



MODERN SLAVERY STATEMENT 2024

May 2025

PURPOSE AND CONTEXT

This Statement is issued pursuant to applicable laws concerning modern slavery, including but not limited to the California's Transparency in Supply Chains Act (2010), the UK Modern Slavery Act (2015), the Australian Modern Slavery Act (2018), and the Canadian Forced and Child Labour Act (2024). It presents the actions taken by Decathlon SE and its subsidiaries (Decathlon) to tackle modern slavery risks in its global operations and supply chain, for the **financial year starting January 1, 2024 and ending December 31, 2024**.

The elements displayed in this document are to be considered as a **part of Decathlon's global risk management initiative**. Indeed, the company's general due diligence framework is **set out in its annual Vigilance Plan**, issued pursuant to a growing set of corporate sustainability due diligence regulations, i.a.: the French Corporate Duty of Vigilance Law (2017), the Dutch Human rights and Environmental Due Diligence Law (2019), the German Supply Chain Diligence Act (2023), and the EU Corporate Sustainability Due Diligence Directive (as soon as applicable).

The efforts and means put in place to assess and address modern slavery risks are to be read in this broader understanding, considering the efforts and means deployed by Decathlon targeting all risks existing in its supply chain. Indeed, **Decathlon has a strong commitment to uphold corporate sustainability standards**, in order to prevent and remedy negative impacts of its activities and those of its business partners on human rights and the environment.

Among those matters, modern slavery is a major stake. Decathlon strives to tackle connected risks in the most efficient way, with the means and resources existent and accessible, as set out in this statement.

Decathlon recognises all forms of modern slavery including forced labour, prison labour, indentured labour, bonded labour, human trafficking, or other similar conduct. The company also has a strong commitment to prohibit the use of child labour in its value chain, which can often lead to situations of slavery too. The term modern slavery will be used in this document as encompassing child labour stakes as well.

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1. BUSINESS & VALUE CHAIN

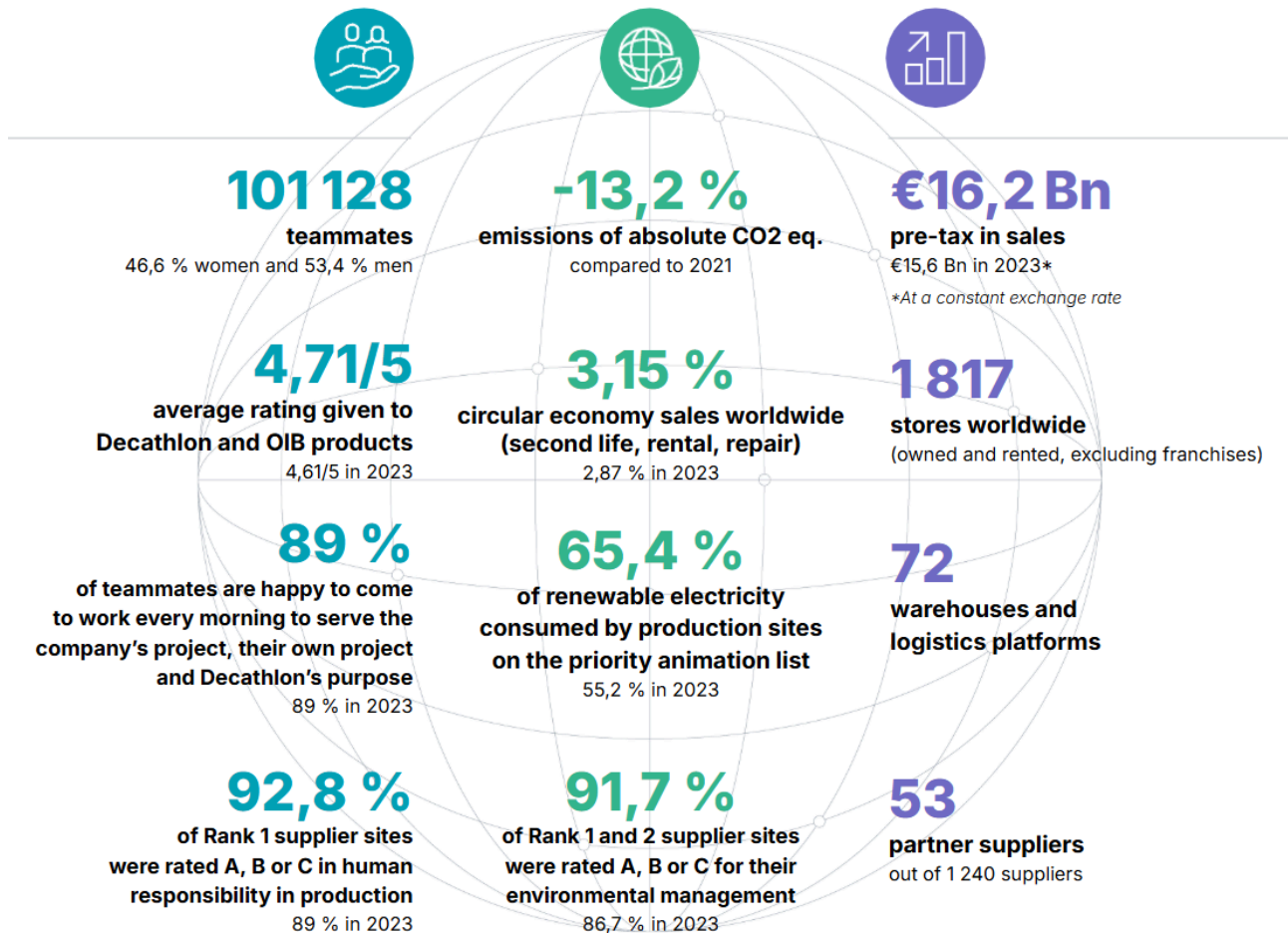
1.1. Business structure and operations

Decathlon is one of the world's largest sporting goods' brands and retailers. It is a French company founded in 1976 specialised in the design and distribution of sports goods, working to provide quality products accessible and adapted to the needs of all, from enthusiastic beginners to passionate professionals. Decathlon operates around:

- **4 values:** Vitality, Responsibility, Generosity, Authenticity
- **5 pillars** of the company's North Star:
 - End-to-end customer experience
 - Beacon of light for a sustainable future
 - State-of-the-art omni value chain
 - Excellence and style in key sports
 - People-centered modern company

Thanks to its 101,128 teammates, Decathlon developed worldwide and now has 1,817 stores around the globe. The company's headquarters are in Villeneuve-d'Ascq, France. Decathlon's own operations and those of its commercial partners touch upon the following sectors: research and innovation ; design ; raw materials extraction / cultivation ; industrial operations ; transport in its various forms ; information systems, digital applications & equipment ; distribution (physical and digital) ; communication.

