

CODE OF CONDUCT



2024

REVISION LOG

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Content

1. DUE DILIGENCE REQUIREMENTS	4
2. INTERNATIONAL STANDARDS AND GUIDELINES	5
3. HUMAN RIGHTS AND LABOUR RIGHTS	5
3.1 Child labour and young workers	5
3.2 Forced labour	6
3.3 Employment conditions	6
3.4 Inclusion & Diversity	6
3.5 Discrimination and harassment	6
3.6 Sustainability & Environmental Considerations	7
3.7 Freedom of association and collective bargaining	7
3.8 Supplier Management & Ethical Trade	7
3.9 Working hours and leave	7
3.10 Wages and benefits	7
3.11 Update Chemical Policy	8
3.12 Occupational health and safety	8
4. ENVIRONMENT	8
4.1 General provisions	8
4.2 Chemicals	8
4.3 Water resources	9
4.4 Air quality and climate	9
4.5 Waste management	9
5. ANTI-CORRUPTION	9
6. ANIMAL WELFARE	9
7. CRISIS MANAGEMENT & EMERGENCY PLANS	10
8. GRIEVANCES	10
9. COLLABORATION AND MONITORING	10
10. GOVERNANCE AND ACCOUNTABILITY	11
10.1 UPDATES AND AMENDMENTS	11
11. SIGNATURES	12

To whom it may concern,

We are committed to running a responsible and sustainable business. Ensuring that our products are produced under responsible conditions stands at the core of this commitment, and in fulfilment of our ambition, we expect our partners – suppliers, subcontractors, agents, and other business partners – to operate responsibly and act with integrity, fairness, and responsibility in all aspects of their business.

Our commitment implies having in place processes for preventing and addressing adverse impacts on human and labor rights, the environment including climate, anti-corruption, and animal welfare. We use this Code of Conduct to support us in selecting and retaining business partners who share our commitment of responsible and sustainable production which is defined by internationally agreed conventions, standards, and guidelines.

We ask our business partners to commit to implementing the standards, processes, and requirements of this Code of Conduct in their own operations and to work with their suppliers and business partners to also implement the policies, standards, and processes of the Code.

We recognize that establishing the required standards and processes outlined in this Code of Conduct require both time and resources. We focus on our suppliers' ability and willingness to demonstrate continuous improvements in meeting the requirements of the Code, and in improving their systems to manage adverse impacts on human and labor rights, the environment including climate, anti-corruption, and animal welfare. We feel confident that cooperation and transparent dialogue can result in a more sustainable and efficient partnership from which both parties will benefit.

The standards of the Code of Conduct are based on internationally agreed conventions, including but not limited to: the International Bill of Human Rights, the International Labor Organization's (ILO) Declaration of the Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the OECD Due Diligence Guidance for Responsible Business Conduct, the UN Convention Against Corruption, the Rio Declaration on Environment and Development; and the UN Global Compact's 10 Principles.

All suppliers are expected to comply with national legislation, regulations, applicable practices, and industry standards as relevant to their business.

Please refer to the enclosed Code of Conduct for more information about the specific requirements. If you have any questions regarding this letter, our Code of Conduct, or our responsible supply chain management programme in general, please do not hesitate to contact our offices.

With kind regards,

SPORTS GROUP DENMARK 

SCOPE

The requirements of this Code extend to all factories being part of the production and processing of Sports Group Denmark products and all employees working at these facilities, regardless of their status or relationship with the supplier. This includes workers who are engaged informally, on short-term contracts or on a part-time basis.

Where there are differences between the terms of this Code of Conduct and national laws or other applicable standards, suppliers must adhere to the higher requirements. If conflicts between national law and this Code of Conduct are detected, suppliers must inform us immediately.

