Our mission is clear: we want to be the best sports brand in the world. To achieve this, we need to uphold and strengthen our brands’ connection to Fair Play and integrity.

We as your Compliance team are here to enable you to make the right decisions:

■ We promise to provide simple and hands-on guidance for you to live up to the principles stated in our Fair Play Code of Conduct.

■ We are always on hand to advise on the challenging choices you make in our daily business.

■ We are committed to protecting both you and our brands.

In business - as in sport - success is built on collaboration, so please reach out to us whenever you are uncertain of how to handle any situation.

Sincerely,

Kai Schumacher
Chief Compliance Officer

Let me be clear about what integrity means and why it is critical to the success of adidas. Integrity means doing the right thing even when nobody is watching and having the courage to make the right decision regardless of the consequences. It is important because, while the reputation of the company and our brands has been built over decades, it is something that can be easily lost by a few unwise decisions.

adidas stands for building better communities by encouraging tolerance, solidarity and fair play in sport. Sport is in our company’s DNA and playing fair holds equally true for sport as it does in business. We believe in hard work, discipline and preparation. We believe in making the right decisions. We do not believe in cutting corners or even associating ourselves with those who do.

The Fair Play Code of Conduct describes how to put integrity into practice every day and how to live up to our values. It is here to guide me and you about the commitments and expectations of adidas.

Please take some time to understand the contents of Fair Play and, if you have any questions, then contact your Local Compliance Officer or the adidas Chief Compliance Officer. And – remember – every employee at adidas is responsible for compliance, starting with me. I personally will do everything it takes to bring our values to life and I expect the same of you.

Exhibit courage and be sure to act in a way that drives adidas’ reputation well into the future!

Kasper Rorsted
Chief Executive Officer

Our mission is clear: we want to be the best sports brand in the world. To achieve this, we need to uphold and strengthen our brands’ connection to Fair Play and integrity.

We as your Compliance team are here to enable you to make the right decisions:

■ We promise to provide simple and hands-on guidance for you to live up to the principles stated in our Fair Play Code of Conduct.

■ We are always on hand to advise on the challenging choices you make in our daily business.

■ We are committed to protecting both you and our brands.

In business - as in sport - success is built on collaboration, so please reach out to us whenever you are uncertain of how to handle any situation.

Sincerely,

Kai Schumacher
Chief Compliance Officer
CONTENTS

ADMINISTERING OUR CODE ........................................................................... 3-15
Why You Need To Know the Code ................................................................. 4
Who Is Behind the Code? ............................................................................. 8
Prevent! ........................................................................................................... 12
Detect! ............................................................................................................. 13
Respond! ......................................................................................................... 14

INTEGRITY IN OUR BUSINESS ACTIVITIES ........................................ 16-41
Focus on Consumers .................................................................................... 18
Bribery and Corruption .............................................................................. 20
Gifts, Travel and Entertainment .................................................................. 24
Dealing with Suppliers ................................................................................ 28
Conflicts of Interest ...................................................................................... 30
Competition and Antitrust .......................................................................... 32
Improper Market Influence, Marketing and Advertising ......................... 36
Insider Trading ............................................................................................. 38

WORKING RELATIONSHIPS AND WORKSPACES ............................ 42-51
Treating Each Other with Respect ............................................................... 44
Working In a Safe Environment .................................................................. 46
Product Safety and Quality ........................................................................ 48
Privacy and Data Protection ........................................................................ 50

OUR SOCIETY AND THE ENVIRONMENT .............................................. 52-63
Government Affairs ..................................................................................... 54
Corporate Communication ......................................................................... 58
Environmental Requirements ..................................................................... 62

RESOURCES, RECORDS AND INFORMATION MANAGEMENT ........ 64-75
Can You Keep a Secret? ............................................................................. 66
Information Technology and Communications Systems .......................... 70
Company Funds: Maintaining Accurate Records ....................................... 72

What to do ...................................................................................................... 76
How To Report a Compliance Violation ...................................................... 78
WHY YOU NEED TO KNOW THE CODE
WE WANT OUR PARTNERS TO BE PROUD OF THEIR ASSOCIATION WITH ADIDAS

OUR UNWAVERING COMMITMENT TO INTEGRITY IS THE FOUNDATION TO THOSE RELATIONSHIPS

In a changing world, a fast-paced industry and with uncertain economic times, it is important for us to look sometimes at the broader game plan and to remain focused on what we agree is most critical to us.

Our values of passion, performance, integrity and diversity help us to do this. They encompass the fundamental principles that guide the way we think and act. They are what adidas stands for and what we are about. Our values connect us as a team.

This Code of Conduct expresses those values alongside other information, guidance and additional resources in order to allow you to understand how ethical and compliant decision-making is essential at adidas.

In this Code of Conduct you will be introduced to scenarios and situations that employees may have already encountered. Please take these experiences on board, apply them to your everyday roles and communicate our commitment to integrity to those around you.

Remember, only when we live our values, follow laws and regulations and pull together as a team can we achieve our mission to be the leader in the sporting goods industry.

What if something is not covered in the Code of Conduct?

The Code of Conduct cannot address all of the ethical issues that can arise in the course of the company’s business. It is your responsibility to be aware of adidas policies and procedures, including those contained in the Global Policy Manual and to apply high ethical standards to all of our work, even where no policy or direct guidance exists. You are always expected to apply common sense.
WHO IS BEHIND THE CODE?

