



# DUE DILIGENCE, MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024



**A**mer Sports ([www.amersports.com](http://www.amersports.com)) is a global group of iconic sports and outdoor brands, comprising Arc'teryx, Salomon, Wilson, Peak Performance, Atomic, Armada, ATEC, DeMarini, EvoShield, and Louisville Slugger. Together, we serve a range of sports, including tennis, badminton, golf, football, soccer, baseball, basketball, alpine skiing, snowboarding, cross-country skiing, trail running, and hiking. Our apparel and footwear products, as well as our technically advanced sports equipment, inspire consumers in their efforts to live healthier and more sustainably.

Amer Sports, Inc. shares were listed on the New York Stock Exchange in 2024. During 2024, Amer Sports made significant strides in further aligning its practices with high standards of social governance.

Amer Sports' Nominating and Corporate Governance Committee oversees its sustainability strategy and initiatives. Amer Sports financial year 2024 ended December 31.

Amer Sports strategy builds on our heritage and on the choices we have made. Our three focus areas are: Winning brands, Consumer first, and Sustainable results. We want to be a positive force in the world and build a sustainability culture that will enable us to think bigger, go further, and be better. Among Amer Sports sustainability strategy that is aligned with the United Nations Sustainable Development Goals (SDGs), we are committed to respecting human rights, promoting fair labor practices and ensuring fair working conditions, and fostering employee engagement, well-being, and diversity.

Amer Sports expresses a zero-tolerance approach to modern slavery, human trafficking, child labor, or any form of forced labor such as bonded, prison, indentured or similar labor, and actively works to prevent adverse human rights impacts in its value chain and improve working conditions. As this statement presents, Amer Sports is committed to acting ethically and with integrity and transparency in all business transactions and implementing effective systems and controls to safeguard against any form of forced labor, modern slavery, or child labor within our business or supply chains.

**“We want to be a positive force in the world and build a sustainability culture that will enable us to think bigger, go further, and be better.”**





## OUR BUSINESS

**W**ith products sold in more than 100 countries, we have a presence in all major markets. Amer Sports' global operations encompass business functions from product development to product sourcing, manufacturing, and logistics. From end to end, our global supply chain ensures the on-time delivery of the products in a global, multi-channel setup. We manage and adapt our distribution and transportation landscape, support the development of our vendor network, and continuously optimize our supply chain processes to support the growth of our brands and the entire group.

In our upstream value chain, our products are manufactured by our qualified suppliers around the world. Approximately one-third of Amer Sports' production value is generated in China, while almost half is generated

