

Internal HR Code of Conduct for NIKE

SECTION 1: Introduction and Scope

1.1 Our Purpose

This Internal HR Code of Conduct outlines the ethical, legal, and professional standards expected of all employees and contingent workers (“Teammates”) of NIKE, Inc. and its subsidiaries globally. It serves as a fundamental guide for our daily actions, ensuring that we uphold the integrity and reputation of the NIKE brand. Living up to this Code is a condition of employment.

1.2 Scope and Applicability

This Code applies to all Teammates, regardless of location, position, or tenure. It covers interactions with each other, consumers, partners, suppliers, competitors, and the public. Where local laws or collective bargaining agreements set a higher standard than this Code, the higher standard must be followed.

1.3 Our Core Values: The NIKE Way

Our conduct is grounded in the values that define our culture: Innovation, Sustainability, Diversity & Inclusion, and Ethical Leadership. We are committed to an environment where every Teammate can perform at their best, drive progress, and feel empowered to create the future of sport.

SECTION 2: Ethical Conduct and Integrity

2.1 Compliance with Laws and Policies

Teammates must comply with all applicable local, national, and international laws, as well as all internal NIKE policies and procedures. This includes laws governing consumer protection, competition, privacy, intellectual property, and trade. Ignorance of a law or policy is not an excuse for non-compliance.

2.2 Conflicts of Interest

A conflict of interest exists when a Teammate’s personal interests interfere, or appear to interfere, with the interests of NIKE. Teammates must avoid any activity, investment, or association that could impair their independent judgment or harm NIKE’s reputation.

- **2.2.1 Personal Financial Interests:** Teammates should not have a financial interest in any competitor, supplier, or business partner that could influence their decisions at NIKE, unless the interest is publicly disclosed and insignificant.
- **2.2.2 External Employment/Activities:** Any external employment, consulting, or board service must be disclosed and approved in advance by the Teammate's manager and HR, to ensure it does not conflict with their duties at NIKE.

2.3 Gifts, Hospitality, and Entertainment

Teammates must exercise good judgment and moderation when giving or receiving business gifts, meals, or entertainment.

- **2.3.1 Acceptance of Gifts:** Gifts or hospitality may not be accepted if they could be perceived as an attempt to improperly influence a business decision, violate any law, or violate the 'de minimis' value established by the company.
 - **2.3.2 Travel and Lodging:** Employees may not accept payment for travel or lodging from third parties unless a senior manager provides written approval and the expenditure is deemed necessary and reasonable for a legitimate business purpose.
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SECTION 3: Workplace Environment and Culture

3.1 Equal Opportunity Employment

NIKE is committed to providing equal employment opportunities (EEO) for all Teammates and applicants, without regard to race, color, religion, sex, national origin, age, disability, sexual orientation, gender identity, or any other characteristic protected by law.

3.2 Anti-Harassment and Anti-Discrimination

NIKE prohibits all forms of discrimination and harassment, including sexual harassment. This includes offensive comments, jokes, slurs, physical assaults, or the creation of a hostile work environment. All Teammates have the responsibility to help maintain a respectful, inclusive, and professional workplace.

- **3.2.1 Reporting Harassment:** Any Teammate who feels they have been harassed or discriminated against, or who witnesses such behavior, must immediately report the incident to their manager, Human Resources, or the Ethics & Compliance Hotline.

3.3 Diversity and Inclusion (D&I)

Diversity and Inclusion are central to NIKE's success. We strive to foster a culture where differences are valued, and every Teammate feels they belong, are respected, and can

contribute their unique perspective. Teammates are expected to engage respectfully with colleagues from all backgrounds.

3.4 Workplace Violence

Violence and threats of violence are strictly prohibited. NIKE is committed to providing a secure environment and will take all necessary actions to protect Teammates, including contacting law enforcement when appropriate.

SECTION 4: Health, Safety, and Well-being

4.1 Safe and Healthy Workplace

NIKE is committed to providing a workplace free from recognized hazards and in compliance with all occupational health and safety regulations.

- **4.1.1 Teammate Responsibilities:** Teammates are responsible for following all safety rules and procedures, immediately reporting accidents, injuries, and unsafe conditions to their manager or a safety representative.
- **4.1.2 Emergency Procedures:** Teammates must be familiar with and adhere to all emergency response procedures, including evacuation plans and fire safety protocols.