Who has issued this Code of Conduct?
The Executive Board members of adidas are responsible for approving and issuing this Code of Conduct. This Code of Conduct is effective as of 1 October 2014.

How is this Code of Conduct reviewed or amended?
This Code of Conduct is periodically reviewed by Global Legal to determine whether revisions may be required due to changes in the law or regulations or changes in our business or the business environment. The Chief Compliance Officer and the Executive Board must approve any changes to this Code of Conduct.

To whom does this Code of Conduct apply?
All employees, managers, officers and Executive Board members of adidas and its affiliates are obligated to live up to the high expectations that we set ourselves in the Code of Conduct. Additional emphasis is placed upon managers of all levels who are entrusted to ensure that their direct reports receive appropriate ethical guidance and support.

Is any acknowledgement required?
All employees, including our officers and Executive Board members, are required to acknowledge that they have read and understand our Code. They must also certify their compliance with our Code and disclose any potential conflict of interest or any other possible exception to compliance with the Code. In no circumstance does your failure to read our Code or complete Fair Play training, sign an acknowledgement or certify your compliance exempt you from the obligation to comply with the Code.

What happens in the case of compliance violations?
Any failure to prevent a breach of this Code of Conduct and any supporting policies, including those set out in the Global Policy Manual, is serious and could expose the company or individual employees to fines, penalties and criminal liability. Depending upon the circumstances of any breach, the response from adidas may include [where permitted by law]: re-training, a downgraded performance evaluation or other employment consequences, including disciplinary action up to and including termination of employment.

This applies equally to compliance violations that occur as a result of:
- Failing to complete a required certification process
- Requesting or permitting others to violate the Code of Conduct, laws or regulations or company policies, including via third parties such as agents or brokers
- Failing to promptly report a known or suspected violation of the Code of Conduct
- Failing to cooperate with the company’s investigations or audits
- Retaliating against another employee or third party for reporting a suspected violation of the Code of Conduct or company policies or for cooperating with an investigation.

How are compliance violations investigated?
We take all reports of compliance violations seriously and they will be promptly reviewed. Those conducting investigations will:
- Act objectively in determining facts through interviews and reviewing documents
- Contact employees who may have knowledge about any alleged incident
- Recommend corrective actions and/or disciplinary measures where appropriate.
In accordance with applicable law, adidas strives to:

- Protect the confidentiality of the individuals involved, to the extent practical
- Inform an employee of the accusations reported against him/her at a time when such a disclosure will not jeopardise the investigation
- Where permissible, allow employees to review and correct information reported
- Encourage employees to cooperate fully with any inquiry or investigation.

For further information, please also refer to the Fair Play App on the intranet.

Is the Code of Conduct a contract?
Our Code is not a contract. It does not convey any specific employment rights or guarantee employment for any specific period of time.

Coach yourself and coach your team!
Every manager bears a special personal responsibility for the employees entrusted to them.

adidas expects managers to take the initiative to train and be trained appropriately, including upon the assumption of new or expanded leadership duties.

The following shall apply in particular. Managers must:

- Demonstrate ethical leadership through their words and actions (duty of ethical leadership)
- Carefully select employees not only on the basis of their professional qualifications but also their personal character. The duty of care increases with the importance of the task to be entrusted to the employee (duty of selection)
- Formulate tasks in a precise, complete and binding manner; in particular, managers must emphasise compliance with the law and this Code of Conduct when instructing employees (duty of instruction)
- Ensure that compliance with this Code of Conduct and with the law is monitored on a constant basis (duty of monitoring). Delegation of tasks does not release any manager from responsibility
- Clearly communicate that violations of the Code of Conduct or violations of the law are disapproved of and that employees who violate this Code of Conduct or the law while carrying out adidas business may be subject to disciplinary action up to and including termination without consideration of their standing (duty to inform).

I observed some conduct which I think violates the Code of Conduct. I think that I should report it but I am nervous about what will happen to me if I do so. Is it true that I could be punished for making a report?

No. Retaliation is not tolerated and the company takes decisive steps to protect its employees from any retaliation. While the specific steps depend upon each case, these will include careful investigation, reminders about our Global Non-Retaliation Policy and ongoing monitoring. If you feel uncomfortable, then you should consider making a confidential report to our independent and external Fair Play Hotline.
PREVENT!

ACTING WITH INTEGRITY IS ABOUT MAKING THE RIGHT DECISIONS, EVEN WHEN NOBODY IS LOOKING

Many decisions are routine but sometimes we might witness a situation where making the right decision may be difficult. To help you get it right, test, test and test again by taking a moment to ask yourself five simple questions:

What am I being asked to do?
- Find out exactly.

Is it legal?
- You don’t have to be a legal expert, but you do have to know when to ask.

Is it consistent with the company’s commitment to integrity?
- Understand the difference between what the company is entitled to do and what is right to do.

Would my family and friends be happy about my choice?
- If not, it’s probably the wrong thing to do and could be illegal or damaging to our reputation.

What is my instinct telling me?
- If you are uncomfortable, seek advice.

Does adidas really expect to hold itself and all employees accountable to our core values and to the other standards in this Code of Conduct even if that could mean losing business opportunities or reducing our profitability?

Yes, our reputation is key to qualitative and sustainable growth. It is too important for us to throw away on short-term gain. adidas not only monitors immediate financial performance but also how business decisions are made. When employees make the right choices, we recognise this!