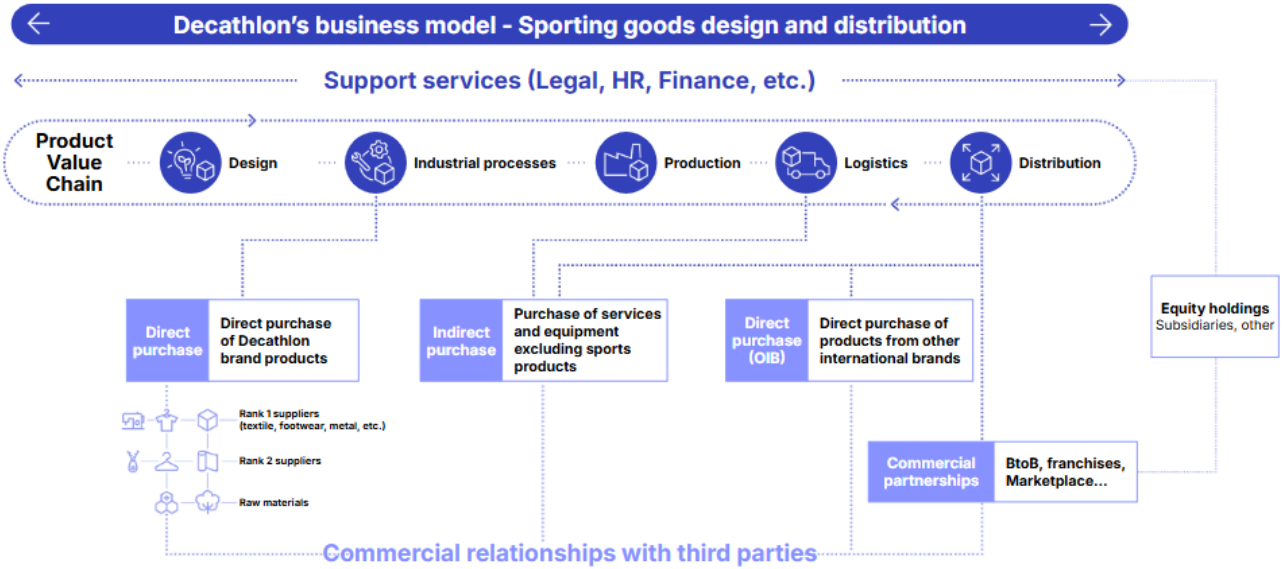
Decathlon in numbers



* **Partners:** These are the suppliers with which Decathlon builds a long-term industrial project and a common vision based on sharing meaning and values, transparency and collaboration, and with which it establishes a relationship of trust.

1.2. Due diligence scope

In line with its core values of Vitality, Generosity, Responsibility and Authenticity, Decathlon has always sought to grow while considering its **impacts on people and the planet**. In doing so, sustainability due diligence has become a crucial pillar of the company's activities, based particularly on the [UN Guiding principles](#) on business and human rights, and the [OCDE Guidelines](#) for multinational enterprises on responsible business conduct. In an approach of continuous improvement, the company strives to apply these principles **in its activities and in the conduct of these with its partners, across its value chain**.



Rank 1 manufacturing suppliers are bound contractually to a Decathlon group company for the manufacture or assembly of finished and semi-finished products* (manufacturing contract), or for the supply of raw materials or components (purchasing contract). They receive purchase orders from that group company and invoice it directly.

Rank 2 manufacturing suppliers contribute to the Decathlon value chain. They have a direct business relationship with Rank 1 suppliers, with which they manage purchase orders and invoicing. Decathlon reserves the right to intervene in the choice or approval of these Rank 2 suppliers for their distinctive component offer, without however interfering in the commercial and legal relationship between Rank 1 and Rank 2 suppliers.

Other business partners are suppliers or commercial partners for goods and/or services with which Decathlon has a direct or indirect commercial relationship.

**Decathlon's own brand products*

2. RISK MAPPING

2.1. General vigilance risk mapping

A risk mapping is performed annually by the global Sustainability & human rights due diligence (SHDD) team along with a variety of other actors, to highlight areas of focus. Included in this analysis are the **social and environmental risks of both Decathlon's own operations and those of its commercial partners**. The 2024 mapping identified the following risks in the supply chain:

| Sectors > | Agricultural products | Metals and mining | Industry | Road transportation | Marine transportation | Engineering and construction services | Hardware | Software and IT services | Commercial banks | Professional and commercial services | Own shops (Retail) | Advertising and marketing | Franchisees | E-commerce |
|---------------------------|-----------------------|-------------------|----------|---------------------|-----------------------|---------------------------------------|----------|--------------------------|------------------|--------------------------------------|--------------------|---------------------------|-------------|------------|
| Human rights risks | | | | | | | | | | | | | | |
| Child Labour | ● | ● | ● | ● | ● | ● | ● | | | ● | ● | | ● | ● |
| Decent wages | ● | ● | ● | ● | ● | ● | ● | ● | ● | ● | ● | | ● | ● |
| Decent working time | ● | ● | ● | ● | ● | ● | ● | ● | ● | ● | ● | | ● | ● |
| Forced labor | ● | ● | ● | ● | ● | ● | ● | | ● | ● | ● | | ● | ● |

Risk level: ● Moderate risk ● Significant risk ● Major risk

Through its partnership with [Verisk Maplecroft](#)¹, Decathlon introduced, in 2021, sectoral and geographical risk data on **15 environmental and social topics** (based on the IFRS-ISSB/SASB sectoral classification). Verisk Maplecroft assesses these topics using *inter alia*: corporate reports in the sectors ; media/ civil society reports of incidents, sanctions and violations ; political and judicial organisation and level of corruption in the countries ; etc.

In order to identify risks to prioritise, the analysis takes into account the three following parameters :

- **sector data:** sectors defined by the Verisk Maplecroft tool follow the ISSB/SASB sectoral classification
- **activity data:** company-specific data with 3 criteria (purchase volume, sales, number of teammates)
- **country data:** all of Decathlon's countries of production and distribution, since 2023

The company previously considered only countries representing 80% of distribution activities and countries representing 80% of volumes in industrial purchases.

In addition, in 2024, the risks associated with franchise partners based on their country of location were included in the mapping.

For the next financial year, we plan to integrate the countries and activities linked to Decathlon's wholesale market (BtoB distribution network).

The **analysis performed regards gross risks**, i.e. considered before taking into account risk management measures (net risks), and produces a scale of risks: low, moderate, significant and major, as indicated in the map above. Low risks are not indicated as they are monitored but considered in risk management systems.

The "forced labour" risk taken into account in Decathlon's risk mapping was based on the average of the "Modern slavery" and "Migrant workers" indexes from Verisk analysis. The "Modern Slavery" Index is defined by Verisk as the risk to business of the possible association with or exposure to practices of slavery, servitude, trafficking in persons and forced labour by state and non-state actors within the supply chain. The choice to also include the "Migrant workers" index was made considering the **substantive higher risk of forced labour faced by the migrant population**, who often struggles to uphold their rights: indeed, the forced labour prevalence of adult migrant workers is more than three times higher than that of adult non-migrant workers. This vulnerability to forced labour and trafficking for forced labour derives from several factors including: migration often being irregular or poorly governed, and the existence of unfair / unethical recruitment practices².

