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Code of Conduct

for Supply Chain Participants

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This DEICHMANN Code of Conduct, Version 2026, includes the amfori BSCI Code of Conduct, Version v.2021. The DEICHMANN Group has recognised the amfori BSCI Code of Conduct and adapted it to its own layout in order to contribute more effectively to the BSCI cascading effect



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Preamble

We, the DEICHMANN Group, are committed to continuing to take responsibility for the social and environmental compatibility of our worldwide activities. In order to make our position clear to the participants in our global supply chains, we have created this DEICHMANN Code of Conduct (Version 2026). It sets the direction for identifying, preventing, stopping or minimising negative impacts on human rights and the environment through partnership-based cooperation.

“Supply chain participants” are economic entities, including their female and male employees. They supply us or our global direct DEICHMANN contract partners, directly or indirectly, with goods and/or services that are used in or for the manufacture of the goods and/or the provision of the services and that are essential for these.

This DEICHMANN Code of Conduct follows the current principles of the amfori Business Social Compliance Initiative (BSCI) and is based on international agreements such as the United Nations (UN) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the gender dimensions of the UN Guiding Principles on Business and Human Rights (UNGPs), the sector-specific OECD guidelines and the OECD Guidelines for Multinational Enterprises, the UN Children’s Rights and Business Principles, as well as the core labour standards, conventions and recommendations of the International Labour Organization (ILO), which are crucial to improving working conditions in supply chains.

With this DEICHMANN Code of Conduct, we intend to implement and further develop our principles in cooperation with the participants in our supply chains. In the event of non-fulfilment, business relationships are not simply ended; instead, improvements are worked on together.

When ending business relationships, we will, where possible, ensure that this is done in a socially responsible manner by considering the interests of all parties involved and creating fair transition measures. Our aim is to minimise long-term negative impacts.

Our basic rule for cooperation is that all supply chain participants must follow the principles set out here in all their activities. Our shared goal is to pursue a holistic approach to implementing due diligence obligations: negative impacts relating to human rights and the environment are to be identified, prevented, mitigated and remedied. If any of our principles fall below the national law of a country or territory, then national laws and therefore the higher standard always apply. In such a case, the supply chain participants must inform the DEICHMANN Group immediately. Existing rules or provisions with higher standards that go beyond local laws are not overridden and must be complied with.

Heinrich O. Deichmann, Chairman of the Administrative Board and the Managing Directors



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1. Participation and protection of employees

Supply chain participants must establish human-rights-related and environment-related responsible management practices in order to involve employees and their representatives in the exchange of well-founded information on human rights and environmental due diligence obligations as well as local legal requirements. This also includes gender-specific due diligence obligations. These processes include, among other things, the systematic examination and assessment of risks, in particular regarding human rights, environmental standards and legal requirements. They must define long-term objectives and enable suitable measures to protect employees in line with the objectives of the DEICHMANN Code of Conduct, as well as take concrete steps to inform employees (especially vulnerable persons) about their rights and obligations.

In addition, supply chain participants are obliged to build sufficient competence among managers, employees and worker representatives in order to embed these measures successfully in the business. Continuous education and training at all levels of activity is essential.

At operational level, supply chain participants must establish, or participate in, effective grievance mechanisms for individuals and communities who may be affected by negative impacts and keep accurate records. The grievance mechanism must be implemented in accordance with Article 31 of the UNGP. At operational level, it should be accessible in the respective national languages and enable issues to be resolved effectively through partnerships and coordination among all parties involved. Even where legal systems are effective and well resourced, grievance mechanisms can offer particular advantages, such as rapid access to a trusted person and the swift elimination of potential shortcomings.

2. Child labour and protection of young employees

Child labour is any work carried out by a person under 15 years of age, unless the exceptions recognised by the ILO apply or local legislation provides for a higher minimum age or a longer period of compulsory schooling. In this case, the higher age is decisive.

“Young workers” refers to employees who are older than a child as defined above and younger than 18 years of age.

Supply chain participants must not directly or indirectly use child labour as defined above, nor tolerate it. They undertake to establish reliable methods for determining age as part of recruitment procedures, which must under no circumstances lead to degrading or undignified treatment of those involved.

If children were victims of child labour as defined above and have been released from it, supply chain participants are responsible. They must ensure the safety, health, education and development of these children. The procedures must be documented and made available to all interested parties. Children and young workers must be protected against any form of exploitation.

Supply chain participants must enable such children, through appropriate support, to attend school for as long as they are still children in the sense stated above.



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Methods and procedures must be introduced, documented, complied with and communicated to all interested parties. These measures should promote the education of children who fall under ILO Recommendation 146, are subject to compulsory schooling or attend school. This includes measures that ensure that no children or young people are employed during school hours and that the total time spent each day on transport (journeys to and from work and school), schooling and work does not exceed ten hours.

