



MODERN SLAVERY STATEMENT 2025

May 2026

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 value chain, for the **financial year starting January 1, 2025 and ending December 31, 2025**.

The elements displayed in this document are to be considered as a **part of Decathlon's global risk management initiative**. 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 Child Labour Due Diligence Act (2019), the German Supply Chain Diligence Act (2023), and the EU Corporate Sustainability Due Diligence Directive (2024).

The efforts and means put in place to assess and address modern slavery risks are to be read in this broader understanding, considering the means deployed by Decathlon targeting all risks existing in its value 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, acknowledging that such situations often leads to situations of modern slavery which can often lead to instances of slavery as well. The term "modern slavery" will be used in this document as encompassing child labour matters as well.

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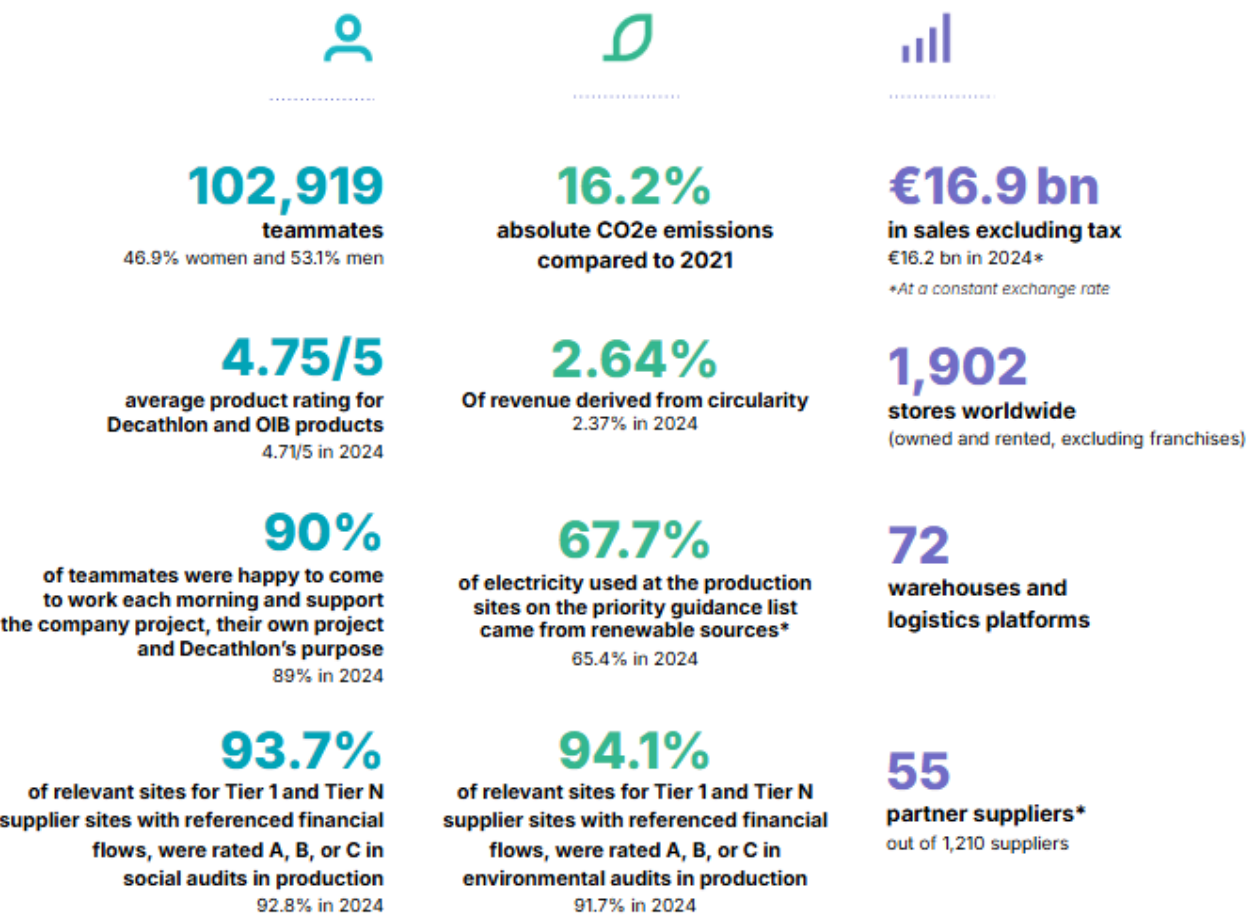
1. BUSINESS & VALUE CHAIN

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.