THESE ‘RED CARDS’ SHOULD BE A WARNING THAT IT IS TIME TO STOP AND SEEK ADVICE

«Nothing can go wrong.»
«The company owes me anyway.»
«It’s the culture here.»
«No one will notice.»
«We’ve got to make our targets, so don’t worry about it now.»
«It’s not my job – someone else will deal with it.»
«We do not have the budget or time to fix it.»
«In our industry, that’s the way we do it.»
OUR RESPONSE SHOULD BUILD TRUST AND CONFIDENCE IN ADIDAS

It is the duty of every employee to prevent the breach of this Code and it is the additional responsibility of all managers to prevent breaches by their reports.

Where breaches are detected, employees are expected, where permitted by law, to report details of those breaches to their Line Manager, Compliance Officer or HR Manager, without delay.

While we work hard to identify, incentivise and reward those who do the right thing, we also take the necessary action, including notifying relevant breaches to the authorities and invoking employment consequences against those who reject our values, allow breaches of this Code of Conduct or engage in other unacceptable conduct.

Where breaches occur, improvements shall be openly discussed and implemented, rather than buried or hidden.

I don’t speak English. Can I call the Fair Play hotline?

The company has selected an external provider that offers this service in multiple languages.
INTEGRITY IN OUR BUSINESS ACTIVITIES

FAIR PLAY  COMPLIANCE  COMPLETE
COHERENCE  CHARACTER  VALUES
PROMISE  TRUSTWORTHY  GENUINE
SOLID  SACRIFICE  INCORRUPTIBLE
CONSEQUENT  SINCERE  CONDUCT
SECURE  COHESION  COOPERATION
UNITY  PURE  COMPETENCE  FAITH
NON-POLITICAL  SERVICE  MORALS
LEADERSHIP  QUESTIONS  COURAGE
COMPASSIONATE  JUSTICE  ETHICS
VIRTUE  TRUTH  FAITH  CONSISTENCY
Our value of 'passion' reflects our desire to strengthen our consumer relationships by distinguishing ourselves from our competitors. All employees, including those who are not in consumer-facing roles, have the ability to influence the way in which we are perceived by our consumers. We need to ensure that we conduct ourselves in a way that enhances our reputation.

We strive to do this with our consumers by:

**BEING OPEN AND HONEST**

**KEEPING OUR COMMITMENTS**

**ACTING WITH INTEGRITY AND**

**BEING ACCOUNTABLE**

**SEEKING NOT ONLY TO MEET BUT TO EXCEED THEIR EXPECTATIONS**
We believe our products and services can compete on their own merits. We do not offer, make or authorise others to make any payments or give anything of value in order to influence someone in government or business to give us an improper commercial advantage. This applies irrespective of location or culture. Everyone connected with adidas must comply with applicable anti-bribery and corruption laws.

What are bribery and corruption?
Corruption is any abuse of public power, office or resources for personal gain, including by making threats. Bribery is the giving of something of value, for example money, gifts or hospitality, in order to alter the recipient’s behaviour to gain an improper advantage or cause a wrongful loss to others.
I work in Logistics. I know why our company publicly rejects bribery but the reality is that without these payments we would not be able to do business in some countries, for example when it comes to customs clearances. What management really means to say here is 'don’t get caught', right?

Wrong. Corrupt officials target the companies that pay bribes and not companies whose conduct reflects a strong ethical culture. Notwithstanding this fact, the far greater cost of trying to gain an improper advantage is to our reputation. It’s not acceptable that we have to defend adidas in court to avoid damage caused by not living up to our values.

OUR EXPECTATIONS

- Prevent bribery and corruption and the appearance of wrongdoing by not participating in any form of potentially corrupt behaviour
- Detect inappropriate conduct by knowing where payments or gifts are destined and for what purpose and by appropriately documenting any services to be rendered
- Respond to requests or hints for bribes by rejecting these and reporting such requests to your Compliance Officer.

IT IS NEVER ACCEPTABLE TO

- Use company funds for any purpose that is not fully understood and correctly documented
- Enter into agreements which are not approved by departments or functions according to the policies of adidas
- Try to hide behind consultants or third parties who do not share our commitment not to engage in bribery and corruption. This only contravenes our values and does not relieve us of our responsibilities.

An exception may apply for circumstances involving extortion or coercion. This is any situation where you face a demand for payment and where you genuinely feel that your safety is being threatened. Here, a payment may be made and the company will support you to justify that payment provided that the payment is properly documented and promptly referred to your Compliance Officer for further investigation.

SOME ‘RED FLAGS’ INDICATING POTENTIAL BRIBERY AND CORRUPTION SITUATIONS:

- Countries and regions with a reputation for bribery and corruption.
- Unusually high fees, commissions or gifts, entertainment and hospitality.
- The rejection of anti-bribery and corruption provisions in a contract.
- Demands for up-front payments without legitimate business reasons.
- Requests for a cash payment or payments to offshore bank accounts.
- Business partners who appear under-qualified or understaffed for the required services.
- Improper requests to keep relationships confidential.
- Side letters and verbal agreements that go around written contracts.
- Countries and regions with a reputation for bribery and corruption.
- Unusually high fees, commissions or gifts, entertainment and hospitality.
- The rejection of anti-bribery and corruption provisions in a contract.
- Demands for up-front payments without legitimate business reasons.
- Requests for a cash payment or payments to offshore bank accounts.
- Business partners who appear under-qualified or understaffed for the required services.
- Improper requests to keep relationships confidential.
- Side letters and verbal agreements that go around written contracts.
In many cultures, gifts, travel and entertainment are important to developing and enhancing business relationships. However, some gifts and entertainment can improperly influence, or appear to improperly influence, the decision-making ability of the recipient. This could lead to a potential conflict of interest. Ask yourself if the gift or entertainment is excessive and whether it comes with obligations. If you cannot justify it to yourself, then seek advice.