Supply chain participants ensure that young workers do not perform night work and are also protected outside the workplace from conditions that endanger their health, safety, morals and psychological and physical development. Companies grant young employees access to effective grievance mechanisms, school systems and programmes on occupational health and safety.

If it is found that work endangers young employees under 18 years of age, they must be transferred immediately, without loss of income, from the source of danger to a suitable work area or an alternative workplace.

3. Forced labour

Forced labour is any work or service that is demanded from a person under threat of a penalty and for which that person has not made themselves available voluntarily.

Supply chain participants must not make use of, or tolerate, any forced or compulsory labour, including state-imposed forced labour, debt bondage, serfdom, human trafficking or prison labour. Supply chain participants risk allegations of complicity if they benefit from this form of labour through their business partners in the supply chain.

Employees must not be required by employers, when they are hired, to provide a deposit or to hand over personal documents. It is expected that international principles of responsible human resources policy will be followed and that this requirement will be passed on to recruitment partners. Employment contracts must be made available clearly and transparently. Employees must not be charged recruitment fees or operating costs through the contract. They have the right to leave their workplace at any time without hindrance and to terminate an employment relationship with the employer, subject to an appropriate notice period.

In addition, employees must be ensured access, in employment-law matters, to free dispute resolution, effective remedies and comprehensive, freely accessible information.

If it is found that the principles have not been complied with and employees have suffered demonstrable harm as a result, this must be remedied step by step within a reasonable timeframe and in accordance with applicable international principles.



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4. Disciplinary measures

Supply chain participants ensure that employees are not exposed to inhumane or degrading treatment, sexual coercion, physical punishment, psychological or physical coercion and/or verbal abuse.

Necessary disciplinary measures must always be set down in writing and must also be explained orally to employees in clear, understandable words. Disciplinary measures must comply with national laws.

5. Discrimination

Supply chain participants treat employees with dignity and respect. In particular, persons must not be discriminated against or excluded in recruitment, training, promotion, remuneration, termination or retirement. This includes ethnicity, nationality, descent, age, gender, social background, religious affiliation, physical or mental disability, membership of worker organisations or trade unions, political affiliation or expression of opinion, sexual orientation, marital status, family responsibilities, pregnancy, illnesses or other conditions that could lead to discrimination.

Supply chain participants will not prevent employees from exercising their rights. Employees may follow beliefs or practices, or meet needs, that relate to race, social class, national origin, religion, disability, gender, sexual orientation, membership of associations or political affiliation.

Supply chain participants must not allow behaviour, including gestures, verbal expressions or physical contact, that implies verbal, physical, sexual, psychological or economic abuse, mental or physical coercion, physical sanctioning or other forms of harassment or intimidation.

Female employees must be granted at least the statutory maternity protection before and after the birth. They must not be dismissed due to pregnancy and must not be deployed in workplaces that endanger their health.

6. Precarious employment

Supply chain participants ensure that their recruitment processes and employment relationships do not lead to insecurity or social or economic jeopardy for employees. They ensure that all activities are carried out based on lawful and documented employment relationships. These must be established in accordance with national legislation, customs or practices and international labour standards, depending on which provides more comprehensive protection.

Before entering an employment relationship, supply chain participants must provide employees, in a language they can understand, with information about their rights, obligations and working conditions, including working hours, remuneration, holiday entitlement, protection against dismissal, maternity protection and payment provisions. Supply chain participants must provide decent working conditions, regardless of the gender of employees. In particular, within what is possible, flexible working conditions should support employees in fulfilling their role as parents or carers. Particular attention must be paid to migrant and seasonal workers whose children may have been left behind in the migrants' hometowns.



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Supply chain participants may use employment relationships only in a way that consciously corresponds to the actual purpose of the law. This excludes, but is not limited to, (a) training programmes that do not aim to impart qualifications or regular employment, (b) seasonal or casual work when it is used to undermine employee protection, and (c) substitute contracts that disadvantage the signatories, as well as (d) contracts that are used to exploit temporary agency workers and restrict workers' rights. Furthermore, the use of subcontracting arrangements must not serve to undermine employees' rights.

7. Adequate remuneration

Supply chain participants must ensure that wages and salaries paid for a standard working week at least meet statutory requirements or, if higher, the industry standards approved through collective bargaining, and that legally granted social benefits are observed.

Wages and salaries should be sufficient to meet employees' basic needs, enable a decent life, including for their families, and ensure a certain amount of disposable income. When determining possible deviations in the relevant regions, these are assessed and progress

is made step by step towards paying a living wage that enables an adequate standard of living for workers and their families.