Thanks to its 102,919 teammates, Decathlon developed worldwide and now has 1,902 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.

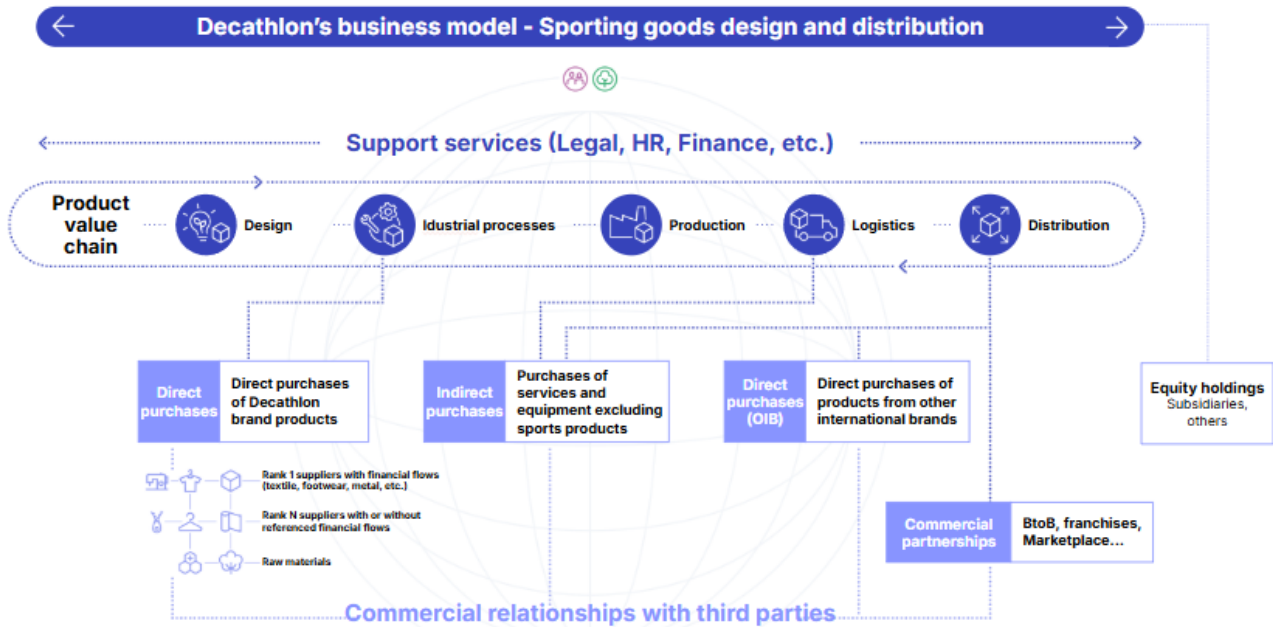
Decathlon in numbers



* **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 a spirit 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**.



Tier 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.

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

*Decathlon's own brand products

2. RISK MAPPING

2.1. General HREDD risk mapping

A risk mapping is performed annually by the Decathlon's Human rights & environment due diligence (HREDD) team along with a variety of actors, in order to highlight areas of focus. This analysis includes environmental and **social risks of both Decathlon's own operations and those of its commercial partners**. The 2025 mapping identified *inter alia* the following risks in the value chain, relevant to this reporting :

HUMAN RIGHTS RISKS	RAW MATERIALS	INDUSTRY	TRANSPORTATION	INDIRECT PURCHASES	OWN OPERATIONS	FRANCHISES
Child labour	●	●	●	●	●	●
Decent wages	●	●	●	●	●	●
Decent working time	●	●	●	●	●	●
Forced labour	●	●	●	●	●	●

Risk level*** : ● Moderate ● Significant ● Major

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.