OBJECTIVES

This policy outlines our company's approach to identifying, preventing, and mitigating risks related to forced labour within our operations and supply chains. The policy will help us in meeting international guidelines and legal obligations prohibiting forced labour. These include but are not limited to:

- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises/ OECD's Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector. The guidelines include but are not limited to only these, and cover all products produced by Sports Group Denmark
- The International Labour Organization (ILO) Conventions specially, but not limited to: Forced Labour Convention no. 29, Abolition of Forced Labour Convention no. 105 and Worst Forms of Child Labour Convention no. 182
- National laws obligations:
 - United Kingdom Modern Slavery Act (2015) (in force)
 - US Uyghur Forced Labour Prevention Act (UFLPA) (in force)
 - The California Transparency in Supply Chains Act (in force)
 - Australian Federal Modern Slavery Act 2018 & New South Wales Modern Slavery Act 2018 (in force)

1.DUE DILIGENCE REQUIREMENTS

International guidelines call on businesses to exercise due diligence to detect, prevent, and mitigate any adverse impacts related to human and labor rights, the environment including climate, and anti-corruption. These procedures are required for all groups, individuals, and entities that a company may impact, within all company and production units, the local community, and the external environment.

Key steps of the due diligence procedures include developing policies within all relevant potential and actual impact areas in the business, such as health and safety, environmental protection, chemical management, and anti-corruption. Such policies must be communicated to all employees and other relevant stakeholders. Procedures and management systems must be developed to ensure that policies are implemented and adhered to and thereby ensuring that any potential and actual adverse impacts are prevented and mitigated.

The standards of this Code of Conduct fall in below four sections, covering four thematic areas. Each section defines a set of specific standards within the four areas. While a due diligence process may identify further areas of concern, the following define standards on topics of relevance for processes in the production of textiles, garments, and footwear. The standards constitute minimum standards that all suppliers must meet and are based on above listed international conventions, standards and guidelines.

1. Human and labour rights
2. Environment and climate
3. Anti-corruption
4. Animal welfare

Commitment to Due Diligence

We are committed to implementing and maintaining effective due diligence processes to identify, prevent, mitigate, and account for adverse impacts on human rights, labour rights, the environment, and ethical business practices throughout our value chain. This commitment is integrated into our corporate values, culture, and management systems.

Identifying and Assessing Adverse Impacts

We conduct regular risk assessments to identify potential and actual adverse impacts on human rights, labour practices, and the environment across our supply chain and value chain. This includes mapping suppliers, using credible third-party sources, stakeholder engagement, supplier audits, and supplier engagement.

Preventing and Mitigating Adverse Impacts

If potential and actual adverse impacts are identified, we take immediate steps to cease, prevent, or mitigate these impacts. We collaborate with our suppliers to develop action plans for addressing issues and improving practices, following the principle of engagement and transformation rather than disengagement.

2.INTERNATIONAL STANDARDS AND GUIDELINES

Our commitment to responsible business conduct is guided by international standards and guidelines, including:

- The International Bill of Human Rights
- The International Labor Organization's core conventions
- The UN Guiding Principles on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises
- The OECD Due Diligence Guidance for Responsible Business Conduct
- The OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector

3.HUMAN RIGHTS AND LABOUR RIGHTS

3.1 CHILD LABOUR AND YOUNG WORKERS

Suppliers must not use child labor below the age of 15, even if permitted by national law. All legal limitations regarding young workers between the age of 15 and 18 must be followed and young workers are only permitted to carry out light work at reduced hours. This means that they must be protected from any hazardous work, night shifts, and any kind of work that might hamper their physical and psychological development or impose any harm.

We will collaborate with local NGOs and authorities to strengthen efforts against child labour. This includes participating in joint initiatives, sharing best practices, and supporting programs that promote children's education and development.

If child labour is discovered, suppliers should develop and implement a plan to support the child's education and development. This may include providing financial support to the child's family, ensuring access to educational opportunities, and working with local organizations to improve the child's situation.

If child labor is detected at a facility, the supplier is responsible for developing, participating in, and contributing to policies and programmes that provide for transitional arrangements to enable the child to remain in quality education until no longer a child.

3.2 FORCED LABOUR

Suppliers must adhere to international principles of responsible recruitment, including the Employer Pays Principle, and require the same from their recruitment partners, when engaging and recruiting all workers, either directly or indirectly, especially members of vulnerable groups such as temporary and migrant workers. As a minimum, this includes:

- No recruitment fees and costs are charged to workers
- Clear and transparent employment contracts
- Workers' freedom from deception and coercion
- Freedom of movement and no retention of identity documents
- Access to free, comprehensive, and accurate information
- Freedom to terminate contract, change employer, and safely return
- Access to free dispute resolution and effective remedies

Employment must be freely chosen. Suppliers must not use or support any form of slavery or forced and bonded labor. Employees must not be subject to recruitment fees or deposits, withholding salary and benefits, lodging of personal documents by the employer, or forced to work overtime.

