

Policy Statement

Preamble

The focus of our actions are people and nature, always in the balance of social responsibility, ecology and economy. Our Policy Statement is based upon this premise, and outlines the most important principles and rules for all our activities - transparently, openly and bindingly.

I. Business practices

1. Compliance with the law

Compliance with all legal and statutory regulations is a matter of course for us, as is compliance with internationally recognized standards for good and responsible corporate governance and supervision. In this respect, the stricter of the internal and national regulations always takes precedence.

2. Fair Competition

We resolutely oppose any anti-competitive agreements with our business partners and suppliers and agreements that violate cartel law.

3. Avoiding conflicts of interest

Employees should avoid all situations in which personal interests conflict with the interests of the Deuter Sport GmbH. In the event of a conflict of interest, all employees must inform the company.

4. Protecting company property

We shall utilize company property and resources appropriately and considerately. This also means that we will protect company property against loss, theft, misuse and damage. This also refers explicitly to the intellectual property of the Deuter Sport GmbH, which we shall protect against unauthorized third-party access.

5. Money laundering prevention

We comply with all legal specifications for the prevention of money laundering and shall take all necessary measures to prevent money laundering within the Deuter Sport GmbH.

6. Corruption

We resolutely oppose the direct or indirect offer, promise or guarantee of benefits to officials or business partners in Germany or abroad in order to attain a behavior or decision that is favorable to Deuter Sport GmbH. Our employees shall not accept the promise of benefits, nor shall they accept any benefits, as this might give the impression that employees can be influenced when it comes to business decisions. We condemn any form of corrupt actions and bribery.

7. Public appearance and communication

All employees have the right to freedom of expression. Personal rights and privacy shall be protected. We shall always be aware that, as employees, we are perceived by the public as representatives of the company when we make comments about the Deuter Sport GmbH.

8. Political lobbying

We resolutely oppose undue influence upon politics and legislation.

9. Transparency in donations and sponsorships

We shall be transparent in our donations and other forms of social commitment.

10. Protection of confidential information

Confidential information is valuable. Unauthorized disclosure can cause significant damage to the Deuter Sport GmbH. We protect confidential information and company documents from unauthorized viewing and unauthorized access. Our employees shall observe their duty of confidentiality, even in their private lives and when using social networks.

11. Guaranteed data protection and data security

All employees have the right to data protection. We protect personal data, in particular the data of employees, customers and suppliers, by handling it carefully and responsibly, and we process it in accordance with applicable data protection regulations. This naturally includes implementing the relevant technical and organizational measures to secure all company, customer, supplier and personal data against unauthorized access, unauthorized and improper use, loss and premature destruction.

II. Procurement practices

We value long-term partnerships built on trust and mutual respect. This is true at our headquarters, with our distributors and, of course, with our production partners. We are in close contact with our suppliers and rely on long lead times and joint pricing. We are expressly committed to the ILO Core Labour Standard¹ and the Code of Labour Practices² of the Fairwear Foundation. We implement these consistently and also demand this from all our suppliers. We recognize the climate crisis and environmental degradation as a risk and commit ourselves and our suppliers to minimize the impact on our environment and to continuously reduce greenhouse gas emissions. We base our due diligence and risk analysis on the OECD guidelines³. We see it as our duty to counteract negative impacts preventively, but should negative impacts nevertheless occur, we are committed to mitigating and remediating them. In particular, we are committed to protect the rights of vulnerable groups such as children, refugees, women, migrant workers, and ethnic and religious minorities.

¹ International Labour Organisation - International Labour Standards
<https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12000:0::NO::>

² Fairwear Foundation - Code of Labour Practices
<https://api.fairwear.org/wp-content/uploads/2016/06/fwfcodeoflabourpractices.pdf>

³ OECD - Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector
<https://www.oecd-ilibrary.org/docserver/9789264290587-en.pdf?expires=1621429311&id=id&accname=guest&checksum=2088512431F00DF5B188516F59B4437B>

1. Forced labour

There shall be no form of forced or compulsory labour. Forced or compulsory labour is any form of service that is required of a person under threat of any penalty and for which the person has not volunteered. Human trafficking is prohibited. (ILO Convention 29, 105 and 182)