In order to prioritise risks, the **analysis considers three parameters : sectors, countries and activities**. The sectors used by Verisk Maplecroft are aligned with the international sector classification developed by the SASB. In order to prioritize high-impact areas, the countries covered now represent 80% of the activity (measured by purchases volumes, sales or headcount, depending on the sector). Since 2024, this coverage has been complemented by the inclusion of risks associated with franchise partners. The analysis is then weighted according to each country's share of direct procurement volumes, revenue, and number of teammates, to allow for the prioritisation of the most significant risks. At the end of 2025, Decathlon began evolving its risk mapping methodology to deepen the consideration of severity and probability criteria in the assessment and prioritisation of risks.

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 mentioned above, **Decathlon chose to prioritise the topic of migrant worker welfare within its manufacturing supply chain**, when addressing modern slavery risks. With the general HREDD risk mapping as its base, the company’s current focus includes tier 1 and potential tier 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. These initiatives aim to foster long-term improvements in their working conditions.

In addition to this chosen focus, Decathlon’s teams worked on a methodology to obtain a **social risk score, allowing for tailored mitigation measures** depending on the supplier or the country concerned. The tool supporting this framework was **launched in 2025**.

A risk score is calculated for each production site with financial flows : a first score combines Verisk data (including on migrant workers, forced labour and health & safety) and the number of workers, and is then adjusted with the results of the site’s last social audit (cf. section 3.3). The resulting risk level determines the frequency of social audits on the site (see below), as well as an external certification for all sites with financial flows.

Social risk score outcome:

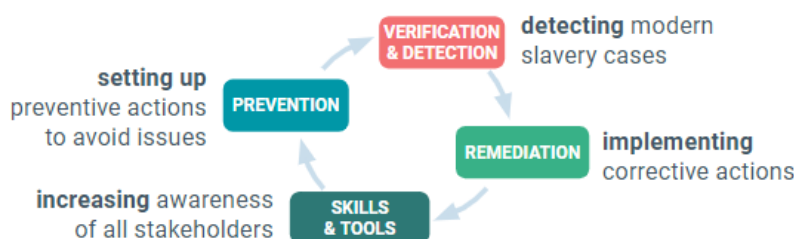
-  Critical risk:
annual social audit
-  High risk:
every two years
-  Medium risk:
every three years
-  Low risk:
external certification

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 requires efforts to tackle modern slavery. Decathlon continuously improves its management of these issues especially for suppliers in production since 2002, notably *via* :

- **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 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:



The year 2025 was marked by **governance changes** in Decathlon, affecting the teams working on modern slavery matters. This led to a **redefinition of strategies and priorities**. Several "next steps" planned in 2024 and highlighted Decathlon's previous reporting were therefore either postponed or re-evaluated. These elements are being thoroughly reviewed as the new organisation is restructuring the company's global approach to modern slavery. This approach aims to ensure more efficient frameworks, with a particular focus on remediation.

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 (as well as 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.

The Code was updated in 2025, clarifying existing environmental and social standards, and integrating news matters including protection of personal data, cybersecurity and artificial intelligence.

[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:** Implement the revised Codes of conduct

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 & safety ;
- explains the due diligence process on these topics.

Dormitory Guidelines

The Dormitory Guidelines³ inform Decathlon's suppliers on the **company's requirements to guarantee a decent living condition for its employees**. Dormitory facilities can be assessed through a corresponding 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 audits carried out during 2025 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 to provide adequate, decent and gender-responsive living conditions for migrant workers and spacing standards for workers' accommodations. This supports Decathlon's global commitment to safeguard human rights and promote decent living conditions across its supply chain.

Ethical Recruitment Guidelines

The Ethical Recruitment Guidelines³ inform Decathlon's suppliers on **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.

Partner suppliers have to 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 : 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. Since 2024, Decathlon conducted in-depth assessments of selected recruitment intermediaries in Taiwan (cf. section 6) and realised a strategic risk-mapping of the **Taiwanese supplier panel**, segmenting sites based on their maturity and alignment with the Decathlon's global human rights standards. This resulted in a specific Taiwan Ethical Recruitment Policy.

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- **NEXT:** Work on the implications of the updated Guidelines deployment, and provide support for compliance
 - **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](#)). Industrial teams continued their transformation work in 2025 and finalised a **global direct purchases Policy**, defining clear governance and responsibilities to drive operational excellence.

Supplier segmentation within the value chain has been updated, distinguishing between Tier 1 and Tier N referenced suppliers with direct financial flows, and Tier N referenced suppliers without direct financial flows*. Besides this evolution, suppliers' categorisation remains stable as follows:

- **"partner" suppliers** (55 in 2025) 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.