Supply chain participants ensure that the exact composition of wages, salaries and benefits is regularly made clear to employees in detail. Deductions are permitted only under conditions prescribed by law or set out in collective agreements. Disciplinary deductions are not permitted. The level of remuneration must reflect employees' qualifications and educational level regardless of gender and relates to regular standard working hours.

Supply chain participants ensure that wages, salaries and benefits are paid on time, regularly and in full compliance with all applicable laws and that remuneration is paid in legal tender and in a manner that is favourable for employees. Partial payment in kind is permitted in accordance with ILO requirements.

Supply chain participants ensure that there is no labour brokering and no sham training relationships that serve to circumvent their obligations towards employees under applicable labour and social security legislation and corresponding provisions.



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8. Reasonable working hours

Supply chain participants must comply with applicable laws and industry standards regarding working hours. Under no circumstances may employees be required to work regularly more than 48 hours per week. At least one day off must be granted per working week and the right to daily rest breaks must be observed. However, the DEICHMANN Group recognises the exceptions defined by the ILO. Applicable national legislation, comparable industry standards or collective agreements are to be interpreted within the international frameworks defined by the ILO.

In the exceptional cases defined by the ILO, the upper limit for the above number of working hours may be exceeded; in this case, overtime is permitted on a voluntary basis. If overtime (more than the weekly regular working time) is agreed with employees of the supply chain participants, it must be ensured that it is always remunerated at a premium rate of at least 125 per cent of the normal hourly wage. Overtime should be an exception and must always be voluntary for the employee.

9. Freedom of association and collective bargaining

Supply chain participants respect the right of all employees, in a free and democratic manner, to choose, form and join worker associations of their choice, without any distinction and regardless of gender, and to engage in collective bargaining.

In situations where the right to freedom of association and collective bargaining is legally restricted, supply chain participants must enable these employees to

have comparable ways of forming self-determined and independent associations in order to be able to enter into dialogue with the employer on workplace issues.

Supply chain participants do not discriminate against employees based on trade union membership and do not prevent their representatives from gaining access to people in the workplace or interacting with them.

10. Health and safety

On the basis that supply chain participants know the industry and possible specific risks best, they must ensure a safe, clean and healthy living and working environment. They must establish relevant committees that are responsible for the health and safety of the entire workforce and for meeting the health and safety aspects of this policy. Health and safety incidents in the workplace or in other facilities provided must be documented.

Supply chain participants must comply with national legislation for the protection of health and safety in the workplace, or international standards if national legislation is weak or inadequately enforced.

Supply chain participants must take appropriate measures to prevent workplace accidents or health damage that occur during work, arise from it or are related to it. They are obliged to reduce risks in the working environment as far as possible. Vulnerable individuals such as, but not limited to, young employees, young mothers and pregnant women, as well as people with disabilities, should receive special protection.



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Active cooperation between management and employees or their representatives is essential in order to implement systems for a safe and healthy working environment. This can be achieved, among other things, by establishing occupational health and safety committees. Companies ensure that systems are in place to identify, assess, prevent and address potential hazards to the health and safety of internal stakeholders, including hazards posed by external parties. They take effective measures to prevent potential accidents, injuries and illnesses among employees that are related to, or occur during, the work process. These measures should mitigate the hazards associated with the working environment. Supply chain participants must ensure that employees receive compliant and documented health and safety training and that this training is repeated for all new and re-employed staff.

Supply chain participants will make efforts to improve worker protection in the event of accidents, including through compulsory insurance schemes. In accordance with national law, they obtain all necessary permits and documentation and take appropriate measures within their sphere of influence to ensure the stability and safety of the facilities and buildings they use and to safeguard them against any foreseeable emergencies. This includes accommodation for employees if housing is provided by the employer.

Supply chain participants respect employees' right to leave the premises without having to ask the company for permission in order to escape immediate danger.

Supply chain participants ensure that all employees have equal access to suitable occupational health care and the associated facilities and insurance.

Supply chain participants ensure access to clean drinking water, safe and clean areas for preparing and storing food, and likewise safe and clean dining and rest areas. Furthermore, they provide all employees, at all times and free of charge, with effective personal protective equipment (PPE). Personal protective equipment should consider the needs of different categories of workers, for example breastfeeding or pregnant women, and should meet the requirements of the workplace.

Supply chain participants must ensure that sleeping accommodation, if provided to employees, as well as toilets and washing facilities, are clean and safe and meet basic needs.

11. Environmental protection

Supply chain participants must review business operations for environmental impacts and establish effective policies and procedures that reflect their responsibility for the environment and ensure that natural resources are used as efficiently as possible. This must be in line with the nationally applicable laws and regulations on environmental protection in the country in which they operate.



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Supply chain participants ensure the implementation of appropriate measures to reduce adverse impacts on the community, natural resources and the environment as a whole. Hazardous substances should be avoided wherever possible or used only to a limited extent. They may be used only when handled properly and their use must not cause harm to the environment.