OUR EXPECTATIONS

- Prevent unethical conduct by supplying and receiving gifts or hospitality in an open and transparent way
- Detect inappropriate conduct by reporting gifts, travel or entertainment that is offered or supplied in situations which are inconsistent with the status and seniority of the recipient
- Respond to inappropriate gifts, travel or entertainment by declining these or contacting your Compliance Officer for further guidance.

IT IS NEVER ACCEPTABLE TO OFFER, SUPPLY OR RECEIVE GIFTS THAT

- Are made in cash or a cash equivalent
- Could be interpreted as a bribe
- Violate local laws, regulations or policies applicable to the other person or party
- Create expectations beyond those associated with the normal development and enhancement of existing business relations.

If you are unsure about whether a gift is acceptable, you must consult with your manager or your Compliance Officer before the gift or entertainment is accepted or supplied.

I’ve been given a watch as a gift from one of our potential suppliers. Can I keep it?

This is a personal gift. Ask yourself some simple questions. Why would a potential supplier offer me this gift? Would you be able or willing to personally reciprocate with a gift of similar value? If the answer reveals an ulterior motive or if you would not normally reciprocate, it is most likely a gift that cannot be accepted and should be politely declined. If declining the gift would create an unacceptable level of offence, for example for cultural reasons, then contact your local Compliance Officer for further options.
Our company sponsors many well-known sporting events, so it is inevitable that we will occasionally receive requests for attendance at events or even be offered similar hospitality by vendors as an inducement to engage in business with them. We need to carefully manage such offers and requests because if travel and entertainment is excessive, unreasonable or does not have a clear and valid business purpose, then it most likely violates the law.

adidas will ordinarily not pay any expenses relating to travel, accommodation and meals for government officials to attend site visits, including factory visits. Approval from a Compliance Officer must be obtained in advance.

IT IS NEVER ACCEPTABLE TO OFFER, SUPPLY OR RECEIVE TRAVEL AND ENTERTAINMENT THAT IS:

- Not related to a legitimate business purpose
- Could be interpreted as a bribe, including where the travel and entertainment is hosted at a location not relevant to a business purpose
- Includes travel for friends or family
- In violation of local laws, regulations or policies applicable to the other person or party.

I’ve been contacted by an inspector from a government authority in one of our markets. He wants to meet to discuss the operation of our factories in China. He suggested a meeting location that is in the United States, after which he will stay for a couple of weeks with his family. We are expected to pay his travel and expenses. Is that okay?

No. This sounds like a suspicious request. In limited circumstances the company can pay the travel and expenses of a third party. This request also appears to include travel for family members, is for an extended duration beyond normal meeting times and is to a location that does not appear relevant to the meeting’s purpose. In those circumstances, we would be unable to fulfill such a request.

One of my vendors asked me to attend and speak at an event in the Caribbean that the vendor is sponsoring and has offered to pay all of my travel and entertainment expenses. Can I accept this offer?

Promoting another company’s products is not usually in our best interests and, in some cases, this could be seen as a bribe. Therefore, the circumstances of this offer will need to be reviewed and approved in advance. You must contact your Compliance Officer before accepting this invitation.

For more information about dealing with travel and entertainment, please consult the adidas Global Travel & Entertainment Policy.

I’ve been contacted by an inspector from a government authority in one of our markets. He wants to meet to discuss the operation of our factories in China. He suggested a meeting location that is in the United States, after which he will stay for a couple of weeks with his family. We are expected to pay his travel and expenses. Is that okay?

No. This sounds like a suspicious request. In limited circumstances the company can pay the travel and expenses of a third party. This request also appears to include travel for family members, is for an extended duration beyond normal meeting times and is to a location that does not appear relevant to the meeting’s purpose. In those circumstances, we would be unable to fulfill such a request.

One of my vendors asked me to attend and speak at an event in the Caribbean that the vendor is sponsoring and has offered to pay all of my travel and entertainment expenses. Can I accept this offer?

Promoting another company’s products is not usually in our best interests and, in some cases, this could be seen as a bribe. Therefore, the circumstances of this offer will need to be reviewed and approved in advance. You must contact your Compliance Officer before accepting this invitation.

For more information about dealing with travel and entertainment, please consult the adidas Global Travel & Entertainment Policy.
Dealing with Suppliers

All interactions with suppliers must meet our high ethical standards

We aim for relationships that are fair and pursue mutual value which means only fostering relationships that meet the same high standards of integrity to which we hold ourselves. If your role involves dealing with suppliers, then you should treat them with integrity and professionalism. This includes working openly and honestly.

**OUR EXPECTATIONS**

- Engage in an objective selection process that is in accordance with the company’s procurement policies
- Detect any disputes early and work openly and honestly to collaboratively resolve these through regular communication
- Respond to suppliers by sharing details about our values and this Code of Conduct with them.

**Selection of suppliers**

Suppliers should be selected only where they clearly add value to our company. To guarantee this happens, you must define the requirements for each supplier and impartially select those who best meet adidas’ business needs, basing your decision on objective criteria such as quality, price, service, reliability, availability, technical excellence and delivery.