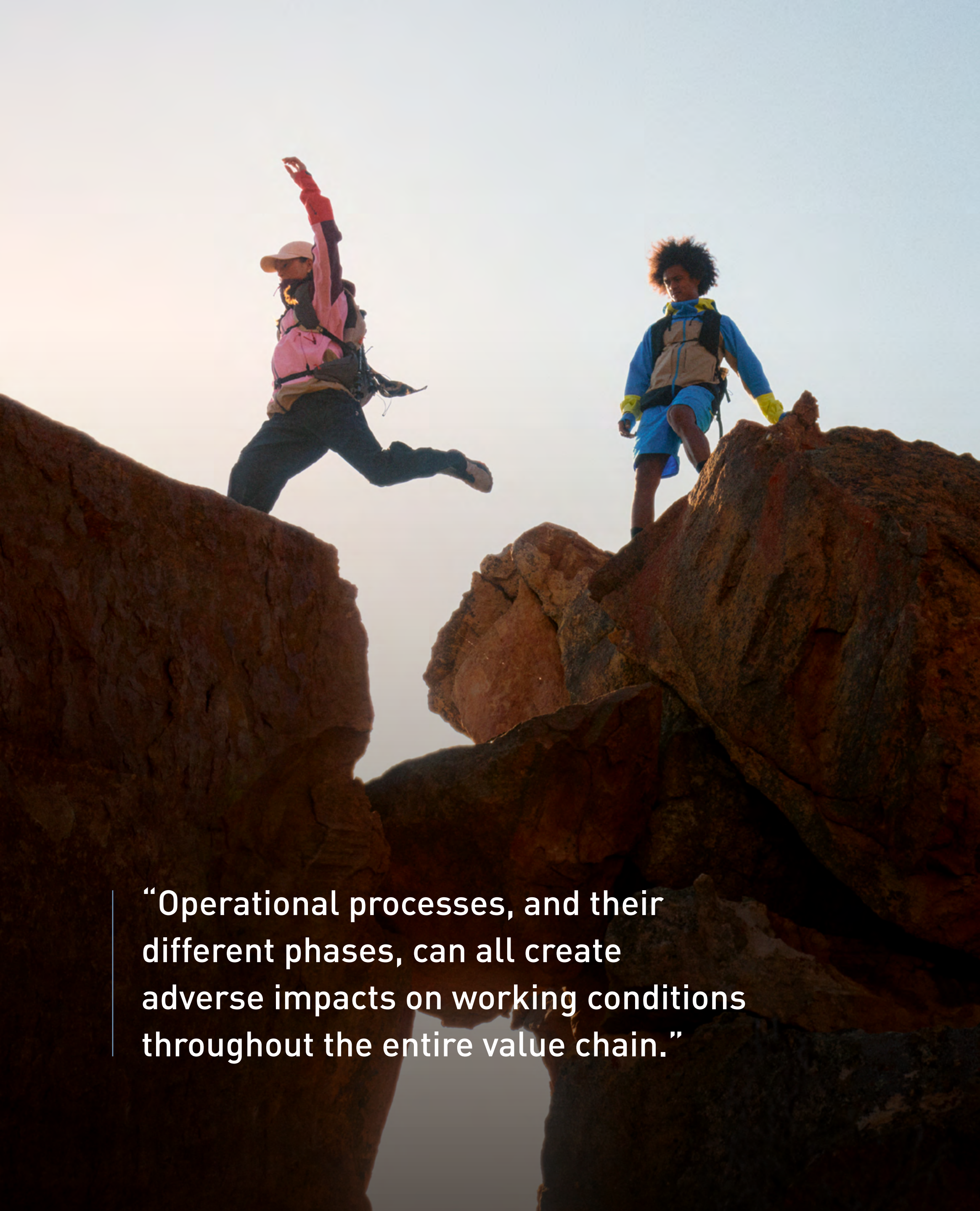
elsewhere in the Asia-Pacific, and the remainder in Europe and the Americas. We manufacture about one-fifth of our products in our own facilities, most of which are in Europe and North America. Our most important own production facilities are in Austria, Bulgaria, Romania, Canada, and the United States. In addition, we have hybrid factories in Eastern Europe, where ownership is shared with local partners.

Our downstream value chain involves distribution of our products through brand stores, e-commerce platforms, and factory outlets, as well as through trade customers in sporting goods chains, specialty retailers, and mass merchants. To fulfill each customer order on time and in full, we leverage a global alliance of suppliers, own manufacturing, distribution centers, and transportation networks.

A close-up, low-angle shot of a person's hands holding a dark brown leather football. The person is wearing a light blue t-shirt with a dark logo. The background is a blurred green field, suggesting an outdoor sports setting.

“With products sold in more than 100 countries, we have presence in all major markets.”





## RISK MANAGEMENT IN RELATION TO ADVERSE IMPACTS

Our global supply chain is a complex network with its operations, supplier partners, and employees in different countries who all work diligently on our products. This creates job opportunities for workers, but also human rights risks that require proactive mitigation and management. Additionally, this exposes us to political, economic, and regulatory risks that demand careful consideration. Operational processes, and their different phases, can all create adverse impacts on working conditions throughout the entire value chain.

To manage the salient country risks, we have implemented third-party audit program including risk assessment metrics for various countries, regions, and industries, covering human rights (e.g., child labor, forced labor, non-discrimination, wages and hours, freedom of association, health and safety), environmental factors (e.g., air quality, carbon intensity, wastewater), and political governance (e.g., corruption, rule of

law, transparency). We annually update these metrics to inform our sourcing decisions, prioritizing due diligence obligations and activities.

### **Amer Sports double materiality assessment (DMA)**

Our own workforce and workers in the value chain were identified as material topics in our double materiality assessment conducted in 2023. This emphasis was driven by potential and actual human rights and labor rights impacts within our suppliers' workforce. These findings were reinforced by a human rights impact assessment (HRIA) conducted in the same year (see below). Emphasizing respect for human rights and labor rights also presents an opportunity to enhance the resilience of our supply chain. Assessment of sustainability risks including own workforce and workers in the value chain, is integrated into our enterprise risk management system, following the double materiality principle.