Suppliers should implement best practices to prevent forced labour, which may vary depending on the region. For example, suppliers in Asia should focus on ensuring that recruitment processes are transparent and fee-free, while suppliers in Africa should focus on ensuring that workers have access to their identity documents and are not held through debt bondage.

3.3 EMPLOYMENT CONDITIONS

Obligations to employees under international conventions and social security laws and regulations arising from the regular employment relationship must not be avoided by using short-term contracts, such as contract labor and casual labor.

All employees, including temporary and casual workers, must have written and legal employment letters in a language they understand, specifying conditions of employment and termination.

3.4 INCLUSION & DIVERSITY

Suppliers must promote an inclusive and diverse workplace. This includes implementing training programs, fair recruitment practices, and guidelines for handling discrimination and harassment to foster a positive work environment.

3.5 DISCRIMINATION AND HARASSMENT

Suppliers must not engage in or support discrimination in recruitment and employment. Decisions about hiring, compensation, access to training, advancement, discipline, termination, or retirement must be solely based on the ability to perform the job and not on the grounds of gender, marital or parental status, pregnancy, race, caste, color, age, sexual orientation, religion, political opinion, union membership, function as worker representative, nationality, ethnic origin, health status, or disability.

All workers must be treated with respect and dignity. Suppliers must never engage or support the use of bullying, intimidation, violence, threats of violence, corporal punishment, or physical, sexual, psychological, and verbal harassment or abuse. Procedures to ensure punitive measures in cases of harassment and/or discrimination must be put in place. Special measures must be put in place to protect female workers against gender-based violence and harassment at the workplace.

3.6 SUSTAINABILITY & ENVIRONMENTAL CONSIDERATIONS

Suppliers are required to adopt sustainable practices, such as waste management, energy savings, and eco-friendly procurement. This includes using recycled materials and reducing carbon emissions to minimize environmental impact.

Suppliers should set specific goals and timelines to achieve sustainability objectives, such as reducing carbon emissions by 20% within the next five years and increasing the use of recycled materials by 30% within the next three years.

3.7 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Suppliers must respect the rights of workers to join and organize associations of their own choosing and to bargain collectively with no interference or sanctions from employers. The supplier must implement mechanisms, such as worker participation committees, for resolving disputes, including employee grievances, and ensure effective communication with employees and their representatives.

If the rights to freedom of association and collective bargaining are restricted by national law, the supplier must allow workers to freely elect their own representatives, and alternative forms of worker representation must be supported.

3.8 SUPPLIER MANAGEMENT & ETHICAL TRADE

Suppliers must adhere to guidelines for supplier management and ethical trade. This includes requirements for social and environmental responsibility and procedures for audits and monitoring to ensure ethical practices throughout the supply chain.

3.9 WORKING HOURS AND LEAVE

Standard working hours must follow local regulations, collective bargaining agreements and industry standards, but must not exceed 48 hours per week, excluding overtime. All overtime must always be consensual and not requested on a regular basis. Weekly overtime must not exceed 12 hours.

Employees must be allowed a minimum of 1 day off per week and paid annual leave. Maternity leave, sick leave, and other types of leave must be provided to all employees in accordance with relevant local regulations.

3.10 WAGES AND BENEFITS

Wages for a standard working week must at a minimum meet the legal minimum wage, industry standards or negotiated wages, whichever is higher. Wages must be paid regularly and in a timely manner.

Suppliers should work towards providing a fair living wage, implying that wages are enough to meet the basic needs of employees and their families and provide some discretionary income. All overtime work must be compensated at a premium rate which is recommended to be no less than 125% of the regular pay rate.

Deductions are only permitted if and to the extent prescribed by law or fixed by a collective agreement. It may not be used as a disciplinary practice.

3.11 UPDATE CHEMICAL POLICY

The chemical policy must be expanded to include new regulations and best practices for handling hazardous substances. This includes guidelines for using PFAS-free materials and documenting chemical management to ensure compliance and safety.

3.12 OCCUPATIONAL HEALTH AND SAFETY

A safe and hygienic working environment must be provided for all employees.

To prevent accidents and injuries and promote a healthy and safe work environment, suppliers must – at a minimum – ensure that below listed initiatives are in place. The list is not exclusive but outlines the most critical aspects of a health and safety management system. Special measures must be put in place to ensure a gender-sensitive approach.

