

Dick's Sporting Goods

Vendor Code of Conduct

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At Dick's Sporting Goods ("DICK'S SPORTING GOODS"), we believe that adhering to the highest possible standards of integrity and ethical behavior is the only way to succeed, and so we have set the highest standards for the way we conduct business, in areas from corporate and social responsibility to sound business ethics.

This Vendor Code of Conduct ("Code") for vendors, while not exhaustive, is established to provide a guideline of expectations, highlighting some key laws and regulations, as well as outlining minimum requirements that DICK'S SPORTING GOODS expects its vendors to meet. Because we place such a high priority on ethical and legal conduct, we require all of our vendors to read, understand and comply with our Code and all other conditions of doing business with DICK'S SPORTING GOODS. Failure to conduct business in a manner that meets these standards could result in a termination of the vendor relationship with DICK'S SPORTING GOODS. Vendors must take reasonable measures to ensure that its employees act in accordance with this Code.

When we refer to "vendors" in this Code we mean each business enterprise, regardless of its form (such as a corporation or company, partnership, or sole proprietorship) that engages or participates, directly or indirectly, in the sale, consignment, or other provision of goods or services to DICK'S SPORTING GOODS, its affiliates or subsidiaries. "Vendors" includes agents, subcontractors, and other third parties, and vendors cannot avoid the responsibilities and obligations imposed by this Code by using, or associating with, agents, subcontractors, or other third parties. When we refer to "applicable" law in this Code we mean the law, including regulations, judicial decrees, and other governmental actions that have the force of law, in effect at each location where a vendor conducts operations with respect to, or that affect, the vendor's business with DICK'S SPORTING GOODS.

Compliance with Applicable Laws, Regulations and Practices; Social Accountability

All vendors must conduct their business activities in full compliance with the applicable laws while conducting business with and/or on behalf of DICK'S SPORTING GOODS, and must, without limitation (i) comply with all applicable trade controls, as well as all applicable export, re-export, and import laws and regulations; (ii) conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business; (iii) not participate in international boycotts that are not sanctioned by the United States (U.S.) government or applicable laws; (iv) not participate in bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector; (v) not employ anyone under the legal working age or use forced or involuntary prison labor as outlined in our [Human Rights Policy](#); (vi) recognize and respect each employee's right to associate with any legally sanctioned organization; the rights of labor unions must be respected; (vii) not discriminate on the basis of any condition or characteristic as outlined in our [Human Rights Policy](#); and (viii) not use corporal punishment or other forms of physical or sexual harassment or abuse of their employees as outlined in our [Human Rights Policy](#).

DICK'S SPORTING GOODS is committed to observing the standards of conduct set forth in the U.S. Foreign Corrupt Practices Act (the "FCPA") and the anti-corruption and anti-money laundering laws of the countries in which DICK'S SPORTING GOODS operates. Vendors must comply with all applicable anti-corruption and anti-money laundering laws, including the FCPA, as well as laws governing lobbying, gifts

and payments to public officials, political campaign contribution laws, and other related regulations. Vendors must not, directly or indirectly, offer or pay anything of value (including travel, gifts, hospitality expenses, and charitable donations) to any official or employee of any government, government agency, political party, public international organization, or any candidate for political office to (i) improperly influence any act or decision of the official, employee, or candidate for the purpose of promoting the business interests of DICK'S SPORTING GOODS in any respect, or (ii) otherwise improperly promote the business interests of DICK'S SPORTING GOODS in any respect.

Responsible Recruitment

DICK'S SPORTING GOODS expects all vendors to practice responsible recruitment in accordance with local laws and international standards. Specifically for apparel and footwear, DICK'S SPORTING GOODS is committed to the [AAFA/FLA Apparel & Foot Wear Industry Commitment to Responsible Recruitment](#). As such::

- No worker must pay for their job
- Workers must retain control of their travel documents and have full freedom of movement
- All workers must be informed of the basic terms of their employment before leaving home.

Wages, Benefits, and Working Hours

Wages, benefits, and working hours must meet local legal requirements, as outlined in our [Human Rights Policy](#).

Health, Safety and Human Rights

DICK'S SPORTING GOODS respects human rights as defined by our [Human Rights Policy](#) and the [International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#). We want our work environment to be positive, productive, and characterized by respect. Vendors are expected to integrate sound health, safety, human rights and labor rights management practices into all aspects of business, and must, without limitation: (i) provide a safe and hygienic work environment and fully comply with all safety and health laws, regulations, and practices including those applicable to the areas of occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food and housing; (ii) take adequate steps to minimize the causes of hazards inherent in the working environment; (iii) prohibit the use, possession, distribution, or sale of illegal drugs while on DICK'S SPORTING GOODS owned or leased property; and (iv) establish standards in accordance with internationally accepted principles on human rights and labor rights.

Anti-Discrimination

Partners must not unlawfully discriminate in recruitment and employment practices, and all workers must be legally authorized to work to be eligible for employment. See our [Human Rights Policy](#) for specifics.

Environment Regulations and Protection

DICK'S SPORTING GOODS recognizes its social responsibility to protect the environment and expects its vendors to share its commitment by responding to challenges posed by climate change and working towards protecting the environment. As a part of this commitment, all DICK'S SPORTING GOODS vendors must, without limitation: (i) act in an environmentally responsible manner; (ii) comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste and wastewater discharge, including the manufacture, transportation, storage, disposal, and release to the

environment of such materials; (iii) adhere to all applicable laws regarding prohibition or restriction of specific substances, including product content labeling and labeling for recycling and disposal; (iv) and work to minimize vendor's impact on surroundings and global resources.

Monitoring and Record Keeping

Vendors must conduct their business interactions and activities with integrity and must, without limitation, honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy. Vendors must create, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements. Vendors must maintain necessary documentations to demonstrate their compliance with this Code.