“Operational processes, and their different phases, can all create adverse impacts on working conditions throughout the entire value chain.”



## Human rights impact assessment (HRIA)

Our human rights impact assessment (HRIA) and gap analysis identified the most salient human rights impacts of Amer Sports, assessed how these impacts are currently managed and determined how to further improve our approach to human rights to prevent and mitigate any risks. The analysis found Amer Sports' social compliance program in this area to be robust with plans for continuous improvement, including tackling some sector-wide issues with our key supplier partners. The HRIA and gap analysis also identified good practices within Amer Sports that will provide opportunities for brands to collaborate and learn from each other. Constant regulatory changes will likely make managing this area more complex and resource-intensive in the years to come.

One of the immediate actions we have taken since conducting the HRIA is to articulate our commitment to human rights across our value chain through a dedicated Human Rights Policy. During 2024, our Human Rights Policy was approved by the Board of Directors.







## EFFECTIVENESS IN ENSURING THAT SLAVERY, HUMAN TRAFFICKING, CHILD LABOUR OR ANY FORM OF FORCED LABOUR IS NOT TAKING PLACE

**O**ur suppliers are managed under a single Global Operations function, which includes integrated and shared platforms of manufacturing, supply chain, and sourcing practices. Vendor Sustainability team of Amer Sports Supply Chain function is responsible for monitoring and controlling labor practices and ensuring they meet the requirements set out in the Amer Sports Supplier Code of conduct (former Ethical Policy). We publish a list of our finished goods suppliers on Amer Sports' website and update this list regularly. The complete list can be read at

[www.amersports.com/sustainability/ethics-and-compliance/supply-chain-transparency](http://www.amersports.com/sustainability/ethics-and-compliance/supply-chain-transparency).

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our sourcing decisions, prioritizing due diligence obligations and activities.

All our activities are aligned with Amer Sports' commitment to human rights, in the spirit of internationally recognized social and ethical standards, including International Labor Organization (ILO) Standards and the United Nations' Universal Declaration of Human Rights. This holds true especially for women, children, and migrant workers. We share this commitment to treat employees with respect and dignity within our entire supply chain.

We monitor and aim to continuously improve the social, environmental, and material compliance of our global suppliers. We engage third-party audits to help sourcing partners comply with industry standards, regulations, and our own expectations regarding health and safety, as well as environmental and social responsibility (see key elements of our audit program below).





## Due diligence: key elements of the Amer Sports audit program

We have a third-party audit program to monitor the fulfilment of our suppliers against the requirements of the Supplier Code of Conduct and Social and Environmental Compliance Benchmarks throughout the entire supplier life cycle. This program aims to ensure that manufacturing facilities do not apply modern slavery practices, human trafficking, child labor or any form of forced labor, that employees (including migrant employees) are properly compensated and treated, and work is performed in a safe working environment without exposure to health hazards. We collaborate with the suppliers for continuous improvements of the program.

We continuously mitigate social and labor risks in our supply chain. Under the audit program, existing and new suppliers of Amer Sports brands, as well as Amer Sports' own manufacturing facilities and owned/third-party distribution centers are audited by a third-party audit company according to the following procedure:

- New suppliers are audited with the aim to ensure that minimum requirements are met, and corrective actions are implemented before sample or bulk orders can be placed. Existing suppliers are subject to regular third-party audits aiming to ensure the suppliers' compliance with

labor regulations, industry standards and health and safety practices in workplaces.

- If improvement opportunities or needs are identified in an audit or via other means, suppliers' factories conduct a root cause analysis and develop a corrective action plan to address the findings. The audit findings are categorized into different risk levels, indicating the priorities of the corrective actions to be taken. Reaudits are required to verify the improvements, depending on the severity of the improvement needs or opportunities.
- In the case of systemic issues, we collaborate with stakeholders—including industry peers—in developing joint capacity-building and improvement programs to support vendors for systematic remediation and continuous improvement. The joint capacity building projects we have conducted in recent years include independent workers' surveys, root cause analyses, and improvements to social compliance management systems.
- Amer Sports Vendor Sustainability team provides training on social and labor standards defined in the Amer Sports Supplier Code of Conduct and audit procedures. Training is conducted during the onboarding process of a new supplier and on a regular basis when any policies and procedures are revised.