- Management representatives for occupational health and safety.
- Incident and risk management procedures proportionate to the type and size of business.
- Health and safety training on occupational risks. This includes training in firefighting and handling hazardous materials and chemicals.
- Provision of appropriate personal protective equipment (PPE), free of charge and in good condition. Training in the proper use of the PPE must be provided.
- All premises on site, including company-provided dormitories, restrooms, changing rooms and canteen, shall uphold appropriate standards on hygiene, health, and safety. This includes adequate equipment for fire safety.
- Access to clean drinking water and access to sanitary facilities for employees at all times.
- Regarding safe and healthy buildings all relevant permits and certificates should be kept for review. Safe electrical installations must be installed and maintained by competent personnel.

4. ENVIRONMENT

4.1 GENERAL PROVISIONS

Suppliers must conduct all operations in full compliance with all applicable environmental laws and regulations. This includes obtaining and maintaining all necessary registrations, permits, and licenses, including but not limited to below listed areas. Moreover, suppliers must have procedures and capabilities in place to ensure that they prevent and mitigate negative environmental impacts from their activities, or associated activities. At a minimum, procedures and capabilities must be in place for below listed issues. We expect that our suppliers will request their supply chain to comply with these requirements.

4.2 CHEMICALS

Suppliers must conduct their operations in accordance with below requirements on chemicals:

- The European Union REACH Regulation (EC) No 1907/2006 Annex XVII and later amendments.
- The “substances of very high concern” (SVHC) i.e., the European Union REACH Regulation (EC) no. 1907/2006 Candidate List. Suppliers are requested to check the list on a regular basis as this list is continuously updated, Country specific regulations on export markets.

Local laws must be followed in the storage, handling, use and disposal of all chemicals and must comply with the Material Safety Data Sheet (MSDS) for each chemical product.

4.3 WATER RESOURCES

Suppliers must carry out all operations in full compliance with all applicable laws, regulations, and industry guidelines on water conservation, water quality, and wastewater.

Measures must be put in place to clear wastewater. Suppliers should work towards minimizing the use of water during production processes, including introducing water saving techniques and waste-water recycling. This is particularly pertinent for suppliers with wet processing. However, suppliers without wet processes are also expected to manage and measure water consumption.

Suppliers should work towards measuring the impact of their operations on the local/regional water supply to avoid negative contribution to water stress.

4.4 AIR QUALITY AND CLIMATE

Suppliers must reduce and control emissions to air according to applicable regulations. This includes noise, odour, and dust emissions.

Suppliers should work towards mitigating negative impact on climate change by carrying out the following measures: Implementing energy efficiency measures in the value chain starting with high-impact processes as using renewable energy sources if available, and further calculating emissions and setting targets to reduce the emissions using recognized standard-setting tools.

4.5 WASTE MANAGEMENT

All waste must be managed responsibly and as a minimum according to applicable regulations. Hazardous waste must be handled by an authorized company/organization.

Suppliers should minimize waste during production processes going to landfill, facilitate collection of waste to be re-used, reduce use of virgin raw materials, and optimize use of re-cycled materials. The goal should be no waste to landfill.

5.ANTI-CORRUPTION

Suppliers are expected to act according to high ethical standards and with integrity in all matters related to their business and have adequate procedures to prevent corruption in their operations.

No form of corruption, extortion, kickbacks, facilitation payments, or bribery must be offered, received, or promised.

6.ANIMAL WELFARE

Suppliers are expected to ensure that materials used in the products derive from animals that have been treated according to all applicable regulations, conventions, and standards. The animals must be fed and treated with dignity and respect. No animal must deliberately be harmed nor exposed to pain in their lifespan.

Taking the lives of animals must always be conducted using the quickest and the least painful and non-traumatic method available. Further to this, it must be approved by national and acknowledged veterinarians and only conducted by trained personnel.

When using materials that derive from animals, the supplier should be ready to document the chain of custody of the product, e.g., via existing credible third-party certifications schemes such as the Responsible Down Standard (RDS) and the Responsible Wool Standard (RWS).

7. CRISIS MANAGEMENT & EMERGENCY PLANS

Suppliers must develop clear procedures for crisis management and emergency plans. This includes guidelines for handling natural disasters, pandemics, and other emergencies to ensure business continuity and employee safety.

