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I. Scope

At DICK'S SPORTING GOODS, we believe that 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. DICK'S SPORTING GOODS respects human rights as defined by the [International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#) and the [United Nations Guiding Principles on Business and Human Rights](#). In this policy, we outline our human rights procedures and practices as they support our business and govern our relationships with our private brand manufacturing partners ("Partners") and Teammates. Following this Human Rights Policy helps our Partners and Teammates live DICK'S SPORTING GOODS's value of prioritizing human rights in the work we do every day. It provides principles to ensure we follow the law and will be updated as necessary to reflect our growing and evolving business.

II. Private Brand Manufacturing Partners

a. Policy Details:

DICK'S SPORTING GOODS expects Partners to integrate sound human rights and labor rights management practices into all aspects of business. Partners must, without limitation, establish standards in accordance with internationally-accepted principles on human rights and labor rights.

Local Legal Requirements

DICK'S SPORTING GOODS acknowledges the responsibility of governments to protect and uphold human rights. DICK'S SPORTING GOODS complies with the laws of the countries in which we operate and from which we source products. Further, Partners must comply fully with all applicable regulations and legal requirements relevant to the conduct of their businesses in their country/countries of operations.

Responsible Recruitment

DICK'S SPORTING GOODS expects all of our Private Brand Manufacturing Partners 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.

Forced Labor

Partners must not use forced labor, whether in the form of prison labor, indentured labor, trafficked labor, bonded labor or otherwise. No Partner's employee or subcontractor may be compelled to work through force or intimidation of any form, or as a means of political coercion or as punishment for holding or expressing political views.

Child Labor

Partners must not employ children who are less than 15 years old, or less than the age for completing compulsory education in the country of manufacture, where such age is higher than 15. In the event that child workers are identified at a Partner's location, the following steps must be followed:

1. The child worker must stop working immediately.
2. Under no circumstances can the future safety and/or well-being of the child be put in jeopardy.
3. Where possible, the Partner must contact relevant child protection and law enforcement authorities to ensure the child's safety. The Partner is responsible for all expenses related to the child's cost of transport, accommodation and any other expenses related to reintegration and support. The Partner must maintain all expense records related to the child's return. These records will be reviewed to verify that the Partner has complied with the Remediation Plan provided as part of the Partner's on-boarding and the proper authorities to ensure the child's safety.
4. The Partner must consider re-employment of the child once s/he is 16 years old, or of the legal working age.
5. The Partner must establish a recruitment policy that prevents child workers from future employment in the factory. The Partner must show that the recruitment policy is enforced and that proper age verification systems have been implemented.

Anti-Discrimination

Partners must not discriminate in recruitment or employment practices. Decisions about hiring, salary, benefits, training opportunities, work assignments, advancement, discipline and termination must be based solely on ability to perform the job, rather than on the basis of personal characteristics or beliefs, such as race, color, creed, religion, ancestry, national origin, citizenship, age, sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), physical or mental disability, medical condition, marital status, domestic partnership status, veteran status, military status, gender identity or expression, sexual orientation, genetic characteristics or information, family care or medical leave status. Additionally, Partners must implement effective measures to protect migrant employees against any form of discrimination and to provide appropriate support services that reflect their special status.

Wages & Benefits

Wages must equal or exceed the minimum wage required by law and legally mandated benefits must be provided. In addition to compensation for regular working hours, employees must be compensated for overtime hours at the rate legally required in the country of manufacture or, in those countries where such laws do not exist, at a rate exceeding the regular hourly compensation rate.

Working Hours

Employees and subcontractors of Partners must not be required, except in extraordinary circumstances, to work more than 60 hours per week, including overtime. Employees and subcontractors of Partners must be allowed at least 24 consecutive hours of rest within every seven-day period and must receive paid annual leave.

Freedom of Association

Partners must recognize and respect the right of employees to join and organize associations of their own. They must develop and fully implement mechanisms for resolving industrial disputes, including employee grievances, and ensure effective communication with employees and their representatives.

Disciplinary Practices And Anti-Harassment

Employees of Partners must be treated with respect and dignity. Partners must commit to maintaining a work atmosphere that is free of all forms of inappropriate workplace behavior and unlawful harassment. Harassment includes offensive behavior that interferes with another's work environment or that would create an offensive, intimidating, or hostile work environment. No employee may be subjected to any physical, sexual, psychological or verbal harassment or abuse, or to fines or penalties as a disciplinary measure. Potentially offensive behavior includes unwelcome sexual advances or remarks. It may also include slurs, off-color jokes or disparaging comments about subjects such as race, color, age, disability, national origin, sex, sexual orientation or other protected categories. Keep in mind that the key to determining whether or not a behavior is offensive generally depends on how it is perceived, not how it was intended. People often have different views about what is offensive. The fact that some people may not be offended by certain behavior does not mean that it is acceptable. Partners must publicize and enforce a non-retaliation policy that permits employees to express their concerns about workplace conditions directly to management or to DICK'S SPORTING GOODS without fear of retribution or losing their jobs.

Health & Safety

A safe and hygienic working environment must be provided, and occupational health and safety practices which prevent accidents and injury must be promoted. This includes protection from fire, accidents and toxic substances. Lighting, heating and ventilation systems must be adequate. Employees of Partners must have access at all times to sanitary facilities, which should be adequate and clean. Partners must have health and safety policies which are clearly communicated to employees. Where residential facilities are provided to employees, the same standards apply.