2.2. Focus on migrant worker welfare

In line with the elements presented just above, **Decathlon chose to prioritise the topic of migrant worker welfare within its manufacturing supply chain**, when addressing modern slavery risks. With the general vigilance risk mapping as its base, the company's current focus includes rank 1 and potential rank 2 manufacturing suppliers, where migrant workers constitute minimum 20% of the workforce. Following the scoping of sites, targeted action plans are developed to support suppliers in building capacity and deepening their understanding of the specific risks faced by migrant workers and the potential impacts. These initiatives aim to foster long-term improvements in their working conditions.

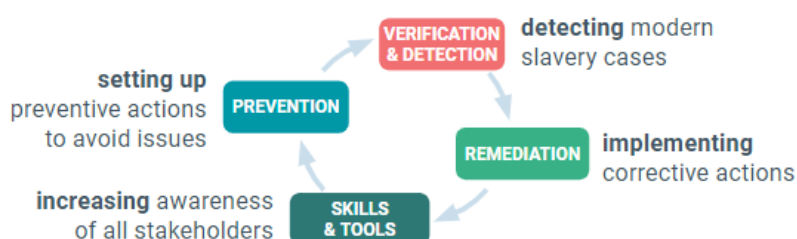
In addition to this chosen focus, Decathlon's teams are working on a specific methodology, integrating the gross risk score (from the general risk mapping), mitigation actions, and a broad range of social and operational factors. This enables to obtain a **net risk score, allowing for tailored mitigation measures** depending on the supplier or the country concerned. The tool supporting this framework will be launched in 2025.

3. RISK MANAGEMENT

Decathlon strives to ensure that human rights are respected and promoted within its activities and in its relations with its business partners. This includes efforts to tackle modern slavery and child labour ; Decathlon continuously improves its management of these issues *inter alia* for suppliers in production since 2002, notably with:

- **binding and guiding documents** to agree and/or advise on ethical standards
- **purchasing policies** taking into account a risk management approach
- **social assessment grid** to ensure compliance with agreed standards, and proper risk control in factories
- **teammates dedicated** to work on these issues, with an expert and/or local perspective
- **trainings** for responsible teams and other targets to increase awareness

All these tools, processes and frameworks aim at:



3.1. Binding and Guiding Documents

Codes of Conduct

The codes **cover the major human rights matters at work**, including elements on forced labour, child labour, discrimination, physical/ mental health & safety, freedom of association and decent wages (it also includes elements on environmental risks). The documents **aim at making Decathlon's minimum standards clear and known to its suppliers and business partners**, to ensure their respect on the production sites, and to enable compliance assessments. In order to adapt the tool at best to different contexts and needs, Decathlon developed two codes³, depending on the type of partners:

[Code for manufacturing suppliers](#)

Very detailed on the elements listed above, this Code is incorporated in the purchasing agreement which identifies and lists the production sites used to manufacture Decathlon products. Suppliers are required to enforce the requirements of this Code or equivalent standards with their own suppliers.

[Code for all other business partners](#)

More succinct, as it is covering many different sectors (less risky regarding modern slavery matters).

Employment at Decathlon manufacturing suppliers must be voluntary, and workers must be free to leave the workplace after completing their standard working hours, or to leave the company respecting legal and reasonable notice. Contracted labour cannot be abused and any practice to facilitate or contribute to forced labour is prohibited.

Beside these two documents aimed at engaging Decathlon's external partners, a **Code of Conduct for Decathlon's employees** was deployed in 2024. It aims at setting out a set of ethical rules and commitments to be followed by each teammate in every aspect of their day-to-day operations, internally and externally.

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- **NEXT:** Continue to work to include the Code of Conduct in all new contracts as a rule, and revise existing ones
 - **NEXT:** Update both codes of conduct in 2025, in collaboration with relevant internal teams

Human Rights Policy

Decathlon formalised in 2023 its [Human rights policy](#)³, thanks to the collaboration of many company stakeholders. It has been approved by the company's Executive Committee, **publicly marking Decathlon's commitment** to these crucial topics towards both internal and external stakeholders.

The document:

- Upholds Decathlon's commitment to respect internationally **recognised human rights standards**, and sheds light on the company's strategy to promote their application in the way it conducts its activities ;
- Clarifies Decathlon's position on a range of topics: child labour; discrimination; diversity, equity and inclusion; fair wages and remuneration; freedom of association and collective bargaining; freedom of expression; forced labour; rights of indigenous peoples; degrading treatment/harassment; personal data protection; right to a healthy environment; working conditions; occupational health and safety ;
- Explains the reasonable efforts process on these topics.

Dormitory Guidelines

The Dormitory Guidelines³ help Decathlon's suppliers understand the **company's requirements to guarantee a decent living condition for its employees**. On this basis, dormitory facilities can be assessed through a dormitory checklist, covering the following key points: living conditions & safety of workers, legal authorisations, freedom of movement, grievance mechanism and medical facilities.

All internal and external social assessments carried out during 2024 included the evaluation of workers' dormitories, wherever applicable. Recognising living conditions as an integral part of worker welfare, Decathlon applies the same rigorous standards and methodology used in its factory assessments to dormitory inspections.

The Guidelines were **updated in 2024 to incorporate the latest international best practices** on migrant workers' accommodations as outlined by the IOM⁴ in its [Migrant Worker Guidelines for Employers](#). This revision was conducted in consultation with external expert organisations. Decathlon's Guidelines now also reflect key requirements for the company's suppliers and other business partners to provide adequate, decent and gender-responsive living conditions for migrant workers and standards for spacing at workers' accommodations. This reflects the holistic view of working and living environments, reinforcing Decathlon's commitment to safeguard human rights and promote decent living conditions across the supply chain.

Ethical Recruitment Guidelines

The Ethical Recruitment Guidelines³ help Decathlon's suppliers to **build fair, transparent, and responsible recruitment practices**, especially in regions known as migrant corridors. These areas, where the recruitment of foreign migrant workers is most prevalent, require heightened diligence throughout the recruitment life cycle: from initial hiring to the end of employment and safe repatriation.

Firstly, partner suppliers frame their Ethical Recruitment Policy, the Guidelines then support them to:

- Identify a responsible intermediary/broker,
- Establish prerequisites to ethical sourcing of workers through intermediaries and training them,
- Establish pre-departure and post-arrival orientation programs,
- Frame right induction program when they arrive at supplier

The Guidelines were **updated in 2024 to incorporate the latest international best practices**, i.e., IOM's IRIS [Ethical Recruitment Standard](#). These practices aim at ensuring that international recruitment is fair for everyone involved, i.e. migrant workers, employers, recruiters in both countries of origin and destination. They also include the [Employer Pays Principle](#), which stipulates that the costs of recruitment should be borne by the employer, not the worker. The revision of the Guidelines was conducted in consultation with external expert organisations.

In 2024, Decathlon intensified its commitment to ethical recruitment by conducting in-depth assessments of selected recruitment intermediaries in Taiwan (cf. section 6).