8. GRIEVANCES

Suppliers must have a grievance mechanism in place allowing stakeholders to voice their concern if they find that operations of the supplier are adversely affecting human and labor rights, environment including climate, anti-corruption, and animal welfare. The grievance mechanism should be appropriate to the size of the company and can take the form of a whistle-blower function, worker representation committee, etc. The grievance mechanism should be widely communicated and accessible to all workers (including temporary workers) and managed in a confidential, unbiased, timely, and transparent manner.

9. COLLABORATION AND MONITORING

Sourcing, suppliers, and subcontractors

Transparency and traceability are essential for us to work towards a more responsible and sustainable supply chain.

As a minimum, we expect our suppliers to show transparency by disclosing information on their production units and subcontractors upon request. In addition, to facilitate traceability in our supply chain, suppliers should be prepared to document the origin of material through a validated chain of custody.

Open and transparent dialogue on the standards of this Code of Conduct is essential for our relationship with our suppliers. As part of this, suppliers are expected to inform about all sub-contractors. Hidden factories are not accepted. Suppliers are expected to exercise appropriate due diligence in their supply chain and work with their suppliers and subcontractors to ensure that they also conduct their operations in line with the principles of this Code of Conduct. Raw material, substances or components must always be sourced from manufacturers who support practices that ensure compliance with the principles mentioned in this Code of Conduct.

All suppliers are evaluated against the standard of the Code, and we prioritize those suppliers who are committed to demonstrating compliance and continued improvements.

Suppliers should regularly report on their compliance with the code and participate in evaluations to ensure they meet the established standards. This includes annual self-assessments, internal audits, and third-party audits.

Suppliers are evaluated through different types of assessments, including self-assessments, internal assessments, and third-party assessments (announced and unannounced). We and appointed third-party auditors must be granted access to all facilities, including sub-contractors, as well as relevant documents and employees as requested.

We trust that our suppliers will embrace the requirements of this Code. In those instances where a supplier needs to improve certain procedures and practices, the supplier must be committed to do so within a specific time frame. We believe that achieving good social and environmental standards is a process, and we are committed to working together with our suppliers in their efforts.

If a supplier demonstrates lack of commitment and will to engage and improve on the standards of this Code, we will not hesitate to terminate the business relationship.

10. GOVERNANCE AND ACCOUNTABILITY

The Board of Directors are responsible for overseeing the implementation of this policy, ensuring that due diligence processes are integrated into our business strategy. The risk management in SGD is responsible for managing the day-to-day implementation of this policy, including risk assessments, monitoring, reporting, and remediation efforts.

This policy will be reviewed annually to ensure it remains relevant and effective in addressing risks within our operations and supply chain, as well as complying with the latest legal requirements. We will seek feedback from stakeholders, industry experts, and legal advisors to continuously improve our due diligence processes.

10.1 UPDATES AND AMENDMENTS

Sports Group Denmark reserves the right to make updates and amendments to this Code of Conduct (COC) to ensure it remains relevant and in compliance with applicable laws and best practices. The document is subject to ongoing adjustments, and we will send corrections to the existing document to our suppliers.

If you, as a supplier, disagree with the proposed changes, you must object to the corrections within a reasonable timeframe. This will ensure that we do not need to obtain signatures every time changes are made, but instead can obtain signatures every other year from existing and ongoing suppliers.

11.SIGNATURES

According to Sports Group Denmark's Code of Conduct, you have agreed to comply with all terms and conditions in the Code of Conduct including all Appendixes, this letter can be used as documentation of a breach of the agreement.

This agreement is between:

Sports Group Denmark A/S, is a company incorporated under the laws of Denmark, registered under the Company CVR no. 34704074 and with its registered address at Skaerskovgaardsvej 5, 8600 Silkeborg, Denmark.

And Supplier:

[.....] is a company incorporated under the laws of registered under the company
Vat No. [.....] and with its registered address at: [.....]

Below signatures verifies to the Code of Conduct, according to the terms and conditions / version 2024.

For and on behalf of

SPORTS GROUP DENMARK 

Name: Heidi Langergaard Kroer
Title: Supply Chain Manager



Signature

For and on behalf of

Date: [.....]
Name: [.....]
Title: [.....]

Signature