

				
DocID:	Document Name: Global Human Rights Policy		Document Type: Policy	
Version #: 4	Functional Area: Corporate Compliance	Issued by: Legal	Effective Date: June 30, 2026	Page #: Page 1 of 5

I. Scope:

At DICK’S Sporting Goods (including our affiliates, subsidiaries, and Foot Locker referred to collectively herein as “we”), we have an obligation to conduct business in an honest and ethical manner every day, and that doing so is the only way to succeed. We are committed to respecting internationally recognized human rights standards and avoiding adverse impacts on human rights resulting from our business activities. This commitment is based on our values and the principles set forth in the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights (“UNGPs”), the OECD Guidelines for Multinational Enterprises, and the UN Universal Declaration of Human Rights.

Our Global Human Rights Policy (“this policy”), outlines our human rights procedures and practices as they support our business and govern our relationships with our vertical brand manufacturing partners (“partners”) and teammates. Through adherence to this policy, we prioritize human rights in our daily work, follow the law, and live our values.

This policy is applicable in any country in which we operate. Where local law and the requirements of this policy differ, we will follow the higher standard; where they are in conflict, we will follow national law while doing our best to respect human rights.

II. Purpose:

We are committed to basic human rights as a core component of the way we conduct business. This supports teammates in creating and maintaining a work culture that prohibits unhealthy or unsafe work conditions, forced labor or child labor, and supports the provision of equal human rights for everyone. These include, but are not limited to, the protection of minority groups, the protection of women’s rights, the protection from discrimination based on gender (including gender identity), sexual preference, race or ethnicity, color, religion, regionality or nationality, age, disability, sexual orientation, political beliefs or affiliations, or marital or maternity or parental status, the right to clean fresh water and sanitation, and protections against child or involuntary or forced labor, or corporal punishment.

This policy provides direction and guidance to teammates to ensure that all practices and processes support the fundamental principles of basic human rights and are developed and implemented in a manner that complies with our values around human rights and respects the inherent value of everyone. This policy also helps ensure that teammates engaged in company business understand their responsibility for upholding human rights and equality in the workplace.

This policy applies to all teammates. We also expect all parties who do business on our behalf to also conduct their business in ways that uphold the principles of this policy.

III. Policy Details:

We are committed to maintaining a work environment that respects and supports the provision of basic human rights of all teammates around the world, especially members of at-risk groups including women, young workers, and foreign contract workers, regardless of the country in which they work, to the full extent permitted by law. To this end, we:

- commit to protecting team members from workplace hazards and to providing a safe working environment;
- strictly prohibit forced or compulsory labor, child labor, and human trafficking in any form;
- promote, protect, and help ensure the full and equal enjoyment of human rights for everyone; and
- commit to maintaining a workplace that is free from violence, harassment, intimidation, or other unsafe or disruptive conditions due to internal and external threats and will provide security safeguards for teammates as needed while respecting teammate privacy and dignity.

Our Global Sourcing Guidelines (the “Guidelines”) applies to all suppliers and sets forth our diligence efforts in connection with this policy. In accordance with the Guidelines, we will carry out appropriate human rights due diligence based on the UNGPs to identify, prevent, mitigate and account for how we address any adverse human rights impacts. This process will include:

- taking action to assess actual and potential adverse human rights impacts,
- integrating and acting upon the findings and tracking responses, and
- communicating how adverse human rights impacts are addressed.

We will concentrate our due diligence efforts where we consider the risk to the rights holder to be greatest (referred to as ‘salient human rights’ in the UNGPs), and where we are most able to make a positive difference (referred to ‘leverage’ in the UNGPs). We recognize that human rights due diligence is an ongoing process as human rights risks may change over time as our business operations evolve.

We will not tolerate any behavior or actions that violate this policy.

IV. Specific Requirements/Responsibilities

SUPPLIER RESPONSIBILITIES

We care about the safety and fair treatment of the workers who manufacture the goods we sell, wherever the workers are located. The Global Sourcing Guidelines, Conflict Minerals Policy, and Modern Slavery Report each require our suppliers to respect certain standards consistent with this policy.

We audit our private label suppliers’ factories, both from a social and a security standpoint, particularly in developing countries or places with known human rights risks. We also engage with our suppliers on a regular basis to understand their policies and procedures regarding human rights.

RESPONSIBLE RECRUITMENT

We expect all our vertical brand manufacturing partners and vendors to practice responsible recruitment in accordance with local laws and international standards. Specifically for apparel and footwear, we are committed to the [AAFA/FLA Apparel & Footwear Industry Commitment to Responsible Recruitment](#).

Adherence to this policy requires that:

- 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.

V. Training

To ensure the effectiveness of this policy, we will continue to build the knowledge and understanding of teammates on human rights issues.

VI. Reporting Concerns

Our Code of Business Conduct includes robust policies in furtherance of this policy, including policies preventing harassment and discrimination. We also provide ongoing training to promote a respectful workplace.

If a teammate, vendor, or partner becomes aware of a possible violation of this policy or any of our policies, they have a duty to “speak up” and report their observations in good faith. We prohibit retaliation against anyone reporting a possible violation in good faith.

The Code of Business Conduct includes an Ethics Hotline for reporting concerns as follows:

DICK’s

Telephone: +1 (866) 814-2749

Online: dickssportinggoods.ethicspoint.com

Foot Locker

Telephone: +1 (866) 839-5112 (for the U.S. and Canada)

Online: footlocker.ethicspoint.com (international telephone numbers are available on this site).

The Ethics Hotline is managed via NAVEX and is available 24 hours per day, 7 days per week, in multiple languages.

Wherever local laws permit, concerns directed to the Ethics Hotline can be made anonymously. We will take the appropriate steps to investigate allegations, interview witnesses, resolve inquiries/issues, and identify the records/documents that need to be retained (for legal or operational reasons) related to this policy and applicable retention period.

VII. Record Retention Requirements

All documents related to the compliance and enforcement of this policy shall be maintained for 7 years according to our Corporate Record Retention Schedule or for such period as local laws or specific jurisdictions require.

VIII. Administrative Responsibility

Our Corporate General Counsel and Chief Supply Chain Officer are the Administrators of this policy, and our Board of Directors shall be informed regarding the administration of this policy including any updates, violations, or disciplinary action.

IX. Change Log

Version	Author	Date	Description of Changes
Global Human Rights Policy	Corporate Compliance	June 25, 2026	Please contact Corporate Compliance for previous versions of the Global Human Rights policy.
4.0			Policy updated to fit the new policy format.

If applicable, identify the policies that are replaced/superseded by the new policy here.