**IT IS NEVER ACCEPTABLE TO ALLOW YOUR CHOICE OF SUPPLIER TO BE TAINTED OR APPEAR TO BE TAINTED BY**

- Any conflict of interest or the appearance of such (for example: other personal or business relationships)
- Unethical conduct, including improper influence
- Unclear or non-transparent dealings, for example any agreement or side agreement that has not been properly recorded or approved by the relevant department or function as required by adidas policies.

I have multiple suppliers competing for a contract and I want to get the best offer for the company. Can I inform the suppliers of their competitors’ bids in order to speed up this process?

No. There is a requirement that the information of our suppliers, including their financial data, pricing strategies, contract terms, technical data, proprietary processes and software or details of pending negotiations remains confidential. While speaking in broad generalities is usually okay, it is not okay to disclose a specific type of information.

For more information about non-trade procurement processes, templates and general information about the selection of suppliers, please consult with the adidas Procurement Department. In the case of sourcing enquiries, please consult with Global Operations.
CONFLICTS OF INTEREST

Our decision-making on the company’s behalf must be sound, impartial and objective. While having a conflict of interest is not misconduct, the way you handle it could be. We must not allow our judgement to be influenced by what best serves our own personal interests or those of a third party, since those interests may be contrary to what is best for adidas.

What is a conflict of interest?
A conflict of interest is any situation where we find that our personal interests conflict with the interests of the company.

What is a close personal relationship?
A relationship that could be perceived to undermine your professional independence or impair your judgement. Such relationships will normally include those with relatives, household members and current or former romantic partners.

Personal conflicts of interest
In order to avoid a conflict of interest or the appearance of a conflict of interest, you should not participate in the selection process for, or supervise the company’s relationship with a company doing business with adidas if it employs someone with whom you have a close personal relationship. This also includes supervising anyone with whom you have a close personal relationship.

If you enter into any of the above relationships, then you must consider whether this gives any appearance of a conflict of interest and take the appropriate course of action.

My manager has asked me to review bids from several design agencies for an upcoming campaign. I noticed that one of the lowest bids is from a friend of mine who does some really good work. What should I do?

You should inform your manager of the relationship. Give your manager your unbiased feedback and then remove yourself from the decision-making process in order to avoid any actual or perceived conflict of interest.

Financial conflicts of interest
You must disclose any significant financial conflicts of interest that you have in any company that competes, does business or seeks to do business with adidas.

I own a few shares in a major listed competitor. I’ve held them for some time. The company is very large and I have only a very small number of their shares, far less than 1%. Must I anyway sell them?

No. A small stake in a competing listed company is not a violation of this Code of Conduct, provided that you do not buy or sell shares in such companies based on material, non-public information.

Outside employment
Employees must not engage in activities, including employment activities, outside adidas in positions that could conflict or appear to conflict with their responsibilities as an adidas employee. Approvals for outside engagement can be granted by your Compliance Officer in consultation with your manager and Human Resources. Situations where approval might be given include small venture, service within a not-for-profit organisation, charity or family company. Accepting employment with the company’s competitors, customers or suppliers, or providing them with services or products on a self-employed basis, is likely to create a conflict of interest and is not permitted.

I would like to make some extra money by running my own Internet business from home. Is that permitted?
It could be, provided that it does not compete or do business with adidas, use adidas equipment, services or resources, or interfere with your ability to do your job at our company.

The Interests of Adidas Need to Come Before Our Own Personal Interests
COMPETITION AND ANTITRUST

Sacrificing our company’s reputation and commitment to integrity for an unfair commercial advantage is the worst deal we could make.

The risks associated with breaching competition or antitrust laws are severe and include substantial fines that could be greater than 10% of adidas’ total annual turnover and possible imprisonment for individual employees.

While competition and antitrust laws can be difficult to understand, your conduct must be straightforward. If in doubt, ask your Compliance Officer for guidance.
Dealing with competitors
We will never enter into formal or informal agreements with competitors that limit trade or exclude other competitors from the marketplace.

OUR EXPECTATIONS

- Prevent questionable conduct by being cautious about how you interact and communicate with our competitors (including any indirect means of communication such as informal or ‘off-the-record’ conversations)
- Detect possible competition and antitrust issues early and remove yourself from difficult situations by leaving meetings or activities that involve any inappropriate communications
- Respond to inappropriate conduct by reporting any invitations from competitors to share our competitive information to your Compliance Officer.

IT IS NEVER ACCEPTABLE TO

- Make any agreement with a competitor about prices
- Share confidential commercial information with competitors, including, amongst others, price, sales, marketing, cost, research & development or supplier terms
- Make any agreement with a competitor about the quantity or type of products we will sell or produce
- Agree with a competitor to share or divide markets or communicate with competitors about the markets in which our competitors or adidas are focusing
- Agree with competitors not to deal with another person or business.

A major retailer is selling our product at a heavily discounted rate. I am concerned that this might negatively affect our product brand image. Can I request that the retailer does not sell below a set price?

No. While you may be able to recommend a retail price, you cannot try to set or fix the retail price for our products in stores. This is a major breach of competition laws and could result in very serious penalties or imprisonment.

I regularly attend a trade association conference where I meet our competitors. A manager from a well-known competitor is frequently interested in steering our conversation towards discussing our pricing models. She suggests that we could exchange this information for informational purposes. Is this acceptable and what should I do?

No. Exchanging price information could constitute an attempt to fix prices. You must be vigilant about the information we discuss with our competitors’ representatives. You should politely leave any discussions with a competitor that involve these sensitive topics.