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 tier N suppliers and develop a global approach on suppliers according to their position in the value chain, the commercial relationship with Decathlon and sectoral risks.

Given the complexity of its upstream value chain, Decathlon sometimes maintains direct business relationships, including financial flows, with suppliers beyond Tier 1 (Tier N). Regarding **Tier N suppliers without a direct financial flow**, that complexity led industrial teams to develop a prioritisation method, to identify and engage key partners on social and environmental issues, in spite of the significant operational challenge coming from the lack of immediate levers. In order to tackle **issues linked to raw materials**, Decathlon continues its initiatives on certain key materials (cotton, polyester, metal). In addition to investing in the 5 strategic material families identified as the most impactful (volume and environmental footprint)**,

* This represents the supplier's position within the manufacturing chain, from the extraction or cultivation of raw materials through the various processing stages to the assembly of the finished product.

** Metals (aluminum, steel, cast iron), textiles (natural, synthetic), pulp and paper, plastics, rubbers

Decathlon realised a mapping of environmental and social impacts covering 25 raw materials in 2025. Combined with purchasing strategies and volumes, the results of this mapping confirmed or advanced decisions and trade-offs regarding priority materials, while also structuring the resources implemented to reduce material impacts (traceability, certifications/labels, etc.) around a common methodology.

Regarding Decathlon's products from other international brands (OIB), a due diligence approach is in development since 2023 and the appointment of a **dedicated compliance leader** (to work *inter alia* on corporate sustainability due diligence). The existing framework included a Distribution Agreement engaging the tiers on ESG standards, and attaching Decathlon's Code of Conduct for business partners (cf. [above](#)). 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 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. In 2025, the OIB team implemented a strategic annual review for key suppliers, based on six core criteria: financial, economic, environmental, quality, supply chain, and compliance.

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- **NEXT:** Finalisation of methodology and associated frameworks on the prioritisation method regarding Tier N suppliers without a direct financial flow
 - **NEXT:** (OIB) Global risk assessment regarding the scope, incorporating ESG criteria

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) ;
 - 311 critical suppliers in 2025
- non-financial assessment using the EcoVadis platform (cf. [above](#)), to determine the suppliers' ESG
 - 75 % of critical suppliers have an EcoVadis assessment or equivalent ESG assessment
- maturity level and decide on follow-up actions (28 countries were concerned in 2025) ;

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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 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 2025, 899 of Decathlon’s suppliers’ sites were evaluated (713 from tier 1 suppliers), through 554 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	• minimum legal working age of 15 • adequate areas and clear listing for children on sites	• no prison labour • no retention of official documents
INSUFFICIENT	• proof of the age of employees • no historical child labour (last 6 months) • young workers have a protected status respecting at least local regulation	• 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
CONTROLLED	• 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.

* The calculation method for this data was revised since 2024 : the follow-up audit (after corrective action plans) was counted as another full audit while it is now considered as one with the initial audit.

Once the audit has been performed, the results classify the supplier’s site in one of 5 categories, each leading to a different follow-up (see below). The **corrective action plans should enable the site to correct any identified non-conformity**, such as remediation measures in the event of unfair wages.



3.4. Responsible teammates

In order to manage the risks efficiently, **Decathlon's policies and frameworks function with key actors** within its 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, 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)

Locally recruited and speaking the suppliers' language and understanding the country's culture. This enables them to better identify local issues. The OPM SD are **constantly training the production teams**, and for some improving the tools/ methods used. Following a reorganisation in 2023 with a specific emphasis on social, Decathlon now counts 49 OPM SD and 5 Zone sustainability directors with this responsibility. In addition, 79 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 partially dedicate their time to :

- empower local teams
- deploy tools
- initiate 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 value chain, focusing on protecting the rights of those most impacted by the company's 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.

In the course of 2025, the topics managed within this team were integrated into core business activities, in order to better align them with strategies and their implementation.

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, while including the company's social responsibility policies and considering the respect for human rights and prevention of modern slavery.

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

Global Human rights & Environmental Due Diligence team (central)

The HREDD 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 value 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 on the internal **platform for teammates**.

The training program 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.