We provide details about the key elements in the supply chain audit program, progress of the audits, our targets, and related key findings in our annual Sustainability Report, which can be found at [www.amersports.com/sustainability/reports](http://www.amersports.com/sustainability/reports).

Tracking the performance and progress Amer Sports Vendor Sustainability team regularly monitors public sources and internal reporting channels for any reports related to modern slavery practices in our business and supply chain. We track the effectiveness of implementation of all the actions taken to cease, prevent, and mitigate adverse impacts in our supply chain.

We employ a social labor scoring and grading system to track the performance of our suppliers related to human rights including forced labor, child labor, freedom of association, abuse and harassment, discrimination, compensation, working hours, and health & safety. The scores are part of both strategic vendor development plans and regular monthly performance review cycles adapted by Amer Sports Global Sourcing function. The performance data is also reported to the Amer Sports Executive Board on a quarterly basis during quarterly business reviews.



# BUSINESS CONDUCT, POLICIES AND STANDARDS ADDRESSING FORCED AND CHILD LABOR

**O**ur policies and policy commitments play a crucial role in steering Amer Sports' conduct towards more sustainable practices. These group-wide policies and standards provide guidelines and frameworks that we follow to minimize our negative impact on the environment and society, and target to maximize our positive contribution:

- Code of Conduct
- Human Rights Policy
- Supplier Code of Conduct
- Social and Environmental Compliance Benchmarks
- Living Wage Commitment

In these policies and standards, we have committed to preventing modern slavery, trafficking, child labor or any form of forced labor, and improving working conditions in its value chain. Our policies and standards require that the employment of persons must be voluntary, and it is prohibited to use any forced or involuntary labor, whether prison, bonded, indentured, or otherwise.

In addition to the policies and standards listed above, Amer Sports is a member of the Fair Labor Association (FLA).

All policies are available at [www.amersports.com/sustainability/ethics-and-compliance](https://www.amersports.com/sustainability/ethics-and-compliance).

## Code of Conduct

The Amer Sports Code of Conduct, which is the master policy for all our policies, defines the major principles of the company's business conduct, and outlines and sets the key ethical principles for Amer Sports and its own employees. The Code of Conduct focuses on the promises to consumers, shareholders, and business partners, and refers to ILO Standards and the United Nations' Universal Declaration on Human Rights.

The Code of Conduct describes Amer Sports' commitments and expectations towards all its business partners. Aspects of the Code of Conduct include, for example (not comprehensive list): the environment, human and labor rights, health and safety at work, preventing harassment, diversity,


equity and inclusion (DEI), quality of public disclosures, compliance with laws and competition compliance with laws and competition compliance, fair dealing, anti-money laundering, conflicts of interest, political contributions, doing business with others, trade compliance, data privacy and confidentiality. The Amer Sports Code of Conduct was updated in 2024 and is currently available in 15 languages.

## Human Rights Policy

Amer Sports Human Rights Policy sets out human rights commitments related to all people across our value chain, including Amer Sports' consumers, athletes we sponsor, ambassadors and members of the communities we operate. It provides additional commitments and details on how our human rights work is implemented across Amer Sports and our brands, covering the entire value chain. Among others, Amer Sports Human Rights Policy includes the human rights risks and impacts identified as the most salient, as well as governance and implementation measures. The policy strictly prohibits child labor and forced labor in our value chain.





A photograph of two trail runners on a dirt path in a forest. The runner in the foreground is wearing a blue cap, an orange and green jacket, and orange shoes. The runner behind is wearing a black cap and a black jacket. The path is surrounded by green foliage and trees, with a misty background.

**“We are committed to socially responsible sourcing practices through both our suppliers and self-owned production facilities.”**

As part of our policy, we are committed to providing for or cooperating in the remediation of adverse human rights resulting from our actions or contributions. It applies to all Amer Sports entities worldwide as we are committed to respect human rights as set out in the International Bill of Rights, UN Guiding Principles on Business and Human Rights, the core conventions of ILO, the Declaration of Fundamental Principles and Rights at Work, as well as in accordance with local laws. Through application of the Human Rights Policy, we meet the requirements of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. The policy is owned by the Senior Vice President, Sustainability and approved by the Amer Sports Board of Directors.