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- **NEXT:** Work on the implications of the updated Guidelines deployment, and provide support for compliance
 - **NEXT:** Establish the two Guidelines as binding documents
 - **NEXT:** Develop forward-looking approaches to enhance risk management in dormitories, and regarding ethical recruitments through tools

3.2. Purchasing policies

Direct Purchases

Direct purchases concern **all sports products sold directly by Decathlon**: Decathlon's own brand products as well as those of other international sports brands.

Regarding Decathlon's own brands, products are designed by the brand teams and then manufactured under the lead of industrial teams at supplier production units in 45 countries/regions, according to 12 processes (cf. [Appendix](#)). The **categories of suppliers were restructured** in 2023, in order to support a **new industrial project** launched to improve sustainability, innovation and digitalisation. Suppliers are now classified as:

- "partner" suppliers (53 in 2023) are long-term suppliers sharing Decathlon's values, which bring added value for production capacities and/or industrial innovations
- "strategic" suppliers include suppliers having technological exclusivity or a significant production volume, but which do not meet all conditions to be considered partners
- other suppliers

Risk management is also a part of **purchasing strategies, considering four categories of risks**:

- External risks: geopolitical or economic crises, climate change, pandemics, cyber attacks, etc.
- Strategic risks: rising costs, financial risks, innovation and obsolescence, etc.
- Operational risks: capacity risks, quality, procurement, workforce availability, etc.
- Sustainable development risks: product regulations, business ethics, human rights, health & safety, etc.

On certain industrial processes, Decathlon's particularity is to have commercial relations with component **suppliers who are in rank 2 or 3** in the value chain. Over the last years, Decathlon tested a methodology on a few industrial processes to manage risks among some of its tier 2 suppliers, with or without a direct commercial relationship. Efforts are ongoing to rework the definition of rank N suppliers and develop a global approach on suppliers according to their rank in the value chain, the commercial relationship with Decathlon and sectoral risks. In order to tackle **issues linked to raw materials** (e.g. cotton, polyester, metal), Decathlon developed an approach around three axes, which should be completed by the end of 2025 : consolidate volumes of key materials in own-brand products, perform an in-depth risk mapping, identify and address priority-risk materials.

Regarding Decathlon's products from other international brands (OIB), a due diligence approach was structured in 2023, to go beyond the existing framework based on a Distribution Agreement engaging the tiers on ESG standards, and attaching Decathlon's Code of Conduct for business partners (cf. [above](#)). In 2023, a **dedicated compliance leader** was appointed (to work *inter alia* on corporate sustainability due diligence). Since 2024, Decathlon requires all its OIB suppliers, through the agreement signed between the parties, to have their CSR performance assessed by a third-party assessor - Decathlon recommends working with the [Ecovadis](#)⁵ **non-financial evaluation platform**. The assessment process includes the implementation and monitoring of action plans for the environment, human rights (including forced labour), ethics and responsible procurement.



If the partner does not have a third-party assessor, the agreement is amended and the partner is required to complete a CSR questionnaire, then analysed internally. Results of the assessment enable buyers to engage their partners on these key issues, while taking into account the leverage of Decathlon when dealing with commercial partners that can be sometimes out of reach.

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- **NEXT:** Finalise the review of the direct purchasing policy, integrating innovation and sustainability issues
 - **NEXT:** Scope expansion of the framework dealing with social and environmental matters, to include categories and suppliers further upstream in the value chain
 - **NEXT:** Continue efforts to manage risks linked to tier N suppliers and raw materials
 - **NEXT:** (OIB) Implement a digital supplier platform integrating sustainability compliance data
 - **NEXT:** (OIB) Brand review with a comprehensive evaluation of the top 50 suppliers, including CSR assessments

Indirect Purchases

Indirect purchases include all purchases and **services necessary for the company's activities** to function properly (logistics, communication, IT, real estate, etc.). Decathlon manages the major risks specific to this scope on the basis of : the indirect purchases structuring and digitisation project launched in 2020 - which identified 15 categories of indirect purchases (cf. [Appendix](#)), and the indirect purchases global strategy finalised in 2022. The risk management approach is organised around several actions, such as :

- deployment of the global indirect purchasing policy (51 out of 55 countries now have a local policy integrating their specificities) ;
- identification and management of so-called "critical" suppliers, qualified according to four criteria (risk for Decathlon, contribution to the business model, sales volume, CSR risks⁶) ;
→ 332 identified in 2024 (165 in 2023)
- non-financial assessment using the EcoVadis platform (cf. above), to determine the suppliers' ESG maturity level and decide on follow-up actions ;
→ assessment regarded 29 countries in 2024 (10 in 2023)
- upgrading buyer skills on CSR issues and through analysis of the maturity level of the indirect purchasing structure and its added value in a country.

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- **NEXT:** Assess critical suppliers via EcoVadis or existing equivalence (objective: 90% assessed)
 - **NEXT:** Manage of action plans for suppliers with D or E ranking
 - **NEXT:** Automate CSR criteria using the tender management tool
 - **NEXT:** Set up of a global extra-financial performance dashboard

3.3. Audits on suppliers' production sites (direct purchasing)

Social audit grid

As the industry is a particularly risky sector, a specific in depth process has been developed regarding direct purchases to assess the situation on Decathlon's suppliers' sites. These assessments follow a grid, the social (or Human Responsibility in Production) audit grid, established on the basis of the [SA8000 standard](#). It is structured in **risk management levels ranging from E to A**, with the aim of having 90% of supplier sites concerned having a level A, B or C by 2026 (cf diagram below). These **human rights, health & safety assessments** are conducted with suppliers before the start of their business relationship with Decathlon. After that, a review is conducted on a regular basis, depending on the countries' risk levels (cf. [Decathlon Vigilance Plan 2024](#) to see the social audits frequency map).

In 2024, 1,272 of Decathlon's suppliers' sites were evaluated (954 from rank 1 suppliers), through 842 assessments. Following Decathlon's Code of Conduct for manufacturing suppliers, Decathlon's assessment includes verification on modern slavery and child labour issues. The main audits points on these topics are :

| | Child Labour | Forced Labour |
|--------------|---|--|
| UNACCEPTABLE | <ul style="list-style-type: none"> • minimum legal working age of 15 • adequate areas and clear listing for children on sites | <ul style="list-style-type: none"> • no prison labour • no retention of official documents |
| INSUFFICIENT | <ul style="list-style-type: none"> • proof of the age of employees • no historical child labour (last 6 months) • young workers have a protected status respecting at least local regulation | <ul style="list-style-type: none"> • no recruitment agency licence • guarantee/ deposit requirement • migrant workers: fees /expenses provision clearly communicated • migrant workers: fees /commissions /expens • es provisions respecting applicable regulations • overtime is voluntary • freedom of movement during working hours • freedom of movement /social interaction during non-working hours • no implemented system that might lead employees to work against their own free will |

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- formalised procedure on to ensure the detection, prevention of child labour and the well-being of young workers
- ethical recruitment policy/procedure, legal contract established with its labour supply chain, specific requirements regarding migrant workers, etc.