OUR EXPECTATIONS FOR WHEN YOU ATTEND A TRADE SHOW, CONFERENCE OR EVENT

- Prevent unwelcome allegations by always wearing a name badge and identifying your customer affiliation to adidas and not entering any areas without the appropriate clearance
- Detect any attempts to obtain information through deceit, including any deviations from agendas or timetables
- Respond by removing yourself from situations that contravene this guidance and report those situations to your Compliance Officer.
HOW WE DO BUSINESS IS EQUALLY AS IMPORTANT AS WHAT WE DO

IMPROPER MARKET INFLUENCE, MARKETING & ADVERTISING

Our company and our products have always proven themselves to be successful on their own merits and we must avoid conduct or statements in relation to our competitors that violate the spirit of fair competition. This extends to the way we compare our products to those of our competitors.

IT IS NEVER ACCEPTABLE TO
- Make false statements about our products
- Make false or prohibited comparisons or statements about our competitors’ products
- Use the intellectual property of others without the appropriate permissions or licences
- Induce suppliers, customers, athletes, clubs, federations, etc., to breach any contract that they have with our competitors
- Take advantage of anyone, including competitors, through unfair dealing, such as manipulating information, making false representations or otherwise failing to act with integrity.

Gathering competitive information
We live in an information age. Information is very important to the success of adidas but it is also critical to respect our competitors’ intellectual property, trade secrets and confidential information. We do not attempt to acquire information about our competitors by illegal or unethical means.

IT IS NEVER ACCEPTABLE TO
- Ask someone to violate their confidentiality obligations, including any contractors or new employees
- Use gifts, bribes, coercion or misrepresentations to obtain confidential information
- Engage in invasive techniques such as trespass, illegal entry and surveillance, or to engage any other third party or person to do this for us.

We have just hired an employee from one of our competitors. One of his first tasks is to prepare a report and presentation about the competitor’s future plans in the market. Is this okay?

No. We must respect our competitor’s proprietary and confidential information. It is highly likely that your new team member has a confidentiality/non-disclosure agreement with his former employer. Besides the obvious legal risks, it is unacceptable to compromise this employee by placing him in an unacceptable ethical position that compromises his integrity. Unless the information is already in the public domain, then you must not ask or cause the new team member to violate his existing confidentiality obligations.
INSIDER TRADING

WE DO NOT TOLERATE INSIDER TRADING BECAUSE IT COMPROMISES OUR INTEGRITY AND CHEATS OTHER SHAREHOLDERS

A diverse range of institutions and individuals choose to invest in adidas. They expect to invest with the confidence that others are not trading our shares with inside information that is not yet publicly available, otherwise known as insider trading. To allow some to benefit from the trading of our shares with knowledge of non-public information that is material to our company’s share price gravely compromises our integrity and cheats other shareholders. Many countries have strict laws that prohibit the trading of shares on the basis of inside information.

What is ‘inside information’?
While all confidential information about adidas must be protected, inside information is particularly sensitive. Inside information is material non-public information that, if known, could affect a person’s decision about buying or selling adidas shares.

I am working in Sales, we have recently launched a new product and I think it will be very successful. Can I buy shares in adidas or is this inside information?

This information is already public, it is therefore not inside information. Examples of inside information include, amongst other things:
- The company’s plans to acquire or sell a company or business unit
- Information about internal decisions relating to a major change in strategy
- Non-public details of the company’s sales, profits/losses or financial position.

I heard yesterday in a private meeting that adidas will soon be selling a business venture that it owns. I know that my uncle holds shares in adidas and, coincidentally, he told me that he plans to sell these soon. My uncle is not wealthy and I’d hate for him to miss out on some additional profit by selling too quickly. Is it okay for me to suggest to him to wait, provided that I don’t give him the actual reason?

No, you cannot help someone make a profit or avoid a loss on the stock market on the basis of any material non-public information (inside information) you acquire in the course of your duties. Advising your uncle to delay his share trade in this way, even without a reason, is prohibited by our Code of Conduct and insider trading laws. This tip-off is every bit as illegal as engaging in insider trading yourself, and violating this prohibition could result in you and your uncle facing criminal prosecution and imprisonment.
OUR EXPECTATIONS

- Prevent breaches to insider trading laws by proper supervision of your employees. Remember, managers may be personally liable for damages, if an employee violates insider trading rules, and if proper supervision could have prevented such violation.
- Detect possible violations and immediately report these to the company’s Insider Committee.
- Respond to the instructions of the company’s Insider Committee if you are handling potential insider information and ensure that insider-relevant knowledge must be secured under lock and key in such a way that unauthorised persons cannot gain access to it.

IT IS NEVER ACCEPTABLE TO

- Buy or sell the company’s shares for your own benefit or the benefit of another person by using knowledge of inside information.
- Buy or sell the company’s shares during any restricted trading periods that apply to you, e.g. the ‘closed periods’ for Executive Board members or specific finance functions.
- Communicate or make available inside information to other persons inside or outside adidas (e.g. journalists, financial analysts, customers, consultants, family members or friends) without authorisation.
- Recommend to another person to buy, hold or sell the company’s shares on the basis of inside information.