4.2 Alcohol and Drug-Free Workplace

Teammates must report to work fit to perform their duties. The use, possession, sale, or distribution of illegal drugs, or the abuse of legal drugs or alcohol, on company premises or while conducting company business, is strictly prohibited.

4.2.1 Exceptions: Moderate consumption of alcohol is permissible only at company-sponsored events or business meetings where it is approved by management and appropriate to the occasion.

4.3 Promoting Well-being

NIKE supports the overall well-being of its Teammates through wellness programs and resources. Teammates are encouraged to take advantage of these programs to support their physical and mental health.

SECTION 5: Company Assets and Information Security

5.1 Proper Use of Company Assets

Company assets, including equipment, facilities, vehicles, and information technology systems, are provided for business purposes. While incidental personal use may be permitted, Teammates must protect all assets from loss, theft, damage, and misuse.

- **5.1.1 Intellectual Property:** All intellectual property (IP) created by Teammates within the scope of their employment belongs to NIKE. Teammates must take all necessary steps to protect this IP, including patents, trademarks, and creative designs.

5.2 Confidential Information

Confidential Information includes any non-public information that, if disclosed, could be useful to competitors or harmful to NIKE or its partners. This includes product plans, financial data, Teammate records, and consumer data.

- **5.2.1 Protection:** Teammates must only access and use confidential Information for legitimate business purposes and must not disclose it outside of NIKE, even after employment ends.
- **5.2.2 Data Privacy:** All Teammates must comply with all global data privacy laws and NIKE's internal privacy policies when handling personal data of consumers, Teammates, or business partners.

5.3 Communications and Social Media

Teammates must be mindful that their public communications, including on social media, can reflect on NIKE's brand.

- **5.3.1 Business Communications:** All professional communication must be accurate, truthful, and respectful. Teammates should never misrepresent themselves or the company.
- **5.3.2 Personal Social Media:** While Teammates have personal freedom, they must not use social media to disclose confidential company information, make derogatory comments about the company or its Teammates, or engage in activities that violate this Code.

SECTION 6: Financial Integrity and Reporting

6.1 Accurate Books and Records

NIKE is committed to transparent and accurate financial reporting. All Teammates involved in financial transactions or record-keeping must ensure that all entries are truthful, timely, and comply with Generally Accepted Accounting Principles (GAAP).

6.1.1 Expense Reporting: Expense reports must accurately reflect actual, necessary, and reasonable business expenditures and must be submitted with proper documentation.

- **6.1.2 Internal Controls:** Teammates must follow all internal accounting and financial controls designed to ensure the integrity of our financial data.

6.2 Anti-Bribery and Anti-Corruption

NIKE has a zero-tolerance policy for all forms of bribery and corruption. Teammates must never offer, promise, give, or authorize any money or anything of value, directly or indirectly, to any government official or private party to improperly influence a business outcome.

6.3 Fair Competition¹

We compete vigorously but fairly and ethically. Teammates must comply with all antitrust and competition laws, which prohibit activities such as price-fixing, bid-rigging, and illegal market allocation.

6.4 Whistleblower and Anti-Retaliation Policy¹

NIKE protects Teammates who report concerns in good faith. Any Teammate who raises a concern about a violation of this Code, company policy, or law, will be protected from retaliation, even if the concern is ultimately unfounded.

SECTION 7: Violations and Accountability

7.1 Reporting Violations

Teammates have an obligation to report known or suspected violations of this Code, company policies, or laws.

- **7.1.1 Reporting Channels:** Concerns may be reported to:
 - Immediate Manager
 - Human Resources
 - Legal Department
 - NIKE's Ethics & Compliance Hotline (available 24/7).
- **7.1.2 Confidentiality:** Reports can be made confidentially and, where permitted by law, anonymously.

7.2 Investigation Process

All reports will be promptly and thoroughly investigated with confidentiality and impartiality. Investigators will gather relevant facts, interview witnesses, and maintain appropriate records of the investigation.

7.3 Disciplinary Actions

Violations of this Code will result in disciplinary action up to and including termination of employment, regardless of the Teammate's position. Disciplinary action will be applied consistently and fairly, based on the severity of the violation and the Teammate's past record.

7.4 Policy Acknowledgment

All Teammates are required to read, understand, and acknowledge this Code of Conduct periodically. By acknowledging this Code, Teammates confirm their commitment to upholding these standards.