Once the audit has been performed, the results classifies the supplier's site in one of 5 categories, each corresponding to a different follow-up:



→ **NEXT:** Further strengthening of forced labour detection through the integration of a new tool (the Apprise App, cf. section 4.3) into assessment standard

3.4. Responsible teammates

In order to manage the risks efficiently, **Decathlon's policies and frameworks function with key actors** within the teammates, able to identify and address the challenges from an **expert and/or local perspective**.

Production teams (local)

Locally-recruited to **manage Decathlon's manufacturing activity at the operational level**. They visit suppliers' production sites on a regular basis, working with them on issues including (1) product development, quality, production cost control, lead-times and (2) compliance issues, via the Code of Conduct for manufacturing suppliers. Production teams are in charge of **detecting critical and unacceptable situations**: when necessary, they must find immediate solutions or suspend production, and order to speed up resolution. Each team member has to follow the "Sustainable Development in Production" training, which includes (since 2018) elements to tackle modern slavery.

Operational Process Manager for Sustainable Development (local)

Local recruits, speaking the suppliers' language and understanding the country's culture. This enables them to work more effectively, and to identify local difficulties or problems. The OPM SD are **constantly training the production teams** and some are in charge of continuously improving the tools/ methods used. Following a reorganisation in 2023 with a specific emphasis on social, Decathlon now counts 42 OPM SD and 5 SD directors with this responsibility. In addition, 100 teammates (who are involved in industrial production and who received training) volunteered as Assessors (cf. section 3.3).

Zone Referent on Forced Labour (local)

New role from 2024, **in all Decathlon zones** (see above), so that all actions to prevent modern slavery can be locally managed and adapted to each context. As the topic requires cultural sensitivity and knowledge, the referents are already competent social assessors, who will partially dedicate their mission on this topic by:

- empowering local teams
- deploying tools
- initiating third-parties collaborations (e.g. with industry working groups, NGOs, etc.)

Social Responsibility & Impact team (central)

The team is committed to respecting and promoting human rights across the operations and supply chain, focusing on protecting the rights of those most impacted by our activities. This means **identifying risks, taking proactive action, and providing remedies** whenever the operations are linked to negative impacts on people. Their scope includes *inter alia* action on living wage and forced labour.

Industrial Strategic Buyers (central)

These buyers (close to 200 since 2022) are **trained by Decathlon to develop sustainable development and leadership skills**. At Decathlon, buyers build their international purchasing policy according to their industrial process but always including the company's social responsibility policies and considering the respect for human rights and prevention of modern slavery.

To do so, they are trained during their induction period on those fundamentals subjects, and regularly manage their suppliers during quarterly reviews of their suppliers panel.

Global Sustainability & Human rights Due Diligence team (central)

The SHDD team (4.5 persons) leads the **reasonable coverage of human rights and environmental risks** in the company's operations, including modern slavery and child labour risks within its supply chain.

Main missions include :

- establishing a yearly risk mapping to identify the main negative impacts on people and the planet ;
- co-constructing vigilance programmes adapted to company's activities (purchase, health & safety, etc.) ;
- writing of Vigilance Plan and of Modern Slavery Statement, with inputs from relevant teammates ;
- assessing the programme's efficiency and compliance with existing legal frameworks, and anticipating new regulations ;
- reporting to the Audit and Compliance Committee on the vigilance programme.
- managing the network of local referents on these issues, in each country where Decathlon operates

3.5. Trainings

E-learning

Decathlon partnered with Mekong Club⁷ to **enhance its e-learning on forced labour with four key modules**, accessible since 2024 through their platform **to internal teammates**.

The training program first builds the participants' understanding of modern slavery in its different forms, underlying the main causes and global impact. It then covers key areas such as the challenges involved in migrant labour recruitment, important anti-slavery laws and compliance measures. It highlights the need for transparency in supply chains, with a focus on responsible sourcing and corporate accountability.

Decathlon is currently centralising all training modules on its internal platform. Internal circumstances delayed the implementation of the latter, which hindered the promotion and deployment of the e-learning in the past year.

Beside this targeted e-learning on forced labour issues, Decathlon developed a **more general e-learning on human rights** in 2022. This short training, aimed at all teammates, was designed to increase their awareness of basic fundamental rights in the work sphere. Modern slavery is the first of the 9 topics addressed.

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- **NEXT:** Commission the forced labour e-learning modules in the company's internal platform
 - **NEXT:** Deploy the e-learning with scoped target audience

Webinar on "ILO* indicators"

**International Labour Organisation⁸*

In 2022, Decathlon enhanced its training offer by launching a **dedicated webinar on "ILO Indicators of Forced Labour," tailored for key stakeholders in its production countries**. The session combines a clear overview of the context and importance of the topic, with practical examples of modern slavery in the world. Each ILO indicator is illustrated through relatable case studies, helping participants draw meaningful connections to their roles within supplier factories. The webinar equips teams with the knowledge to recognise and respond to potential risks in the manufacturing sector more effectively.

One session took place in 2024 for representatives from 8 different countries. By bringing together the internal team and supplier management for a focused discussion, it successfully deepened the crucial implications of ILO Indicators for rightsholders. The representatives can subsequently forward the understandings and impacts of the webinar on a broader population, through their local/ sectoral actions.

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- **NEXT:** Continue to raise awareness among the suppliers, by empowering designated zone referents in each region to conduct training sessions in the local language and accommodate cultural sensitivities
 - **NEXT:** Refresh the training offer to reflect current challenges /industry standards, increase practical relevance
 - **NEXT:** Use the country referents' network to deliver webinars and facilitate training for internal teams and suppliers at local level

Focus assessment & Capacity building for internal assessors

Decathlon strategically focuses on **empowering its assessment teams**, in order to enhance their ability to identify and address critical forced labour risks. Following its assessment in 2023, the company developed and now implements a corrective action plan **with the support of expert partners** on these topics. The collaboration ensures standardised remediation, and strengthens governance for lasting impact.

Decathlon also established a network of specialised external organisations across its operational zones, in order to provide support for all stages of assessment and remediation. The company's local referents serve as points of contact and coordination in each region, ensuring efficient implementation and follow-through. Starting from 2025, when Decathlon's workers feedback systems (cf. section below on reporting mechanisms) flag a significant risk based on predefined severity, a focused assessment will be promptly initiated. This ensures that workers' alerts directly informs targeted action through the governance framework.

Focus assessment on ethical recruitment

In 2024, Decathlon conducted in-depth assessments of selected recruitment intermediaries in Taiwan, with the support of expert external organisations. These evaluations focused not only on the intermediaries operating in Taiwan, but also extended to their connections with partners in workers' countries of origin. The assessment explored the entire recruitment journey, examining how workers are identified and sourced, the coordination and logistics of their movement from their home countries to Taiwan, the transparency and fairness of recruitment costs, as well as the working and living conditions provided to them upon arrival.

