

deuter

CODE OF CONDUCT



FOREWORD FROM SCHWAN-STABILO GROUP MANAGING DIRECTOR

Dear co-workers,

Success is not by chance. Success is down to commitment and inventiveness. It is a result of foresight and entrepreneurial bravery. And success is always based on reliability. In a world where everything is in constant flux, being reliable is one of the most important cornerstones of life – whether in business or in our private lives.

Reliability has played a key role in our present group of companies since it was founded over 160 years ago. Reliability, coupled with conduct that's honest, equitable and transparent, is what is led to our international success and Schwan-STABILO's excellent reputation. Both at home, here in Germany, and around the world. It is something we are very proud of.

This Code of Conduct encompasses the most important standards and principles that underpin our conduct and behavior, and which we also expect from our business partners. This gives us, our co-workers, customers and business partners a solid frame of reference. The deuter Code of Conduct reflects our corporate identity, which is characterized by a willingness to assume personal responsibility and by conduct that complies with the law and is always ethical.

As such, our Code of Conduct also reflects our own personal mindset. We are convinced that it is precisely this mindset that has made us so successful over the past decades and will continue to do so in the future. Let us all do everything we can to ensure that we are viewed as reliable by those we deal with.

With heartfelt thanks,

Sebastian Schwanhäußer



OUR RESPONSIBILITY

Dear colleagues,

A love of mountain sports, the joy of nature, and the products we make, are what connect us and spur us on every day. This passionate approach and the high quality of our products have been the backbone of our company for more than 100 years. Together with our co-workers and business partners, we regularly develop pioneering products that raise the bar in terms of sustainability, functionality, and expert design.

As a family business and part of the Schwan-STABILO Group, we continue to place people and the natural world front and center, despite the new challenges that each year brings with it. Second only to health, which is of utmost importance to us, we value lasting, trusting and transparent working relationships both within our company and together with all our partners.

To foster trust and sustainable business practices, we have chosen to work with only two manufacturing partners for many years now. Which is why we are especially proud of our long-standing relationship with Duke, which was recognized with the 2022 German Sustainability Awards Global Partnerships prize.



We want to continue to lead the way in our industry. We want our business to be sustainably profitable, to develop trend-setting concepts, and be perceived as an authentic and reliable mountain sports brand. All the while, keeping our corporate values clearly in focus.

In business, as in mountain sports, you can only lead people where you yourself are willing to go. I take this to heart and do my best to lead by example.

Here's to many more years of productive collaboration,

Robert Schieferle



PREAMBLE

Our business is built around people – whether it's co-workers, customers, business partners or shareholders. Which is why we carefully consider our actions in the knowledge that these have consequences both today, and into the future – always striking a balance between economy, ecology and social responsibility.

This Code of Conduct is built upon this premise and sets out the fundamental principles and rules for all our activities – transparently, openly and bindingly.

Our Code of Conduct is divided into four areas: Business conduct, working relationships and the workplace, conduct in society, and confidential data and information handling.

Each chapter is underpinned by the central values that together we defined: Mountain sports. Excellence. Responsibility. Focusing on these three values helps guide us in what we do, and how we do it. These are the values that we practice, every day, and in everything we do.



OPEN AND HONEST COMMUNICATION AT ALL LEVELS

Expressing concerns openly

We practice a work culture where all employees and co-workers are encouraged to openly express their opinion, to stand up for their beliefs, and to call to attention unacceptable behavior, especially when it conflicts with this Code of Conduct.

Possible breaches of laws or regulations can also be reported using the whistleblower system. Contact details are available on the deuter and Schwan-STABILO websites:

<https://www.deuter.com/int-en/whistleblowing>

<https://www.schwan-stabilo.com/en/company-group/whistleblowing>

Any reports will be dealt with in utmost confidentiality, and without risk of retaliation.

Leading by example

The Schwan-STABILO Group and deuter actively communicate the guidelines and agreements fundamental to the Code of Conduct. At deuter, we implement these and believe in fostering mutually trusting relationships with one another.