### **Supplier Code of Conduct**

We are committed to socially responsible sourcing practices through both our suppliers and self-owned production facilities. The Amer Sports Supplier Code of Conduct, together with the vendor and social compliance monitoring program, sets out the core values of our sourcing operations. We share with our suppliers the commitment to treating employees with respect and dignity by expecting suppliers to adhere to our Supplier Code of Conduct, including local labor laws and regulations relevant to the business. Amer Sports’ Supplier Code of

Conduct is integral part of our contracts with all suppliers who confirm by signing that no part of their business operations contradicts with the requirements of it.

Modern slavery, human trafficking, child labor and forced labor form the key focus areas of Amer Sports Supplier Code of Conduct. Suppliers are regularly audited by third-party auditors commissioned by us to verify the adherence to our Supplier Code of Conduct. Whenever performance gaps are identified in an audit, we work with the suppliers to remediate the issue for the best interest of the workers. We hold the right to terminate the business relationship with a supplier if there is a violation to this or any other critical issue.

The Supplier Code of Conduct, being an integral part of our responsible operations strategy, is fully aligned with the FLA Code of Conduct. It includes provisions on legal compliance, child labor, forced labor, and communication with workers amongst others.

The ethical standards contained in the Supplier Code of Conduct are also used as one of the aspects in selecting and retaining suppliers. The Supplier Code of Conduct requires suppliers to further monitor the ethical performance of their suppliers and contractors and be prepared to take immediate and thorough steps in cases of questionable ethical performance.





The Supplier Code of Conduct was reviewed in 2024, and key updates include strengthened requirements on responsible procurement, traceability and transparency, responsible recruitment, health and safety, and environmental protection. The former name of the policy, the Ethical Policy, was changed to the Supplier Code of Conduct and the revision was approved by Amer Sports Chief Supply Chain Officer at the beginning of 2025. The new Supplier Code of Conduct will be available in 31 languages.

**Social and Environmental Compliance Benchmarks**

Social and Environmental Compliance Benchmarks provide detailed information on how employers comply with the Amer Sports Supplier Code of Conduct, and all applicable national and international laws, rules, regulations, and industry best practices.

**Living Wage Commitment**

We recognize living wage as a basic human right and are committed to progressively striving towards living wages for workers in its finished goods manufacturing. We collaborate closely with our suppliers to ensure that workers are compensated fairly, at minimum meeting the local legal requirements. To address wage gaps, we collect and compare data from our finished goods factories against recognized wage benchmarks.

We engage with our suppliers, governments, civil society organizations, and unions to foster dialogue and collaboration, driving continuous improvements in our compensation practices. Amer Sports Living Wage Commitment was approved by Amer Sports Chief Operating Officer in 2024.

**Membership in the Fair Labor Association (FLA)**

We have been a member of the internationally recognized FLA as a Participating Company since June 2020. The FLA is a collaborative effort aimed at improving workers’ lives worldwide and creating lasting solutions to combat abusive labor practices. The FLA offers tools and resources to companies, conducts due diligence through independent assessments, and advocates for greater accountability and transparency of companies, manufacturers, factories, and others involved in global supply chains.

Through our FLA membership, we have access to support from the FLA to improve our social and labor program, and our audit methodology is aligned with that of the FLA. Selected Amer Sports’ finished goods’

suppliers are subject to external independent assessments by FLA’s Sustainable Compliance Methodology (SCI) every year.

Membership in the FLA highlights our commitment to upholding human rights in our global supply chain. Recognized as one of the most rigorous social and labor programs in the industry, the FLA plays a crucial role in safeguarding workers’ rights globally, driving long-term improvements through training and education, worker engagement, grievance mechanism, and integration into sourcing practices.

We will continue to review and update the policies and procedures periodically and ensure employees at Amer Sports and its supply chain are protected from mistreatment including child labor, forced labor in any form, and human trafficking.



## TRAINING

**W**e take care of training our own employees and those who work in our supply chains. In addition to the basic classroom trainings, we provide variety of e-learning programs to our employees. The training programs are based on our business conduct and policies.

