protection of human rights is not only the responsibility of companies but also depends on local contexts such as states and governments, we continuously work to improve our policies and practice in order to advance and strengthen our human rights due diligence in our business and our supply chains. We value partnership and transparency, both internally and externally with our suppliers. When it comes to the health and safety of people and our own playing field, we do not compromise. In our supply chain, we value strong partnerships with companies that share our values and vision on responsible production and services.

Decathlon Germany's human rights due diligence is a consequent evolution from the holistic human rights strategy of Decathlon Group. For the Decathlon Group human rights due diligence, please see the <u>Vigilance Plan and related documents</u>. Accordingly, some of the key procedures used at Decathlon Germany to ensure the respect and protection of human rights within the context of our business activities are:

- The clear definition of responsibilities for human rights due diligence management and the strategic placement by the board of directors
- Our grievance mechanism
- Our internal CoC and CoC for our partners
- Our human rights risk analysis through different tools (e.g. data-based analysis with- an external partner, pre-screening of business partners)
- Audit and transparency procedures to identify and process identified risks on a concrete level
- Various channels and methods of regular communication to gather information about the wellbeing of our employees, such as regular anonymous feedback surveys
- The continuous development of internal policies and practices to address identified risks and incorporate due diligence criteria into our processes, such as our purchasing policy, the investigation of internal and external grievances or incentives to support mental and physical wellbeing of our employees
- Communication and training on human rights
- Individual humanitarian projects

5. Handling of concerns and grievances

As part of a process of continuous improvement and an effort to listen, we have established a reporting and whistleblowing system for risks to people and the environment, both for our own operations and for external alerts.

These alerts are reported by stakeholders in our business ecosystem: teammates, customers and users, NGOs, communities and local residents, civil society, experts, media and social media, shareholders and funders, suppliers, subcontractors and service providers.

This can include studies and reports, publications, direct contacts, or reports via the alerting platform. In February 2019, Decathlon established an independent, multilingual whistleblowing tool:

- To guarantee the confidentiality of contacts and protection of whistleblowers;
- to ensure technical independence from other internal IT systems;
- to manage reports from start to finish;
- to improve processes, capitalise on good remediation practices;
- to obtain an overall view;
- to comply with national ethics regulations (corruption, human rights, etc.).

The "Whispli" platform is accessible internally (by teammates) via the intranet and externally (by customers, suppliers, civil society, etc.) via <u>THIS LINK</u>

Internal deployment means that it is accessible to all, and ensures communication and awareness-raising activities for teammates on:

- The connection with our values of responsibility;
- Ways to report concerns (e.g. via the hierarchy or the platform);
- Confidentiality and protection of whistleblowers when they use the platform.

Fore more information on the procedure of our external Whispli platform, please find our official workflow *here*.