In 2025, Decathlon centralised all training modules on its internal platform. This enabled the deployment of the e-learning program to 45 **teammates responsible for managing high-risk production sites**. Targeting these key operational roles helps **ensure that those at the front lines of supplier management are equipped** to uphold corporate accountability and responsible sourcing standards.

→ **NEXT:** Redesign overall training content and deployment, to allow for a more targeted and meaningful impact

Webinar on "ILO* indicators"

**International Labour Organisation⁸*

In 2022, Decathlon launched a **dedicated webinar on "ILO Indicators of Forced Labour," tailored for key stakeholders in its production countries**. The session combines an 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 connections to their roles within supplier factories. The webinar equips teams to recognise and react to potential risks in the manufacturing sector more effectively.

One session took place in 2024 for representatives from 8 different countries. Bringing together the internal team and supplier management, the session successfully highlighted the implications of ILO Indicators for rightsholders. The representatives could then further use and share their understandings to their colleagues and partners, through their local/ sectoral actions.

In 2025, Decathlon provided **targeted training to 7 priority suppliers across 8 key production countries**, focusing on the areas of highest impact within the supply chain. Through the adoption of a **Train-the-Trainer (ToT) model**, Zone Referents could cascade their expertise directly to supplier management teams.

→ **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

Focus assessment & Capacity building for internal assessors

Decathlon always strives to **empower its assessment teams**, in order to enhance their ability to identify and address critical forced labour risks. With the **support of expert partners** in 2023, the company developed a corrective action plan on these topics, in order to ensure standardised remediation and strengthened governance.

Decathlon 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.

In 2025, **Decathlon tested a more demanding process** regarding suppliers' workers feedback systems (cf. section below on reporting mechanisms), **including a focused assessment** initiated when alerts flag a significant risk based on predefined severity. This aims at ensuring that workers' alerts directly inform targeted action through the governance framework. The process however is not yet ready for further deployment.

→ **NEXT: Restructure the alert & focus assessment process for more efficiency**

4. REPORTING MECHANISMS

4.1. Whistleblowing system

Presentation

Alerts regarding potential human rights or environmental wrongdoings can be raised by various stakeholders within the Decathlon ecosystem : teammates, customers and users, communities and residents, civil society (NGOs, experts, media and social networks), shareholders and investors. These alerts **may take many forms** : studies and reports, publications, direct contacts, or submissions via the reporting platform.

Indeed, the company has implemented in 2019 an **independent whistleblowing tool, ensuring confidentiality**, in order to comply with the regulatory requirements regarding business ethics and whistleblower protection. In order to mutualise resources, the tool also applies to HREDD linked alerts. The tool has been **deployed in all countries and regions** where Decathlon operates, in the country's language(s).

Teammates can access the "Whispli" platform via the intranet.
Externals (customers, suppliers, civil society, etc.) can access it
on sustainability.decathlon.com 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. The platform is communicated via various channels (emails, trainings, posters, etc.), especially at local level ; this KPI is monitored biannually (cf. section 5.2).

In 2025, reports received via the Whispli platform increased by 35.5%. Accessibility to the platform, combined with internal employee communication, has contributed to a greater awareness of the tool and the subsequent rise in reporting.

Most significant matters once again involved employment contracts, moral harassment, and well-being in the workplace. Once formally categorised, these **alerts are handled on an individual and confidential basis**. The handling procedure has been further improved to provide greater detail and structure, and ensure a more relevant communication to teammates in order to reinforce trust in the process, its confidentiality, and whistleblower protection.

External deployment

The Whispli platform is available on Decathlon’s sustainability website, and is **referenced in its Codes of Conduct** (both for production suppliers and other business partners). It is also available on some countries’ official commercial websites (Spain, Germany, Italy, etc.).

Decathlon acknowledges the **importance of making this solution accessible to the most vulnerable groups, particularly among its industrial partners and suppliers**. After having implemented Whispli with 7 suppliers, Decathlon suspended the deployment in 2025. This follows the identification of areas for improvement regarding training, the implementation process, and the handling of alerts by partners. This decision allows for a redesign of the deployment strategy, better adapting it to operational realities to ensure optimal accessibility and use of the tool.