We provide training to our employees on the essentials of the Code of Conduct. Every Amer Sports employee is responsible for their own behavior, acting with integrity, and observing the highest standards of business ethics. All Amer Sports employees are required to take part in a mandatory Code of Conduct training. The Code of Conduct e-learning program,

**“We implemented a comprehensive Sustainability training program in 2024.”**

which was updated in 2024, is available in 15 languages and addressed to all employees who have a company email address. Each Amer Sports employee must attend the Code of Conduct training (either as e-learning or classroom training) every two years.

The Amer Sports Vendor Sustainability team managing the supply chain audit program is trained on international social standards (e.g., SA8000). The team also provides orientation trainings to procurement/buying teams on responsible purchasing practices and social labor requirements including modern slavery, human trafficking, child labor, or any forms of forced labor topics.

We implemented a comprehensive Sustainability training program in 2024. The aim of the training program is to increase general awareness of sustainability and related specific topics, such as human rights and circular economy. The training program is mandatory for all non-operative employees working in the office roles while being recommended for all Amer Sports employees.







## CHILD LABOR AND FORCED LABOR PREVENTION AND REMEDIATION

**W**e are committed to preventing child labor and forced labor within our supply chain by enforcing rigorous screening and monitoring processes (see also section on the key elements of our audit program). Suppliers are trained to implement robust human resources management system and

hiring practices, including age document verification, to ensure compliance with ethical labor standards. Additionally, private worker interviews are conducted during third-party on-site audits, allowing direct feedback from employees to identify any potential risks of forced labor. If any cases of child labor or forced labor are

identified, Amer Sports implements effective remediation procedures aligned with ILO standards. This includes conducting a root cause analysis to understand the underlying factors and taking corrective actions to eliminate such practices, ensuring a responsible and ethical supply chain.

## GRIEVANCE PROCESS AND EXTERNAL FEEDBACK CHANNEL

**W**e have implemented a grievance handling procedure using multiple anonymous channels to manage grievances from external third-parties or individual workers regarding working conditions. Complaints are analyzed to inform our program improvements and capacity- building training opportunities for suppliers.

We provide direct feedback channels for our suppliers' employees. If there is a violation of any standards of the Supplier Code of Conduct, employees are encouraged to bring issues to our attention by emailing [vsl@amersports.com](mailto:vsl@amersports.com) in English or their native language. To ensure accessibility and understanding, the Supplier Code of Conduct shall be posted on the factory work floors in the language understood by workers. The Supplier Code of Conduct is available in 31

languages at our company's website. We will keep all information strictly confidential, and employees shall be free from retaliation because of issues raised.

We have a whistleblowing channel, which is a confidential and anonymous reporting line operated by an external partner WhistleB, and available to external stakeholders at [www.amersports.com/sustainability/ethics-and-compliance/whistleblowing/](https://www.amersports.com/sustainability/ethics-and-compliance/whistleblowing/).



## CONTINUOUS IMPROVEMENT: IMPORTANT EVENTS IN 2025

**W**e will review our sustainability strategy and update our double materiality assessment (DMA) which defines our key topics for reporting, updates the sustainability strategy, and creates a structure for our sustainability reporting aligned with European Sustainability Reporting Standards (ESRS) requirements.

We will ensure the compliance with evolving sustainability regulations through active monitoring and comprehensive compliance programs, addressing specific regulations such as Corporate Sustainability

Due Diligence Directive (CSDDD). Further, we will focus on building awareness through training programs and communications, particularly in areas such as DEI and health and safety topics.

We will continue raising the bar in our supply chain by providing trainings to our employees and suppliers on the updates of the Supplier Code of Conduct and help people to recognize elements connected to human rights, e.g. child labor, any forms of forced labor, and modern slavery. We will also continue implementing the principles of fair labor and responsible sourcing established by the FLA.







## **Declaration and approval of this statement**

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015, Australia Modern Slavery Act 2018, Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act (Bill S-211), Dutch Child Labour Due Diligence Law 2019, California Transparency in Supply Chain Act (Bill No.657), France Duty of Vigilance Law (Act no. 2017-399), Norway Transparency Act 2022, Mexico Forced Labor Statute 2023 and sets out the measures that Amer Sports and its affiliates (“Amer Sports”) have taken during the 2024 financial year.

This statement was approved by the Board of Amer Sports, Inc. on May 15, 2025.

**James Zheng**  
CEO  
Amer Sports



