



DECLARATION OF PRINCIPLES ON THE HUMAN RIGHTS STRATEGY OF SNIPES SE

according to the German Supply Chain Due Diligence Act

Preamble

SNIPES SE ("SNIPES") is committed to taking responsibility for the social and environmental sustainability of its global business activities. As a global company with a locally focused approach, we consider integrity and reliability to be fundamental principles.

Our mission statement is: "Community First". This refers to our customers, employees, suppliers and disadvantaged people in all the communities in which we operate. This mission statement defines the fundamental values and objectives and forms a binding framework for the management, executives and all employees to shape our daily actions in the workplace and in our collaboration.

We value fair and cooperative dealings with our business partners. Of course, we ensure that people in the countries where the production sites are located can work under humane conditions.

We have been part of the DEICHMANN Group since 2011 and communicate the Code of Conduct, the content of which was developed by our parent company DEICHMANN SE ("DEICHMANN") back in 1999, to our business partners in the supply chain. Since then, we have continuously worked on the further development of our Code of Conduct. Since 2005, we have been involved through our parent company in the BSCI initiative, a program of the amfori association, to improve social standards in global supply chains. Through our involvement in regional and global initiatives, we remain committed to improving social and ecological conditions in supply chains.

Since the opening of the first SNIPES store in 1998, SNIPES has developed into an authentic brand in the areas of hip-hop, streetball, dance and action sports that puts the community first. As a retailer, SNIPES offers modern streetwear and sneakers as well as classic, timeless looks from global brands and its own brands in Europe and the USA.

Our long-lasting and cooperative relationships enable us to achieve and further develop high quality standards while adhering to ethical and ecological principles.

A. Human rights and environmental protection expectations for employees, business partners and other stakeholders in the supply chain

At SNIPES we are committed to respecting human rights, complying with labor and social standards and protecting the environment. We are aware of our responsibility to protect human rights and prevent violations.

SNIPES supports the United Nations 2030 agenda for sustainable development and is aligned with the Sustainable Development Goals (SDGs). In accordance with the requirements of the German Supply Chain Due Diligence Act (LkSG), we implement the necessary due diligence obligations. Our affiliated companies outside Germany also observe the respective national legal regulations regarding due diligence obligations.

We take international agreements into account in our business activities, including those listed in the appendix to the LkSG. These are in particular the following international standards and guidelines:

- The principles derived from the Universal Declaration of Human Rights for Business.
- The United Nations Guiding Principles on Business and Human Rights (UNGPs).
- The core labor standards of the International Labor Organization (ILO).
- The United Nations Convention on the Rights of Children (CNC).
- The Organization for Economic Co-operation and Development (OECD) principles for multinational companies.

Our code of conduct, which is supplemented by the corporate mission statement and other guidelines, forms the basis for the behavior of our employees. However, we do not rely exclusively on compliance with our code of conduct by our global business partners and other parties in the supply chain, but rather believe that only through joint efforts along global supply chains can human rights and environmental violations be effectively identified, remedied and prevented.

B. Our approach to due diligence implementation

At SNIPES we have established a comprehensive risk management that also focuses on human rights and environmental risks in our supply chains. This includes both regular and occasion-related analyzes to identify potential risks. As soon as risks are identified, we implement effective and appropriate preventive measures. If violations are identified, we will take appropriate corrective action. In addition, we have introduced a complaints procedure to effectively investigate and process reports. The effectiveness of our measures is regularly checked and documented. This documentation is integrated into our ongoing reporting process.

I. Risk management

At SNIPES, we aim to identify and minimize the human rights and environmental risks that arise from our business activities in our supply chains. The German Supply Chain Due Diligence Act (LkSG) has prompted us to state our approach more precisely through regular audit processes. Our aim is to develop a comprehensive understanding of potential risks both in our own business area and in our supply chains in order to establish additional preventive measures on this basis.

Our organizational structure is as follows:

The corporate divisions are responsible for selecting business partners in coordination with the management. The purchasing and product management departments are responsible for implementing and complying with purchasing practices, while the Corporate Social Responsibility (CSR) department is responsible for the onboarding process of new business partners and their operating locations. The CSR department at our parent company DEICHMANN acts on behalf of the entire DEICHMANN Group

The CSR department has strategic, operational and central responsibility for the implementation of the human rights and environmental risk management at SNIPES and reports regularly to the human rights officer. In this context, it is the responsibility of the CSR department to manage the onboarding process for new direct and indirect business partners, including their business locations, and to carry out the annual and event-related risk analysis.

In addition, the CSR department is responsible for creating training materials, conducting audits and training on site, particularly in the production facilities of our own brands, and developing processes for implementing the German Supply Chain Due Diligence Act (LkSG) in our own business area. If necessary, the global CSR area receives support from local employees of the DEICHMANN companies, such as quality management, as well as from independent external auditors.

The head of Legal & Compliance at DEICHMANN, who also holds the position of the human rights officer, is responsible for monitoring the human rights and environmental risks and complaints management and reports regularly to the managing directors.

The Services & Safety department is responsible for internal occupational safety in its own business area, carries out appropriate training and regular checks. The Training & Development department is responsible for communicating internal regulations.