Conflicts of Interest

DICK'S SPORTING GOODS employees are required to avoid not only conflicts of interest but also activities that could give the appearance that a vendor has somehow improperly influenced an employee in order to receive favorable treatment. Vendors are required to avoid actions that may result in conflicts of interest, which include offering, providing or reimbursing personal gifts, favors, personal travel expenses, lodging or other housing, services of any kind, excessive meals or entertainment, or any other thing of value to DICK'S SPORTING GOODS employees. Gifts or entertainment with a value of \$100 or more require employees complete a Gifts and Entertainment Receipt Authorization Form along with applicable approvals prior to the receipt of the gift and/or entertainment. Gifts valued under \$100, reasonable meals and/or local sporting events with a vendor or business travel expenses including reasonable meals, airfare or lodging provided by a vendor do not require a completed form. A conflict of interest may occur if we have a bias or a personal interest that interferes with our ability to make an objective business decision. Vendors should avoid any actions or relationships that create, or even appear to create, a conflict of interest.

Confidentiality, Security and Privacy

DICK'S SPORTING GOODS expects its vendors to protect DICK'S SPORTING GOODS confidential information just as carefully as they would protect their own confidential information of like nature. We have policies and procedures in place to protect both physical and electronic information. DICK'S SPORTING GOODS expects its vendors to comply with applicable security and privacy laws, regulations and retention requirements, and to ensure that they have appropriate technical and security controls in place to protect the confidentiality, security, access to and availability of DICK'S SPORTING GOODS confidential information.

Remember, any information vendor personnel create using a DICK'S SPORTING GOODS device (e.g. laptop, desktop, cell phone, tablet, etc.) belongs to DICK'S SPORTING GOODS, not to the vendor or its personnel. DICK'S SPORTING GOODS can review any information (photos, videos, text messages, emails, documents) on a DICK'S SPORTING GOODS device or system at any time. Confidential information means all non-public DICK'S SPORTING GOODS data, including without limitation: projected sales and/or earnings, sales and margin figures and other performance indicators, existing or new products plans, designs or specifications, business plans, retail pricing strategies, marketing plans, vendor relationships, pricing, employee personal information, customer personal information and intellectual property and other information which by its nature would reasonably be expected to be confidential. Vendors may not outsource, disclose, share, or use this information outside the authorizations defined in their contractual or non-disclosure agreement with DICK'S SPORTING GOODS. Unauthorized disclosures could harm DICK'S SPORTING GOODS, breach the vendor contract, or may even be illegal.

Global Security and Trade

DICK'S SPORTING GOODS relies on vendors to ensure that all products sold to DICK'S SPORTING GOODS comply with all applicable laws, including the laws that regulate global trade such as laws governing country of origin, importation, customs entry, export, licensing and sale of imported merchandise. Vendors must ensure that all product markings, labels and documentation are true and accurate and complete and that appropriate records are maintained to validate information provided on all documents.

Unfair Business Practices and Unauthorized Activities

Vendors shall not engage in bid collusion or customer or market allocation with other DICK'S SPORTING GOODS vendors. Vendors shall comply with all applicable antitrust, trade-regulation, and competition laws. Vendors shall not engage in any activity on behalf of DICK'S SPORTING GOODS, including without limitation projects, transactions, political contributions, charitable donations, lobbying, and appearances before government entities, officials, and representatives.

Conflict Minerals

All vendors, including private brand manufacturers of DICK'S SPORTING GOODS, its affiliates and subsidiaries are required to respond timely and accurately to requests regarding conflict mineral usage for products that: (i) include conflict minerals necessary to the functionality or production of the product; or (ii) are contracted to be manufactured by DICK'S SPORTING GOODS. Full transparency and thorough supply chain due diligence to identify mineral smelters, when applicable, is required as part of doing business with DICK'S SPORTING GOODS.

Embracing Change and Technology

At DICK'S SPORTING GOODS, we recognize that changes in technology are constantly enhancing how we interact both with our customers and with our vendors. We expect all of our partners to work with us, to adopt various technology platforms and enable seamless business transactions. This includes the use of eCommerce platforms, B2B systems, e-Invoicing, systems used for the maintenance of electronic records, acceptance of electronic payments, etc.

Innovation and Continuous Improvement

DICK'S SPORTING GOODS values and expects all vendor partners to provide feedback and input into continuous improvement opportunities for the products or services they provide, through your DICK'S SPORTING GOODS contacts. All aspects related to cost reduction opportunities, value-added services and other innovation ideas should be shared on a regular basis with the DICK'S SPORTING GOODS team.

Responding to Audits and Investigations

Our daily business activities include many processes and procedures that are subject to regular inspection and/or audit by government agencies that regulate our business. Inspections and audits can include looking at files and documents, reviewing equipment or entire locations and submitting requests for additional information. Inspectors and auditors visiting your location may perform any of the following: price accuracy testing, fire alarm inspection, hazardous waste process and unit inspection, business license review, review of the location's firearms sales processes and many more testing procedures. We expect vendors to cooperate with auditors and inspectors.

Reporting of Violations

Vendors should always try to do the right thing, even when nobody's looking. If you are unsure about what to do, ask before acting. It is DICK'S SPORTING GOODS's clear expectation that if you become aware of a possible violation of this Code, you will promptly report suspected violations. Vendors may do so anonymously by contacting Dick's Sporting Goods Ethics Hotline at 1-866-814-2749 or via the web at www.compliancehelpline.com/DicksEthicsHotline.jsp. The Ethics Hotline is staffed by an outside company and is available 24/7. Reports to the Ethics Hotline may be made anonymously. We will investigate and react to every report.