

Supplier Code of Conduct

At Sport Group and its affiliated companies (in the following: Sport Group), we are highly committed to upholding high ethical business standards, complying with legal requirements, caring for our employees' safety and well-being, and acting responsibly within the region we live and work in, such that it benefits society. We choose suppliers who share our commitment to good ethical practices and in return we strive to be fair and honest, firmly believing that relationships built on our core values will be sustainable and beneficial for all parties involved.

This Supplier Code of Conduct has been developed to incorporate the principles of Sport Group's Code of Conduct as well as international norms on human rights and the protection of the environment. We view our suppliers as partners and expect them to follow our core values and maintain the standards set forth in this Supplier Code of Conduct.

Sport Group defines suppliers as any organization or entity that directly provides goods and/or services to Sport Group. The Code is meant to act as a reference during our selection and retention of all suppliers that provide goods or services supporting our operations worldwide. While Sport Group understands and respects that there are different legal and cultural environments in which our suppliers conduct their businesses, this Supplier Code of Conduct will provide our sourcing organization with a foundation to assist in contracting decisions and supplier selection, and a framework by which to hold our suppliers accountable.

Legal compliance:

Suppliers must comply with all applicable legislation, including laws, regulations and legal requirements on human rights, labor standards, the environment, anti-corruption, and trade and customs. Sport Group expects its suppliers to comply with country-specific or local legislation, international norms, or Sport Group's specific standards, whichever standard is higher. Should conflicts arise between local legislation and international norms or Sport Group- specific standards, the supplier is expected to inform Sport Group immediately.

In accepting the Sport Group Supplier Code of Conduct the supplier confirms to comply with our supplier expectations regarding the following:

- 1. Human rights
- 2. Labor Standards
- 3. Safety
- 4. Environmental Responsibility
- 5. Responsible Mineral Sourcing
- 6. Anti-Corruption and Anti-Bribery
- 7. Subcontracting
- 8. Conflicts of Interest
- 9. Gift Exchange
- **10. Violations**



1. Human Rights:

The core of our effort to uphold ethical and sustainable business operations is the commitment to respect all people and their human rights. The appreciation of diversity and the creation of an inclusive organizational culture is a driving force of innovation and growth for us.

We are committed to respecting human rights by upholding the principles of the United Nations Universal Declaration of Human Rights. Human rights refer to the basic standards of treatment to which all people are entitled, including but not limited to economic, social, cultural, political, and civil dimensions. For us, this means ensuring that our products and services are provided under conditions that demonstrate respect for the people providing them and the people living in the communities around our operations, as well as those of our suppliers.

We recognize our responsibility to protect against human rights abuse throughout our operations and develop a culture which supports these principles: freedom, individuality, equality, citizenship, right to assemble, and health. Freedom includes but is not limited to freedom of speech and freedom of association as well as the right to collectively bargain. We expect our suppliers to comply with the human rights standards that we defined for our own operations.

We also recognize our responsibility to continuously improve our approach to protecting human rights, updating our practices and raising awareness of upcoming business practices and decisions containing human rights impacts. We maintain a zero-tolerance policy for human trafficking, child labor, and forced labor. We prohibit discrimination based on age, ancestry, color, religious creed, disability, marital status, medical condition, genetic information, national origin, race, sex, gender, gender identity, gender expression, sexual orientation, or any other characteristic protected by international, federal, state and/or local law.

Corporal retaliation and punishment as response to rightful conduct in line with any of the previously established human rights is prohibited. Disciplinary practices are to be justified and not to conflict with any human or labor rights.

2. Labor Standards:

Suppliers are expected to hire, compensate, provide benefits and access to training, promote, terminate and/or retire employees without regard to race, color, religion, national origin, political affiliation, union membership, marital status, pregnancy, age, disability, gender, gender identity, sexual orientation, or any other characteristic unrelated to the ability to do a job.

Suppliers are expected not to employ child labor. Sport Group will not knowingly engage a supplier that directly or indirectly through a third party employs child labor on the supplier's premises. We define "child labor" as work or service extracted from anyone under the age of sixteen (16), the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher.

Suppliers are expected not to employ forced, slave, convict, or bonded labor. Sport Group will not knowingly engage a supplier that directly or indirectly through a third-party employs forced, slave, convict or bonded labor on the supplier's premises. Suppliers are expected to not employ persons who were trafficked into employment on the supplier's premises or engage in human trafficking.



Suppliers are expected to provide their employees with compensation benefits and working hour schedules in compliance with all applicable laws and collective agreements. The legal maximum working hours are to be respected and strictly followed. Further to the local and regional legal standards, Sport Group expects from all its suppliers to ensure compliance with the relevant standards declared by the ILO (International Labour Organization). This includes but is not limited to the ILO conventions No. 1, No. 14, No. 30, No. 47, No. 116, and the ILO Tripartite Declaration. It shall be followed whichever standard is higher.