For more information about insider trading, please consult the adidas Insider Trading Policy. For any questions about potential insider information, please contact the company’s Insider Committee or your Compliance Officer. More details can also be found in the Global Legal section of the intranet.
WORKING RELATIONSHIPS & WORKSPACES

ETHNICITY THINKING EQUAL EXACT
ESPECIALLY EQUALITY IDENTITY
AGE GENDER TRUE WITHIN WORDS
CULTURE STATE MEAN APPROPRIATE
TALK WELL DIVERSITY THEREFORE
INTEND STATUS QUALIFIERS AWARDS
DIVERSITY ORIENTATION USED ABILITY
EDITION MAKE-UP SHOWING DISTANCE
ORIENTATION ENVIRONMENT RANGE
REFERRING DIFFERENT FAMILY RIGHTS
RIGHT SOCIO-ECONOMIC ENGLISH
We are an equal opportunity employer and choose our team based on talent and not on characteristics such as race, colour, age, gender, disability, sexual orientation, religion or any other basis prohibited by law. Likewise, we do not make any of our working decisions with regard to such characteristics.

We expect everyone to be treated fairly and without being subjected to discrimination or harassment.

Our Expectations

- Prevent unwelcome issues in the workplace by practising adidas values and striving for the 3Cs by creating a nonpolitical working environment where openness and honesty are encouraged, and where collaboration and efficiency are rewarded.

- Detect changes in working environments and encourage your colleagues to discuss any workplace concerns with you.

- Respond to any diversity concerns sensitively but appropriately by addressing issues as soon as they become apparent.

It is never acceptable to

- Harass, degrade or discriminate against others, including denying employment advancement based on any inappropriate factors.

- Make inappropriate gestures, unwanted advances or propositions.

- Make or use derogatory slurs, phrases or jokes or spread hurtful gossip or rumours.

- Behave in a threatening or violent manner to others, including through physical or verbal conduct.

What is Harassment?
Harassment is conduct intended to disturb or upset, and is typically repetitive. For example, sexual harassment is conduct that includes repetitive and unwanted sexual advances. Employees must not engage in such conduct and need to be particularly sensitive to conduct that might be acceptable in some cultures but not in others.

What is Discrimination?
Discrimination is any distinguishing treatment of someone based on their actual or perceived association with a certain group or category. Relevant factors may include race, colour, age, gender, disability, sexual orientation, religion or any other basis prohibited by law.

A colleague recently posted some photos from a company event together with some posts about me on a social networking site. Now I am being laughed about by my colleagues. Do I have to accept this behaviour?

No. You should raise this issue with your colleague and ask him or her to remove the photos. If he or she does not, then you should report this issue to your local Human Resources Department or Compliance Officer. You may also request that your colleagues refrain from making any further jokes about the photos.

For more information, please contact your local Human Resources representative and/or Compliance Officer.
WORKING IN A SAFE ENVIRONMENT

HEALTH AND SAFETY

We do not compromise on the health and safety of our employees, or that of our business partners. We observe all reasonable and legally required precautions to ensure that our workplaces remain safe and secure at all times.

OUR EXPECTATIONS

- Prevent an unsafe workplace by promoting safe and healthy working and by using the safety equipment supplied to you
- Detect any unsafe work conditions and stop work in that area immediately. Do not walk past in the hope that some other person will detect the conditions
- Respond to any unsafe conditions by challenging and reporting what you observe and knowing what to do in an emergency.

IT IS NEVER ACCEPTABLE TO

- Require any other person to work in an environment or under safety conditions that you yourself would not be comfortable with
- Use or work under the influence of alcohol or drugs, which in any way could compromise your own safety and well-being or that of others
- Fail to report a health or safety concern on the assumption that someone else will do so.

A colleague operates machinery in one of the warehouses. His breath often smells like alcohol after lunch. I asked him about this and he says that a couple of beers during the lunch break are not a problem. Should I raise this issue with someone?

Yes. This issue should be addressed immediately. No employees should be working under the influence of alcohol or drugs as it impairs judgement and poses risks. You should raise this issue with Human Resources or your Compliance Officer.

Looking after our workspaces

We all have a responsibility to be proactive in maintaining the safety of facilities and equipment of adidas. This includes treating our equipment with the same degree of care as we would our own personal possessions. Likewise, our facilities and our equipment must be secured appropriately against theft or misuse.

OUR EXPECTATIONS

- Prevent the unauthorised use of company property by being alert to unusual or suspicious activity, including non-compliance with entry and exit procedures
- Detect potential issues by responding to alarms, reporting broken security or fencing systems and asking questions to unfamiliar people not wearing correct identification badges
- Respond to workspace issues by discussing the potential for breaches with your colleagues and manager and planning for relevant scenarios.

Immediately contact the Corporate Property and Services Department or your local Facilities Management team if you have a concern about safety or security at any adidas location.

Company Workplace Standards

For the sake of protecting adidas’ reputation and promoting a strong, dependable supply chain, we expect our suppliers to not only follow the standards set out in this Code but also the company’s Workplace Standards, where applicable.
Our products deliver confidence to consumers. We therefore aim not just to meet but to exceed legal requirements for quality and safety. This applies from the time we purchase the raw materials used in our products through to delivery of products to our markets and consumers.

All those involved in the marketing, design, development, sourcing or distribution of our products are expected to ensure that all procedures are conducted in accordance with adidas’ internal policies and at least meet the standards set by applicable laws or regulations. This includes the preparation and retention of any required documentation.

A retailer has returned some footwear products because they allegedly caused injuries to their consumers. My manager says that this is just an attempt to recoup the value of goods they cannot sell. I am not sure. It could be a genuine safety issue. Is this a concern?