In 2025, the rollout of Whispli continued, allowing for an **increase of external alerts received** via the platform. Whispli indeed recorded 66 external alerts, the **majority of which pertained to employment contracts and moral harassment**. These issues will be prioritised during upcoming social audits in the concerned countries. Regarding well-being at work, this topic is integrated into the EWB survey conducted annually among workers at Decathlon’s suppliers (see section 4.2). Further deployment of the platform will enable Decathlon to identify potential issues proactively and incorporate them into progress plans developed alongside its suppliers. In addition to these figures, 5 alerts were received through alternative channels:

Among the alerts received in 2025, 1 alert regarding child labor (between 15 and 18 y.o.) involving a cleaning service provider and 2 alerts regarding working hours involving security and cleaning service providers.

→ **NEXT:** Externally, continue the implementation of the platform with industrial partners, to cover critical* risk sites (following a new classification in 2026 on the basis of two elements: freedom of association and number of workers)

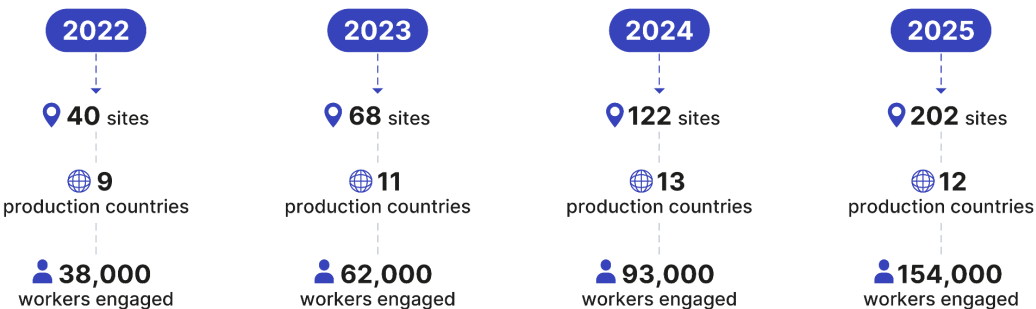
4.2. Wellbeing Survey

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 **allows 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 conducted across all team members).

Deployed as an extended pilot in 2022, the tool helped Decathlon's internal social assessors to focus on key topics that had been voiced out by workers. To ensure that the teams can swiftly and effectively address potential issues while safeguarding all stakeholders' rights and well-being, Decathlon worked in 2024 on :

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

In 2025, Decathlon worked to better associate **digital monitoring** and **localised remediation**, testing new functionalities and **deploying the enhanced tool across 11 suppliers in 4 zones** (collecting around 6200 workers' voice). This deployment focused on making the tool's outputs more actionable, allowing Zone Referents on Forced Labor to address specific concerns voiced by workers, and these concerns to contribute to global remediation strategies.

The company also performed 6 **focused assessments** across 2 countries in 2025 to address specific worker vulnerabilities.

-
- **NEXT:** Restructure the alert management system in order to gain efficiency and impact

5. MEASURING EFFECTIVENESS

5.1. Indicators for progress



93,7% of suppliers comply with the Code of Conduct for manufacturing suppliers

This indicator is calculated using % of **tier 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*



2 critical alerts on modern slavery

In spite of its risk management frameworks, Decathlon may encounter situations of non-compliance on these topics. These situations are identified *via* supplier audits or *via* alerts (from teammates, workers, civil society, etc.). When a non-compliance arises, **remediation is carried out through action plans and follow-up**. Remediation plans are implemented and/or monitored in coordination with those closest to the impact. If the issue cannot be addressed through existing processes, crisis management procedures are activated.

→ Target: 100% of received alerts remediated



7 suppliers trained on the ILO indicators

This indicator is a measure of the **number of suppliers who have followed the ILO Webinar**. The e-learning was reviewed in 2023 to propose a training module to some suppliers, and included specific modules on legislations and migrant employee recruitment.

→ 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, in the form of a scorecard, provides a regular overview of the situation in the countries where Decathlon is established. This overview enables the HREDD team to ensure the effective implementation of existing risk management frameworks and means in the subsidiaries: do local teams know and use them? Are they efficient, appropriate ?

This scorecard is the result of **biannual 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 risk management in a transversal manner**, through regular reviews at global level.

Since 2024, the data collection process occurs *via* a self-assessment tool used by Decathlon for internal control on financial and non-financial subjects. The use of this tool facilitates monitoring and allows to include of supporting documents to back up the data collected. In 2025, the data collection process went from quarterly to a biannual, leaving more time in between to act on the findings.