Appropriate pay in return for all conducted labor needs to be ensured. The national minimum wages are to be followed and respected. If the job requires on-site accommodation, appropriate living standards need to be ensured including but not limited to sufficient personal space and adequate sanitary facilities.

3. Safety:

As employer, we have a responsibility to maintain a safe, healthy and productive work environment for our employees and suppliers on our work sites. The protection of our employees, property, the public, and the environment are essential to the efficient and successful completion of every project we undertake. We believe that the prevention of injuries and incidents is more than just good business, it is our moral obligation. We expect our suppliers to themselves maintain the safety and health of their employees and the environment they operate in.

4. Environmental Stewardship

Sport Group is committed to act sustainably, in an environmentally responsible manner, and protect the environment. Our goals are to the conservation of natural resources and the protection of water, air, land, and biodiversity.

Suppliers must comply with all environmental requirements specific to the products or services provided as described in design and product specifications, contract documents, and within the parameters of our environmental standards. Suppliers are expected to establish an appropriate environmental management system including the definition of concrete goals and appropriate mechanisms to monitor the reduction of their environmental footprint.

In procuring raw materials, suppliers are expected to verify that all materials used in the manufacture of Sport Group products or sale of products to Sport Group were sourced in compliance with all applicable environmental laws, regulations and legal requirements. To ensure safe handling, movement, storage, recycling, reuse, and disposal, Suppliers are expected to identify and manage substances that pose a hazard if released to the environment and comply with applicable labeling laws and regulations for recycling and disposal.

5. Responsible Material Sourcing:

Sport Group does not tolerate the use of raw materials that directly or indirectly contribute to armed conflict or human rights abuses in any of its products. Suppliers must take reasonable steps to ensure that the products they provide do not contain Conflict Minerals as described by the "OECD Due



Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas"

6. Anti-Corruption and Anti-Bribery:

Suppliers must comply with all laws and legal acts regarding anti-corruption and anti-bribery enforceable in the jurisdictions in which they conduct business. We strictly prohibit illegal payments, or promises to provide anything of value, to a Foreign Government Official (FGO) which are designed to gain an illegal business advantage (Bribe), including but not limited to, inappropriate payments made directly or indirectly to an FGO. We require that our books, records, and accounts are kept in reasonable detail and that all transactions are accurately and fairly reflected in accounting records. These standards apply to our employees, suppliers, and any stakeholder acting on Sport Group's behalf. We maintain a zero-tolerance policy for bribery or violation of our anti-bribery and anti-corruption policy. We expect that our suppliers will not directly or indirectly offer, pay, promise to pay, or authorize the payment of any money, or offer, give, promise to give, or authorize the payment of any money, or offer, give, promise to give, or authorize the payment of any money, or offer, give, promise to give, or authorize the payment of any money, or offer, give, promise to give, or authorize the payment of any money, or offer, give, promise to give, or authorize the payment of any money, or offer, give, promise to give, or authorize the payment of any money, or offer, give, promise to give, or authorize the payment of any money, or offer, give, promise to give, or authorize the payment of any money, or offer, give, promise to give, or authorize the payment of any money, or offer, give, promise to give, or authorize the payment of any money, or any person, including any official or employee of any government, or any person acting in an official capacity for or on behalf of any such government for the purpose of

- influencing or rewarding any act or decision of such person, official, employee, party or candidate, or
- inducing such person, official, employee, party or candidate to do or omit to do any act in violation of his or her lawful duty, or
- inducing such official, employee, party or candidate to use its or his/her influence with a foreign government or instrumentality thereof to affect or influence any act or decision of such government or instrumentality, or
- securing any improper advantage for the supplier.

Similarly, Sport Group prohibits the facilitation of payments and we expect our suppliers to never make such payments on Sport Group's behalf.

7. Subcontracting:

Suppliers are expected to hold their subcontractors and suppliers accountable to principles in line with this Code.

8. Conflicts of Interest:

Suppliers must conduct business in an open, transparent, and supportive way that supports fair business opportunities. We expect suppliers to prevent any actions or conditions that could result in a conflict of interest, the appearance of a conflict of interest, or that may compromise the exercise of independent judgment during the execution of work for Sport Group or on Sport Group's behalf.

9. Gift Exchange:

Accepting or giving gifts can create a sense of obligation or preferential treatment. Therefore, and to avoid such conflicting situations, we discourage our suppliers from exchanging gifts with Sport Group members.



10. Violations:

A supplier who violates the Supplier Code may be terminated. We do not consider suppliers who do not demonstrate high ethical standards, compliance with applicable laws, and the Sport Group Supplier Code of Conduct. We strongly encourage any ethical or legal misconduct or violations of Sport Group's Supplier Code of Conduct to be reported to our Sport Group legal department (<u>Supplier.CoC@sportgroup-holding.com</u>). All information will be treated highly confidential.