Environmental Requirements

Partners must ensure they are compliant with local and national laws regarding the environment, including all applicable laws and requirements at their facilities and in the communities in which they operate. We expect our Partners to incorporate environmentally responsible practices into their activities that relate to their business with us. Additionally,

Partners must adhere to all applicable laws regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

Compliance & Due Diligence

DICK'S SPORTING GOODS's Responsible Sourcing group is tasked with assessing factory performance in accordance with our Human Rights Policy. Factories who are in-scope may be audited by the Responsible Sourcing group or designated third parties. Annual audits are semi-unannounced and conducted within a negotiated timeframe. Factories are required to respond to non-compliances by addressing immediately or committing to a corrective action plan with defined time constraints. High-risk factories, where threshold or serious issues exist, require continuous follow-up audits every three to six months until issues have been resolved.

Our Responsible Sourcing group is also required to coach and train suppliers on root cause analysis and the implementation of effective management systems for managing social compliance and human rights concerns. Our team operates with a continuous improvement philosophy and our approach is to engage and collaborate with suppliers as this is generally in the best interest of workers, though we always reserve the right to disqualify a supplier if conditions warrant.

III. DICK'S Sporting Goods Teammates

a. Policy Details:

Forced Labor

We do not use forced labor, whether in the form of prison labor, indentured labor, trafficked labor, bonded labor or otherwise. No employee may be compelled to work through force or intimidation of any form, or as a means of political coercion or as punishment for holding or expressing political views.

Child Labor

We do not hire employees who are less than 16 years old.

Anti-Discrimination

We strive to treat our Teammates with integrity and respect at all times. DICK'S SPORTING GOODS is an Equal Employment Opportunity employer and decisions about hiring, salary, benefits, training opportunities, work assignments, advancement, discipline and termination must be based solely on ability to perform the job, rather than on the basis of personal characteristics or beliefs, such as race, color, creed, religion, ancestry, national origin, citizenship, age, sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), physical or mental disability, medical condition, marital status, domestic partnership status, veteran status, military status, gender identity or expression, sexual orientation, genetic characteristics or information, family care, medical leave status and any other category protected under federal, state or local law. Employment decisions will not be based on these characteristics. Violation of this policy will result in discipline, up to and including termination.

Wages, Benefits, and Working Hours

DICK'S SPORTING GOODS complies with all applicable laws and regulations related to compensation. This includes our commitment to pay Teammates for all hours worked and to comply with all applicable laws and regulations relating to compensation, including but not limited to with respect to meal and rest breaks, overtime pay, and minimum-wage requirements. Please refer to our [Corporate Social Responsibility Report](#) for additional details.

Disciplinary Practices

We know that doing the right thing can be difficult, but we don't want Teammates to worry about their employment being adversely affected. DICK'S SPORTING GOODS strictly prohibits retaliation against anyone for honestly reporting a possible violation of this Human Rights Policy.

If a Teammate or any third party becomes aware of a possible violation of this Human Rights Policy, we believe they have a duty to report it, using one of the options outlined in the Reporting & Enforcement section of this policy.

Freedom of Association

DICK'S SPORTING GOODS employees are based in the United States and Hong Kong. We respect the basic rights of workers as protected under law, which include, for example, freedom of association. Further detail on DICK'S SPORTING GOODS's commitment to its employees, including fair treatment in employment, fair time and pay, health and safety, and more, is contained in our Code of Business Conduct and Ethics.

Health & Safety

A safe and hygienic working environment must be provided, and occupational health and safety practices which prevent accidents and injury must be promoted. This includes protection from fire, accidents and toxic substances. Lighting, heating and ventilation systems must be adequate. Teammates must have access at all times to sanitary facilities, which should be adequate and clean. We have health and safety policies which are clearly communicated to Teammates.

Environmental Requirements

We are committed to minimizing our impact on natural resources and to complying with all applicable environmental laws and regulations. For more information, see our 2018 Corporate Social Responsibility Report.

IV. Reporting & Enforcement

It is DICK'S SPORTING GOODS's expectation that all Partners and Teammates promptly report suspected violations of this Human Rights Policy using one of the following reporting methods:

- Teammates can discuss the matter with a manager
- Teammates can raise the matter with his/her departmental Senior Vice President
- Contact Compliance (Compliance@dcsq.com)
- Contact the Teammate's Human Resources Representative
- Call the Ethics Hotline at 1-866-814-2749
- Submit a report to the Ethics Hotline via the internet at:
<https://www.dickssportinggoods.ethicspoint.com>
- Submit a report to the Ethics Hotline via mail at:
 - DICK'S Sporting Goods, Inc.

Attn: Compliance Department
345 Court Street
Coraopolis, PA 15108

NOTE: 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.**

Violations of this Human Rights Policy by our Teammates may result in disciplinary actions, up to and including termination. When necessary, violations of this Human Rights Policy due to serious or persistent poor compliance or lack of transparency and cooperation in our auditing efforts may result in termination of a Partner relationship.

V. **Linked/Related Documents**

[The DICK'S Sporting Goods Code of Business Conduct & Ethics \(for employees\)](#)

[California Transparency in Supply Chains Act](#)

[DICK's Privacy Policy \(for customers\)](#)

VI. **Administrative Responsibility:**

General Counsel and the Chief Human Resources Officer are responsible for the administration and enforcement of the Human Rights Policy. Questions regarding the Policy should be directed to Compliance@dcs.com.

Queries from external organizations or media should be directed to CSR@dcs.com.

DICK'S SPORTING GOODS provides annual training to relevant Teammates and Partners on human rights practices.

VII. **Change Log**

Version	Author	Date	Description of Changes
1.0	J. Rooney	June 1, 2019	N/A
2.0	J. Rooney	June 6, 2020	General updates