Our management team is required to lead by example and, to a certain extent, have their actions judged against the Code of Conduct. They are the first point of contact for questions about these rules and must ensure that all co-workers are fully aware of and understand the Code of Conduct. As part of their leadership role, they prevent inappropriate behavior or take measures within their areas of responsibility to avert breaches of the rules. Fostering a trusting and solutions-focused environment for co-workers and managers to work together leads to honest and open communication and mutual support.



1. BUSINESS CONDUCT

Legal compliance

Compliance with legal and statutory regulations is important to us, as is adherence to internationally recognized standards for good and responsible corporate governance and administration. Where more stringent internal and national regulations exist, these always take priority.

Fair competition

We firmly reject any agreements with our business partners and suppliers that restrict competition or violate antitrust laws.

Conflicts of interest

All employees must refrain from engaging in situations in which there is a conflict of personal interests with those of the Schwan-STABILO Group. Should a conflict of interest arise, all parties agree to make this known to the company.

Protecting company property

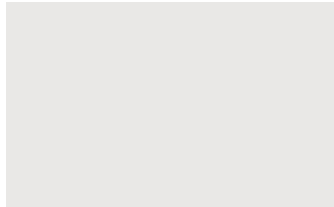
We use our company's property and resources appropriately and with due care. This also means that we protect company property from loss, damage, theft and misuse. This expressly includes the Schwan-STABILO Group's intellectual property, which we protect from unauthorized third-party access.

Anti-Corruption

We resolutely refuse to offer, promise or grant any benefits, directly or indirectly, to public officials or business partners, either in Germany or abroad, in order to achieve favorable conditions or a favorable decision for the Schwan-STABILO Group. Our employees refuse any benefits or promises of benefits, because this can create the impression that employees can be influenced in their business dealings.

Money laundering prevention

We comply with money laundering regulations and take all necessary measures to prevent money laundering at the Schwan-STABILO Group.



2. WORKING RELATIONSHIPS AND THE WORKPLACE

Adhering to human rights and workers' rights

We uphold internationally recognized human rights and the ILO's Core Labor Standards, and, at the very least, ensure that minimum working age regulations are adhered to - and always in line with the applicable national regulations. Where more stringent internal and national regulations exist, these always take priority. We expressly recognize the fundamental right to freedom of association and the right to collective bargaining in the context of national regulations and existing agreements.

Equality and non-discrimination

Equal opportunities and equal treatment are important to us. We reject any form of discrimination in the workplace and are expressly committed to promoting equal opportunities and diversity among employees in terms of gender, age, culture, religion, ability and sexual orientation, taking into account their respective cultural and statutory particularities.

Worker health and safety

All our employees have the right to a safe and healthy work environment. To ensure this, we comply with national rules and regulations.



3. CONDUCT IN SOCIETY

Behavior and communication in public

All employees have the right to express their opinions freely. Individual rights and privacy are safeguarded. As employees, we are aware that we are perceived as representatives of the company when discussing the Schwan-STABILO Group in public.

Climate protection and the environment

We treat the environment with respect and try to minimize our impact. Which is why upholding legal provisions and standards for the protection of the environment is self-evident for us – as is working hard to keep minimizing the use of natural resources and raw materials.

Political lobbying

We firmly reject attempting to exert undue influence on politics and legislation.

Donations and sponsorship transparency

We are fully transparent about donations and other forms of social engagement.



4. CONFIDENTIAL DATA AND INFORMATION HANDLING

Confidential information protection

Confidential information is valuable. Any unauthorised sharing of it is potentially damaging for the Schwan-STABILO Group. We protect confidential information and business documents from unauthorized access and viewing. Our employees also observe these confidentiality obligations in their private lives and when using social media.

Data protection and data safety

All employees have data protection rights. We protect personal data, especially those of employees, customers and suppliers, through meticulous and responsible handling, and process data according to data protection regulations. This also means using appropriate technological and organizational processes to safeguard all company, customer, supplier and personal data against unauthorized access, unauthorized or improper use, loss or premature disposal.

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