-
- NEXT: Review topics included in the scorecard to include more indicators, and continuous review of the process
 - NEXT: Focus on monitoring the implementation of action plans triggered by reported results

6. REMEDIATION

Frameworks and initiatives mentioned in this document notably serve to correctly and constantly identify risks of modern slavery in Decathlon's value chain. When possible, efforts are deployed to prevent this risk from occurring. In spite of these however, 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**, 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 the definition of a clear repayment baseline to eliminate ambiguity, as well as governance structures and accountability frameworks to support the consistent application of the Employer Pays Principle (ensuring that employers cover the full cost of recruitment, not workers).

In 2025, the teams focused on **actively engaging with suppliers to raise awareness** of these new standards, and to support them in complying with these requirements

7. CONCLUSION

Decathlon remains committed to diligently identifying key challenges within its value 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.

In a context of reorganisation, focused on a maximised impact of the processes put in place, **actions in 2026 will include the reprioritisation** of the specific issues, within the modern slavery scope and root causes, that Decathlon chooses to address ; the **global restructuring of the reporting mechanisms** (alerts, etc.) processes in order to gain efficiency ; and work on a **"zero fees" approach**, based on the experience in Taiwan to prevent risks on recruitment fees for migrant workers. This will involve the full deployment of the Employer Pays Principle and the testing of Direct Hiring Programs in Taiwan.



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 Kumar Dhamodaran, Jérémie Piolet, 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/>

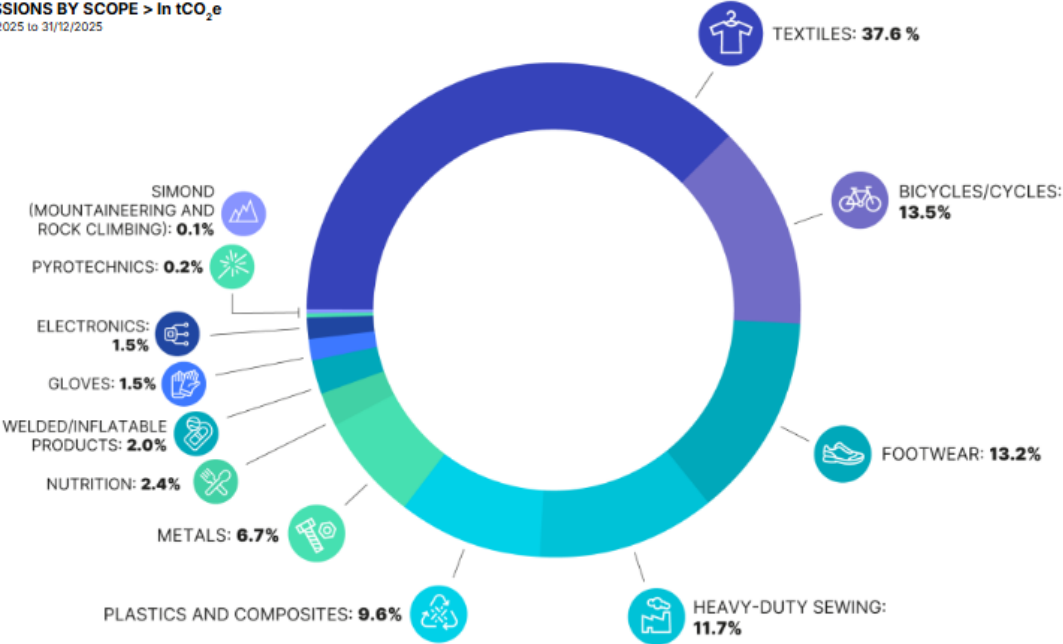
8.2. Major applicable due diligence laws

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>
 Mexico	17 February 2023	USMCA (United States-Mexico-Canada Agreement) Forced Labor Import Ban - <i>in effect since May 2023</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 :

BREAKDOWN OF DECATHLON'S GREENHOUSE GAS (GHG) EMISSIONS BY SCOPE > In tCO₂e
01/01/2025 to 31/12/2025



15 identified categories for indirect purchases



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"



Jean-Marc Lemi re,
Decathlon SE Chief Financial Officer, member of the Executive Committee

26th May 2026

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