Through these established structures, we ensure that all employees in all areas of the company assume their responsibility for respecting human rights and environmental protection and integrate them into their daily work processes. If business or social conditions change, particularly in our procurement markets or in relation to our business activities, we take this as an opportunity to continually review and further develop our risk management.

II. Essential risk analysis measures and identified priority risks

At regular intervals, at least annually or as needed, we evaluate human rights and environmental risks that arise from our business activities in our supply chain. Thereby we prioritize the production sites of our business partners, producing our own brand products in risk countries, although we do not differentiate between direct and indirect suppliers in this regard. We value dialogue with affected stakeholders and interest groups.

The risk analysis includes several steps: First, we identify abstract risks based on country risks. The identified risks are then classified based on their severity and probability of occurrence. When prioritizing measures, we take into account both our influence on risk creation and our contribution to it.

In the next step, the CSR department determines specific risks. We rely on external social audits, conducted by third parties, and self-disclosures from our business partners and the findings from our complaints procedure.

SNIPES reserves the right to check the information in the self-disclosures and the results of the social audits of all business partners and those involved in the supply chain itself or to commission external service providers to carry out the check. The CSR department regularly visits the facilities of our production partners in order to get a comprehensive picture on site. This involves checking whether the previously identified risks may exist in the business premises. In our own business area, the CSR department also carries out risk-based on-site reviews.

We have identified the following risks in our supply chain that need to be addressed as a priority:

- Suspicion of inadequate occupational safety
- Suspicion of overtime

We are aware that we operate in an industry and source our products from countries where serious human rights violations, such as child or forced labor, may occur. We therefore already have measures in place before the LkSG came into force taken to avoid such risks. We did not identify any such risks in the 2024 financial year. We continue to work to create an environment to identify these risks at an early stage and to prevent. We have not identified any priority human rights or environmental risks within the meaning of the LkSG in our own business area.

III. Prevention measures

At SNIPES we use various preventative measures to fulfill our responsibility and implement our corporate philosophy. This includes our purchasing practices, which also take into account respect for human rights and environmental aspects, as well as the provision of appropriate training measures. These training courses serve to protect those potentially affected and to minimize and prevent negative effects from our business behavior or that of our business partners.

In accordance with our guidelines for executives and the corporate mission statement, SNIPES managers are obliged to promote social and responsible actions. We conduct regular training for executives and employees in the areas of human rights, occupational safety and responsible behavior in order to increase awareness of these issues.

The CSR department is responsible for implementing preventive measures in the supply chain. This includes the onboarding process, during which our business partners confirm our code of conduct, which sets the ground rules for our cooperation. The CSR department creates its own training materials for various target groups and carries out corresponding training in the company's facilities. If necessary, we offer our business partners additional training on human rights and environmental protection in collaboration with external partners and monitor their participation in these training courses.

In addition, compliance with self-disclosures and social audits is checked on occasion-related and routine basis.

IV. Remedial Actions

If any violations of human rights or environmental protection are identified, we at SNIPES immediately take individual remedial measures. Our goal is to prevent, stop or reduce the extent of such violations. Based on the analysis of social audits, complaints received and on-site visits, we develop effective action plans together with those responsible at the operating sites.

These plans are flexible and adaptable depending on the situation and include root cause identification, awareness training and regular monitoring visits. Through recurring on-site inspections, we ensure that the measures are implemented effectively and used to prevent similar incidents. We continually learn from the experiences and results of these measures and thereby strive to improve the situation.

V. Complaints procedure

SNIPES has set up a publicly accessible complaints procedure that meets the requirements of the LkSG, which enables anyone to anonymously and easily report information about risks or violations of human rights or environmental obligations. This process is accessible to our own employees and external stakeholders both on our company website and via our online shops. In addition, the complaints procedure is available to employees at our production partners' production facilities in the respective national languages via posters on site.

Complaints can be made both in writing and verbally via a secure online portal be submitted anonymously. In selected countries, SNIPES also participates in cross-industry complaints mechanisms.

Independent people who are not bound by instructions examine and treat every complaint confidentially. The whistleblowers are included in the further process via an anonymized portal, whereby the whistleblowers are protected from discrimination or punishment. Complaints that indicate risk or violations lead to risk analysis and, if necessary, appropriate preventative or remedial action.

Detailed information about the complaints procedure, including accessibility and procedural steps, is contained in our publicly available rules of procedure.

VI. Effectiveness test

SNIPES is aware that all preventive and remedial measures as well as the complaints procedures must always meet latest requirements and be continuously developed. We therefore undertake to regularly review the effectiveness of the measures taken, at least once a year, and adjust them if necessary.

This review includes assessing the effectiveness of the measures taken based on the results of the risk analysis carried out regularly and on occasion-related basis. In addition, compliance with our specifications and human rights and environmental expectations is monitored both internally by our employees and externally in our supply chain controlled. To carry this out, we use different procedures such as document checking and auditing.

VII. Documentation and reporting obligations

The human rights officer and the CSR department are responsible for documenting and reporting all measures to implement the LkSG due diligence obligations. This includes results of risk analyses, complaints received, preventative and remedial measures implemented. SNIPES will comply with the legal requirements for reporting. This measure serves transparency and accountability towards all stakeholders and the public.



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