2. Child labour

No child younger than 15 years of age or under the age of compulsory school attendance may be employed, whichever is greater. Youth workers (15-17 years of age) may not perform work that, given their circumstances, is detrimental to health, safety or morale. (ILO Convention 138 and 182)

3. Discrimination, sexual harassment, gender specific violence

Each person shall be treated with respect and dignity. No employee shall be the target of physical, sexual, psychological or verbal harassment or abuse, monetary penalties, or degrading actions as a disciplinary measure. No person shall suffer discrimination in any aspect of employment, including recruitment, hiring, compensation, benefits, work assignments, access to training, advancement, disciplinary action, termination, or retirement on the basis of race, religion, color, sex, pregnancy, birth age, national origin, ancestry, sexual orientation, physical or mental impairment, medical condition, disease, genetic characteristics, family support, marital or socioeconomic status, political opinion, union membership, ethnic group, and all others protected under the law. All hiring decisions must be based on the principle of equal employment opportunity and shall include effective mechanisms to protect migrant, temporary or seasonal workers against any form of discrimination. (ILO Convention 100 and 111)

4. Wages/Living wages

Every worker has the right to be paid sufficiently for a regular work week to meet the basic needs of workers and their families and to provide some disposable income. (ILO Convention 26 and 131)

5. Overtime

The working time of employees may not exceed the regular working time plus overtime allowed by law. The regular working time may not exceed 48 hours per week or the maximum given by law, whichever is lower. In a seven-day week, employees must receive at least one break of at least 24 consecutive hours. All overtime must be mutually agreeable. The total of regular and overtime hours may not exceed 60 hours in a week, or the maximum allowed by law, whichever is less. Overtime shall not be required on a regular basis and shall be compensated at a premium rate. (ILO Convention 1)

6. Health and safety

Employers are required to provide safe and healthy working conditions to prevent accidents or adverse health effects resulting from work or the work environment. Employers must proactively address health and safety issues and implement effective policies, systems and trainings to prevent accidents and injuries and protect workers' health. (ILO Convention 155)

7. Freedom of association and collective bargaining

Workers must be granted the right to join independent organizations of their choice. Freedom of association and collective bargaining must be recognized and respected. An effective grievance mechanism must be available to all employees to resolve internal disputes, employee grievances and to ensure effective, respectful and transparent communication between employees, their representatives and management. (ILO Convention 87, 98 and 135)

8. Legally binding employment relationship

Obligations to employees under labour or social security laws and regulations arising from regular employment shall not be avoided through the use of labour-only contracting arrangements or through apprenticeship schemes where there is no real intent to teach skills or provide regular employment. Younger workers shall be given the opportunity to participate in education and training programs.

9. Animal welfare

Animal welfare must be respected. Likewise, progressive efforts must be made to establish humane and healthy practices towards animals based on the best available technologies and standards.

10. Hazardous chemicals

The use of hazardous chemicals is to be minimized. Where this is not possible, the use as well as the disposal must be organized according to the best available technologies and standards.

11. Water

Responsible consumption of water and prevention of water pollution shall be ensured according to the best available technologies and standards, taking into account local legislation.

12. Greenhouse gas emissions

We are committed to reduce greenhouse gas emissions that are within our scope of responsibility so that we are compliant with the 1.5° target of the Paris Climate Agreement⁴.

⁴ United Nations - The Paris Agreement
https://unfccc.int/sites/default/files/resource/parisagreement_publication.pdf

III. Subcontractors

Deuter has achieved full transparency about subcontractors in its direct supply chains. Wherever subcontractors are used, the minimum requirements for cooperation in terms of fair labour practices apply. If a supplier wishes to use a subcontractor, this must be made transparent in advance and agreed on with Deuter. Each subcontractor must accept the Code of Labour Practices⁵ and confirm it with a signature. Access to the Fair Wear Foundation complaint system must also be guaranteed. The mandating supplier agrees to make annual inspection visits to monitor compliance with the provisions.

Adopted by the managing director



Robert Schieferle

⁵ Fairwear Foundation - Code of Labour Practices
<https://api.fairwear.org/wp-content/uploads/2016/06/fwcodeoflabourpractices.pdf>