Environmentally sound disposal of waste, packaging, and chemical, hazardous goods and storage containers must be guaranteed and proven on request. All waste generated during production must be disposed of in accordance with national legal requirements. If there is a negative impact on the environment, it must be minimised or remedied.

12. Ethical business conduct

Supply chain participants undertake not to engage in corruption, extortion or embezzlement, nor in any form of bribery, including, but not limited to, promising, offering, accepting or granting an improper financial or other incentive.

It is expected that they have accurate information about their activities, structure and performance and disclose it in accordance with applicable regulations and comparable industry practices.

Supply chain participants must not engage in falsification of information or any act of deception. In addition, they must collect, use and protect personal data (including the data of employees, business partners, customers and consumers within their sphere of influence) with appropriate care. The collection, use and protection of personal data must be carried out in accordance with laws and legal requirements relating to data protection and information security.

In order to strengthen awareness of the policies, programmes and measures against unethical behaviour, training and communication measures must be implemented.

13. Management systems

Supply chain participants must take clear measures to meet the requirements of this Code of Conduct, integrate them into all operational processes and make them an integral part of their corporate philosophy and policy. A process-based and risk-based due diligence system must be implemented in their business practices, in line with the expectations of the DEICHMANN Code of Conduct.

Supply chain participants must actively communicate the contents of the DEICHMANN Code of Conduct to all areas within the company, business partners and relevant stakeholders.

Supply chain participants must assign a manager responsibility for all matters relating to the DEICHMANN Code of Conduct within their organisation.

The management of supply chain participants must regularly review the implementation of the requirements of the DEICHMANN Code of Conduct and strive for continuous improvement in implementation.

Supply chain participants assume responsibility for compliance with the requirements of the DEICHMANN Code of Conduct in relation to all employees whom they supervise and agree

- to assign someone responsibility for implementing the contents of the DEICHMANN Code of Conduct at every site they own or operate and use for DEICHMANN production;



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- to ensure that all employees are familiar with the contents of the DEICHMANN Code of Conduct by communicating them in a language understandable to employees and by conducting training on the DEICHMANN Code of Conduct regularly;
- to implement responsible purchasing practices and train all employees accordingly;
- to include all employees in their supply chain, especially vulnerable groups such as homeworkers, temporary workers and migrant workers, in the due diligence process in order to identify challenges at this level and strive for improvements;
- to refrain from disciplinary measures, dismissals or other discrimination against those employees who provide information about non-compliance with the requirements of the DEICHMANN Code of Conduct;
- to establish, or participate in, effective grievance mechanisms at operational level for individuals and communities that may be adversely affected and to keep accurate records.

Supply chain participants must demonstrate, through appropriate records, that they comply with the requirements of the DEICHMANN Code of Conduct. They must be able to grant the parties appointed by the DEICHMANN Group, who wish to verify compliance with the requirements, access to the records and provide appropriate information.

Supply chain participants must make compliance with the contents of the DEICHMANN Code of Conduct a condition included in all agreements they enter into. These agreements require compliance with all requirements of the DEICHMANN Code of Conduct and participation in monitoring activities on request.

14. Audit and monitoring

In order to assess compliance with the DEICHMANN Code of Conduct, the DEICHMANN Group also uses independent auditors who carry out social and environmental audits on its behalf. Depending on the role in the supply chains, different implementation conditions apply to the participants.

We, the DEICHMANN Group, have the right to monitor compliance with the contents of this Code of Conduct through systematic, unannounced inspections. The inspections are carried out by members of the DEICHMANN Group or independent auditors in accordance with the guidelines of the amfori Business Social Compliance Initiative (BSCI) or this Code of Conduct. For this purpose, it is necessary to obtain unrestricted access to facilities and personal data about employees of the supply chain participants. The participating supply chain companies enable DEICHMANN personnel and personnel commissioned by DEICHMANN to conduct interviews with employees on site and outside the company, as long as the data is treated confidentially and processed without influence.



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15. Corrective measures and non-fulfilment

The DEICHMANN Code of Conduct sets out the principles whose compliance we expect from ourselves and the supply chain participants. Implementation after acceptance of the contents of the Code of Conduct applies for the entire duration of the business relationship, including when it is ended.

We are aware that implementing these expectations in some cases requires a phased approach. For the DEICHMANN Group, it is important that, in the event of non-fulfilment, supply chain participants initiate all necessary corrective steps to improve the situation and meet these principles within a reasonable period of time. This period depends on the nature of the corrective measure and the degree of risk and must be coordinated with the DEICHMANN Group.

If there are repeated violations without the supply chain participants taking appropriate corrective steps, we are obliged to end the cooperation.