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- **NEXT:** Continue the identification of risk while empowering Decathlon's referents to detect and remediate when necessary

4. REPORTING MECHANISMS

4.1. Whistleblowing system

Presentation

As part of a process of continuous improvement and a desire to listen, Decathlon set up an **alert system for human and environmental breaches**, for Decathlon's own operations and those of its suppliers, subcontractors and service providers. These alerts **can be reported by various stakeholders** in the business ecosystem or by company stakeholders: teammates, customers and users, NGOs, communities and residents, civil society, experts, media and social media, shareholders and funders, etc. They can include studies, publications, contacts, or reports via the alert platform.

In 2019, Decathlon established an independent, multilingual alert tool to:

- guarantee **confidentiality** and protection of whistleblowers
- offer **technical independence** from the company's IT systems
- obtain a global view
- improve processes and capitalise on good remediation practices
- manage alerts from start to finish
- comply with ethics regulations (corruption, human rights, etc.)

To ensure coherence and optimise means, the SHDD team works closely with the Business Ethics team to develop a **shared platform to receive reports on reasonable vigilance, corruption** and business ethics more generally. The alert tool has been **deployed in all countries and regions** in the local language(s).

Teammates can access "Whispli" platform internally via the intranet. Customers, suppliers, civil society, etc. can access it externally on engagements.decathlon.fr and on the [whistle-blowing platform](#)



Internal deployment

Several communications are regularly provided for teammates, notably guiding them on how to use the tool and underlying the confidentiality and protection for whistleblowers. The goal is to **encourage teammates to use** the tool when usual channels (report to direct manager, HR, staff representatives) do not work or if employees do not feel safe and prefer a tool guaranteeing confidentiality.

Deployment is **highly dependent on local situations**: the regulatory context, relationship with the hierarchy, level of transparency and culture are all parameters that have to be taken into account with discernment.

External deployment

The tool was implemented in May 2019, and then **included in the codes of conduct** for industrial suppliers (shared in 2021) and commercial partners (since 2020). Additionally, it has been put forward on the official commercial websites of certain countries (Spain, Germany, Italy), where Decathlon is well known. The aim is to analyse how this tool is used by external stakeholders in these countries, before duplicating in others.

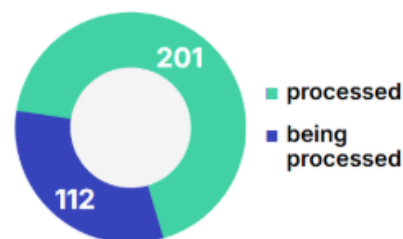
Decathlon is aware of the need to make this solution **known to the most vulnerable populations, particularly among its industrial partners and suppliers**. In 2024, the implementation of the system continued, reaching seven partners in India and Bangladesh. Decathlon aims to progressively **cover all partner suppliers sites by 2026**.

Results for 2024

In 2024, the overall number of reports increased by 24,7% due to the deployment and communication of the tool. Most important internal reports concern situations relate to **employment contracts and psychological harassment**.

This will be addressed at both individual and collective levels. Indeed, and as mentioned above, a global framework has been established regarding mental health and well-being at work.

Number of reports in 2024 (per status) as of January 2 2025.



No **external reports** were received via the tool, however Decathlon teams processed several reports from the media, NGOs and/or supervisory authorities, all regarding direct purchases: 4 reports on health & Safety (Taiwan, Pakistan, Bangladesh, India), 1 report on young worker (India), 1 report on decent working hours /minimum salary (Ethiopia), 1 report on forced labour (China), 1 report on child labour (China), 1 report on freedom of association (Bangladesh), and 1 report on deforestation (Vietnam/ China).

Thanks to the established process, each report is investigated by the internal teams concerned, and when necessary, by a third party. **If the report is well founded, action plans are required** from third parties and monitored over time by Decathlon's Purchasing and Sustainable Development teams. The company tries as much as possible to involve its partners in a positive approach to improving and respecting human rights and the environment, particularly through its audit and selection processes. Terminating the relationship remains the last resort if action plans are not put in place despite extensive and regular facilitation.

- **NEXT:** Internally, increase the teammates' familiarity and trust in the platform (through local communication will be set up by the network of compliance officers using communication kits developed by the central teams)
- **NEXT:** Internally, structure report processing and work with HR to systematically address reports' root causes
- **NEXT:** Externally, continue the implementation of the platform with industrial partners, to cover all sites by 2026

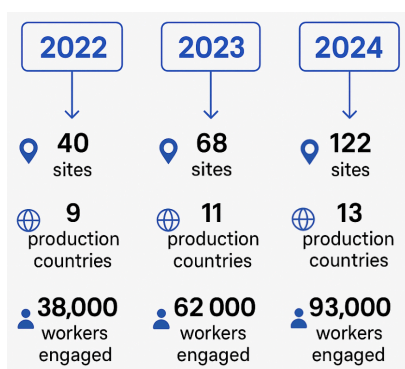
4.2. Wellbeing Survey

Engagement & Wellbeing survey (EWB)

At Decathlon, employees' engagement is essential to the continuous improvement of working conditions. That is why it was decided to deploy the EWB survey⁹, an **anonymous survey including 20 questions** on employees' engagement and wellbeing. It covers topics such as: skill development, communication, stress, compensation, health and safety, social connection, sexual harassment.

The questionnaire is based on [Nike's "Engagement and Wellbeing Survey"](#), **used by a number of companies in the textile sector**. By using this existing basis, Decathlon joined forces with other industry leaders in allowing production workers to express themselves more freely, with the assurance of confidentiality. Choosing this common tool also avoids the proliferation of mechanisms and demands towards suppliers and their employees.

The EWB survey enables Decathlon and its suppliers' teams to get a 360-degree view of worker wellbeing on site, identify risks at stake and define areas for improvement. This is crucial to shape Decathlon's future projects and strategies. After analysing the survey results with the help of external providers, **Decathlon's suppliers define action plans to address the needs identified by their workers**, and establish regular engagement practices to ensure ongoing improvement and monitoring.



Decathlon collaborates with several external service providers - labour solutions (since 2022) as well as Ulula and Diginex (since 2023), to adapt to the requirements of its suppliers. This allows the company to deliver personalised assistance (internet access, smartphones, languages spoken by employees, etc) and ensures that it addresses the supplier's specific needs effectively. Moreover, it guarantees **confidentiality, easy access for respondents** and a user-friendly experience.

- **NEXT:** Increase survey scalability & SOP efficiency to reach more suppliers
- **NEXT:** Review project management to share ownership of the strategy with suppliers and make them more autonomous in running the annual EWB campaign.

4.3. Screening tool for production sites

Apprise Audit App

Decathlon collaborated with [Diginex](#) to use the [Apprise Audit App](#), which **permits real-time, anonymous and confidential feedback on working conditions of workers across the supply chains in Priority risk countries**.

This specific tool is strategically employed only within a prioritised scope (cf. section 2.2) and when a risk-based approach indicates its necessity. This does not apply to other reporting mechanisms presented above (Whispli is accessible to anyone at any time, and the EWB survey is regularly distributed to all team members for broader feedback).

Deployed as an extended pilot in 2022, the tool has helped Decathlon's internal social assessors to focus on key topics that had been voiced out by the workers and go deeper to authenticate them through triangulation of data points.

In order to ensure that the teams can quickly and effectively address potential issues, safeguarding the rights and well-being of all stakeholders, Decathlon worked in 2024 to build :

- a comprehensive dashboard to visualise alerts across its global supply chain, by country and supplier - with Diginex ;
- an alert management procedure with [The Remedy Project](#) ;
- a clear governance framework regarding remediation of forced and child labour alerts from Apprise

Changes of governance in 2024 (as described above) led the teams to review some of their next steps in this project. In this context, the planned focused engagement with two suppliers per zone following the pilot programme, is to be adapted and postponed. The company remains strongly committed to this initiative and will work to successfully implement it across its supply chain when possible.

-
- **NEXT** : Based on prioritisation (2.2), identify suppliers for the deployment of the Apprise tool
 - **NEXT** : Collaborate with an external implementation partner to ensure the effective and practical application of the governance framework, in order to bridge gaps and validate the proof of concept
 - **NEXT** : Remediate potential alerts identified via the process

5. MEASURING EFFECTIVENESS

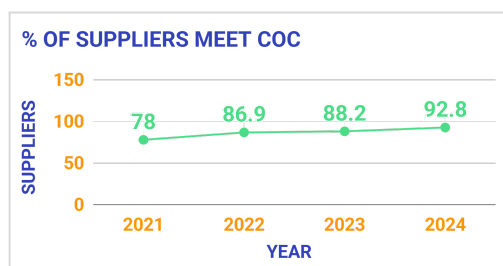
5.1. Indicators for progress



92,8% of suppliers comply with the Code of Conduct for manufacturing suppliers

This indicator is calculated using % of **rank 1 production sites rated A, B and C**, meaning there is no immediate risk for the health or the fundamental rights of workers. The teams are constantly working to improve the company's performance on these matters.

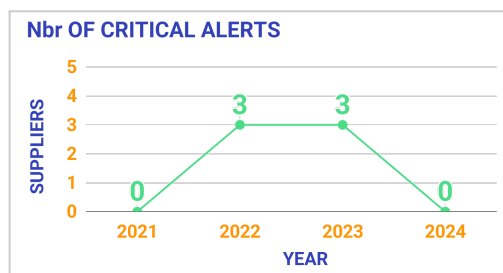
→ *Target: 90% compliant suppliers by 2026*



0 critical alerts through the Apprise tool
(number of alerts from prioritised suppliers)

Decathlon decided in 2024 to **focus its efforts on ensuring actionable outcomes** and governance, and had to **postpone the implementation of the Apprise tool** originally planned. The teams however acted decisively in Taiwan, dismantling unethical recruitment fee practices (cf. section 6). They established clear, fair repayment standards and are supporting suppliers in driving this systemic change.

→ *Target: 100% of received alerts remediated*



2 suppliers receive the new e-learning on "Modern Slavery" (since 2023, cf below)

This indicator is a measure of the **number of suppliers who have taken the e-learning on Modern Slavery**. In 2023, Decathlon refreshed its e-learning on Modern Slavery by opening the training module to Decathlon's suppliers in Level 1 Priority countries and have included specific modules on legislations and migrant employee recruitment. The deployment of the training originally planned in 2024 was delayed due to internal context (cf. section 3.5), hence the result for 2024.

→ *Target: 100% of suppliers in prioritised countries (cf. section 2.2) complete the e-learning by 2026*

5.2. Internal assessment

Internal assessment: scorecards

In 2022, Decathlon set up an **internal assessment tool for the vigilance programme** in order to measure the implementation of social risk management frameworks and resources (health and safety, human rights) **in various sectors**. This tool took the form of a scorecard, that regularly inventories the situation in the countries where Decathlon is established. This inventory enables the SHDD team to monitor the effective implementation of existing risk management frameworks/ means in the subsidiaries: Are they known to local teams, used, effective, appropriate?

This scorecard is the result of **quarterly data collection** (from local and central teams), which is then transcribed into scores, positioning each country on a risk scale ranging from very limited to critical risk. Results are used to identify successes/ areas for improvement, to discuss best practices and challenges and to raise the alarm in the event of a widespread problem to improve the risk management frameworks and means in place. The scorecard is for now based on a **limited number of indicators** in order to start the process, on the following topics - relevant for forced labour matters:



The indicators evolve as the process matures and depending on needs identified with the central teams (human resources, sustainable development, production, safety, legal, etc.). Eventually, the scorecard is intended **to ensure knowledge and control of risk in a transversal manner**, through regular reviews at the global level.

In 2024, the data collection process was transferred on a self-assessment tool used by Decathlon for internal control on financial and non-financial subjects, to allow for more efficient monitoring and standardisation of processes. This also allowed the inclusion of supporting documents to back up the data collected.

-
- **NEXT:** Review topics included in the scorecard to include more indicators, and continuous review of the process
 - **NEXT:** Shift from quarterly to bi-annual frequency, to focus on the analysis of results and potential action plans

6. REMEDIATION

Frameworks and initiatives mentioned in this document notably serve to correctly and constantly identify risks of modern slavery in Decathlon supply chain. When possible, efforts are deployed to prevent that this risk occurs. However, in spite of these, problematic situations and/or contexts will arise. **It is essential that the company is ready to react, in order to address specific cases** (for instance brought up via the reporting mechanisms detailed in Section 3.5) **as well as broader, more systemic issues** leading to a riskier environment for workers.

In 2024, Decathlon decided to enhance its **remediation efforts in Taiwan**, specifically targeting the issue of **recruitment fees and costs**. The primary objective was to establish a robust and standardised framework for the repayment of such fees, ensuring fairness and transparency for all parties involved. Actions included:

- Preliminary efforts to **define a clear repayment baseline** to eliminate ambiguity ;
- **Governance structures and accountability frameworks** have also been outlined to support the consistent application of the Employer Pays Principle, ensuring that employers cover the full cost of recruitment, not workers
- The next phase will focus on actively **engaging with suppliers** to raise awareness of these new standards, and to support them in complying with these requirements

Decathlon has actively partnered with expert external organisations to benchmark best practices, with a specific focus on investigation and remediation protocols that are deeply embedded within the overall governance structure.

The company also identified a pool of external organisations that have previously provided a range of such services, categorised based on their specific areas of expertise and regional presence, enabling local teams to easily select the most suitable partners.

-
- **NEXT:** Continue to remediate with concerned suppliers on critical issues identified via Apprise deployment
 - **NEXT:** Build competencies of referents in standardising the remedy
 - **NEXT:** Ensure the suppliers adhere to remediation protocols established
 - **NEXT:** Finalise the *Governance structures and accountability frameworks*

Testimonies from Decathlon's partners

“ The Remedy Project has been actively supporting Decathlon's renewed efforts in developing and implementing its Forced Labour Strategy with key enhancements to its Dormitory Guidelines, Ethical Recruitment Guidelines and Employer Pays Principle. This is complemented by the development of practical implementation tools including an Alert Management Protocol, a Severity Matrix and investigation and remediation protocols – designed to identify risk, triage and resolve alerts raised through the deployment of Apprise. At Decathlon's request, TRP has also conducted Human Rights Impact Assessments, and more recently TRP has been engaged in supporting Decathlon's downstream risk assessment efforts. We look forward to continuing our meaningful collaboration with Decathlon in advancing responsible business practices. ”

Archana Kotecha, CEO and Founder, The Remedy Project

“ DIWA , formerly VSEA was engaged by Decathlon to assess conditions at one of its Taiwanese suppliers and the Remediation Plan was based on the findings of that assessment. DIWA's scope was later expanded to assist the supplier to set up the necessary policies and procedures as it prepared to implement the employer-paid recruitment model, a shift which the supplier planned to make in January 2025. Improvements made by supplier as a result of DIWA's interventions to date include:

- a decision to implement the Employer Pays Principle (EPP)/ Zero Fees to Workers recruitment model ;
- an updated Human Rights Policy to reflect ethical recruitment standards ;
- the development of key policies and procedures to support the implementation of EPP, notably a Tripartite Agreement between supplier, its labor agent, and Decathlon ; recruitment procedures ; and due diligence procedures. ”

Coco Bagodian , Executive Director of DIWA

7. CONCLUSION

Decathlon remains committed to diligently identifying key challenges within its supply chain regarding modern slavery and child labour matters, enhancing governance through the implementation of enforceable documents, and upskilling its internal workforce, and relevant suppliers, to effectively address these complex issues throughout its value chain. More broadly, **actions in 2025 will include:**

Prevention :

- implement the revised e-learning & webinar programme on modern slavery with internal teammates and suppliers in risky areas ;
- upskill Decathlon referents on detection, verification and remediation of situations linked to forced labour ;
- promote the organisation of webinars by referents, tailored to their respective countries or regions and accessible in local language.

Detection :

- initiate targeted assessments following issues identified via the Apprise tool, in collaboration with external expert organisations.

Remediation and corrective actions :

- improve the process to address critical alerts by zone / country ;
- continue to collaborate with external stakeholders to co-build remediation plans.

Governance :

- work on management systems to tackle forced labour in more sectors of Decathlon's value chain ;
- rework the definition of rank N suppliers in Decathlon's various industrial processes ;
- strengthen the approach on raw materials (cf. Decathlon Vigilance Plan 2024) ;
- develop a global approach on suppliers according to their rank in the value chain, the commercial relationship with Decathlon and sectoral risks ;
- develop a framework on forced labour and child labour Remediation SOP.

Acknowledgements:

Decathlon thanks everyone who participated in developing this Statement: all internal contributors for their involvement in the processes, external stakeholders, associations and organisations for their support

The drafting team:












Krishna Kumaar Dhamodaran, Mathilde Bénard

8. NOTES & APPENDIX

8.1. Notes

1. **Verisk Maplecroft:** Consultancy and research firm specialised in global risk data and country risk analysis: <https://www.maplecroft.com/>
2. cf. **ILO, Walk Free, IOM**, Global Estimates of Modern Slavery, 2022.
3. Available at: <https://sustainability.decathlon.com/legal-documents>
4. **International Organisation for Migration:** UN agency, leading in the field of migration and works with governmental, intergovernmental and non-governmental partners: <https://www.iom.int/fr/>
5. **Ecovadis** is a platform for the non-financial assessment of suppliers on their CSR performance, including environmental, labour, human rights, business ethics and responsible purchasing: <https://ecovadis.com/fr/>
6. **CSR risks** are identified through a structured mapping around three areas: geographical location, sector of activity and volume of sales with the supplier. Buyers identify other risk qualification criteria through an annual review of their supplier panel.
7. **Mekong Club** is a non-profit organisation that focuses on working with the private sector to address modern slavery: <https://themekongclub.org/>
8. **International Labour Organisation:** Tripartite UN agency bringing together governments, employers and workers to promote decent work for all: <https://www.ilo.org/global/lang-fr/index.htm>
9. **The Engagement and Well-being Survey** is an open-source survey based on employee engagement and well-being developed by Nike, designed to help suppliers better monitor and facilitate factory worker engagement: <https://www.laborsolutions.tech/post/>

8.2. Major applicable due diligence laws

| Country | Date | Law |
|--|-------------------|---|
|  European Union | 12 December 2024 | EU Regulation prohibiting products made with forced labour on the Union market - <i>in effect in 2027</i> |
|  European Union | 24 May 2024 | EU Corporate Sustainability Due Diligence Directive Directive - <i>in effect in 2027</i> |
|  Canada | 11 May 2023 | Fighting Against Forced Labour and Child Labour in Supply Chains Act - <i>in effect since Jan 2024</i> |
|  European Union | 16 December 2022 | EU Corporate Sustainability Reporting Directive - <i>in effect since Jan 2023</i> |
|  Germany | 11 June 2021 | German Supply Chain Due Diligence Act - <i>in effect since Jan 2023</i> |
|  USA | 23 December 2021 | Uyghur Forced labor Prevention Act - <i>in effect since June 2022</i> |
|  Switzerland | 3 December 2021 | Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour - <i>in effect since Jan 2022</i> |
|  Netherlands | 13 November 2019 | Child Labour Due Diligence Law - <i>yet to be implemented</i> |
|  Australia | 18 September 2018 | Modern Slavery Act - <i>in effect since Jan 2019</i> |
|  European Union | 17 May 2017 | Regulation 2017/821 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas |
|  France | 27 March 2017 | Law No. 2017-399 on the Duty of Vigilance of parent companies and contracting companies |
|  United Kingdom | 26 March 2015 | Modern Slavery Act - <i>in effect since July 2015</i> |
|  Singapore | 31 December 2014 | Prevention of Human Trafficking Act - <i>in effect since March 2015</i> |
|  USA / California | 30 September 2010 | California Transparency in Supply Chains Act - <i>in effect since Jan 2012</i> |

8.3. Appendix

16 industrial processes for direct purchases :



15 identified categories for indirect purchases as of 31/12/2024



Correlations between Verisk Maplecroft (ISSB) sectors and indirect purchasing categories

| Verisk Maplecroft sectors (ISSB) | Decathlon categories |
|---|------------------------------|
| Sea freight and road transport | Transport and logistics |
| Commercial banks | Finance |
| Advertising and marketing | Communications and marketing |
| Professional and commercial services | Site operation |
| Software and IT services / IT equipment | IT and digital |
| Engineering and construction services | Construction |

8.4. Signature

This statement underwent a consultation process with relevant entities controlled by Decathlon SE, in order to issue a joint Modern Slavery Statement with those needing to comply with local regulations (cf. [Appendix](#)).

"I have the authority to bind Decathlon"

A handwritten signature in black ink that reads "Jean-Marc LEMIERE". The signature is written in a cursive style with some capitalization.

Jean-Marc Lemière,
Decathlon SE Chief Financial Officer, member of the Executive Committee

21st May 2025