Yes, suspected safety issues should be reported to the Quality and Technical Services Department and the Product Safety & Compliance team of the Social & Environmental Affairs Department, even where such reports seem insignificant. The company’s reputation for performance rests on meeting consumers’ expectations and all such matters should be investigated, no matter if they might initially appear unfounded.

Further support or advice can be received by contacting the Product Safety & Compliance team of the Social & Environmental Affairs Department.

**OUR EXPECTATIONS**

- Prevent questionable safety actions by complying with all best-practice manufacturing, testing and quality standards.
- Detect product safety and quality issues as early as possible by listening to our stakeholders and reporting their feedback to internal stakeholders.
- Respond to safety experiences by utilising the company’s Product Safety Claim Protocol and by applying lessons learned to improving our product design processes.

Further support or advice can be received by contacting the Product Safety & Compliance team of the Social & Environmental Affairs Department.
Our consumers, employees and stakeholders expect that we will handle the information, including any personal data, that they share with us appropriately, and in accordance with applicable data protection laws. A breach of data protection laws can seriously impact adidas or you personally, by way of fines, loss of reputation or even criminal prosecution.

Adherence to the law and the adidas Privacy Policy is extremely important. Before you collect, store, use, transmit or otherwise process personal data or change any existing processes, you should contact Global Legal.

Global Legal has issued internal handbooks, guidelines and policies which will help you comply with data protection laws and the adidas Privacy Policy. Please check the intranet site of the Data Protection Team or contact them directly for further information and support.

I am not sure I understand the meaning of personal data. Is it possible to better define this term?

Personal data means any information relating to an identified or identifiable individual. This can include: names, addresses, telephone numbers, email addresses, dates of birth, banking information, salaries, evaluations or information such as employee personnel numbers.

My manager has asked me to contact HR in order to get the photos of all employees who work for our function globally. We want to use their ID card photos for our intranet presence. Are we allowed to do so?

The company has taken these photos in order to manage access control, including the creation of employee ID cards. It is not acceptable for adidas to use these photos for reasons that go beyond this purpose without the permission of the employee. The use of the photos will depend on the specific circumstances and you should consult with Global Legal.
OUR SOCIETY AND THE ENVIRONMENT

BRING TO LIFE COURAGE ASPIRATION SACRIFICE INSPIRATIONAL CURIOUS PROMISE TRUSTWORTHY GENUINE EMOTIONS EXCITE ENERGY SPEED ENJOYMENT ENTHUSIASM HEARTBEAT BOOST BELIEVE TEAM SPIRIT PRIDE POWER PASSION DREAM DRIVE JOY DELIGHT INTENSITY DANCE ALIVE JOY FUN LOVE DEDICATION THRILL ZEST ENTHUSIASM SUPPORTERS FOR HEARTBEAT SPORT GUTS INTEREST
An active, inclusive and fair political process promotes healthy and productive societies and, ultimately, new markets for our products. We encourage employees to engage constructively with all governments in whose jurisdictions we operate. However, before doing so, there are standards of conduct to which our company must hold itself. The guiding principle for adidas is that we remain neutral or independent in our position towards political parties and candidates.

Corporate political activity
Employees may not make political contributions or expenditures on behalf of adidas. This applies broadly and covers any contribution to any political party, candidate, campaign or public official. Political contributions or expenditures include:

- Buying tickets for political fundraising events
- Making company resources available for politically related activities
- Paying for advertisements or politically related campaign expenses
- Making donations that might benefit one political candidate/party over another.

For further information, please see the adidas Corporate Giving Guidelines.

I am committed to the election of a particular candidate in the upcoming election. Can I assist the campaign?

Yes. However, if you choose to volunteer for a political or similar cause, then you must do so in your private time and with your private resources. Any comment or action should be stated as being a reflection of your own personal views and must not be attributed to adidas.

ADIDAS DOES NOT EXERT OR ATTEMPT TO EXERT ANY IMPROPER INFLUENCE ON THE GOVERNMENT OF ANY COUNTRY IN ORDER TO PRODUCE AN OUTCOME FAVOURABLE TO ADIDAS
Lobbying: outreach to governments in opinion-building or legislation processes

While lobbying is a legitimate activity, the rules governing participation in the political process differ greatly between countries, are complex and may result in significant penalties in the case of any violations.

In many countries stakeholder consultation is part of the legislative process. While the company participates in consultations, we opt for providing input via interest-representing federations or similar joint-mission platforms.

You may be engaged in lobbying if your work involves:

- Contact with politicians, regulators, executive officials or agencies, including on local, regional or national levels, or those holding similar roles within the European Union or other supranational or intergovernmental bodies, e.g. customs unions such as MERCOSUR, ASEAN, and/or the United Nations, World Trade Organisation or World Customs Organisation
- Government contract sales or tendering, including applications for grants and/or government subsidies
- Efforts made to influence legislative or administrative action.

You should always contact Global Government Affairs or your Compliance Officer for advice and consultation on any matters concerning Government Affairs.

A manager asks you to assist a local political candidate with some administrative jobs including printing some campaign materials. Is this okay?

No. It would be against adidas’ policy to use company resources in a way that supports one candidate over another. You should refuse the request, and/or ask your Compliance Officer for further guidance.

Reports to government agencies and cooperation with public investigations

Occasionally, employees of adidas may be asked to make reports to government agencies or to cooperate with their investigations. In dealing with these matters, you must cooperate fully and any information you supply must be truthful and accurate.

To ensure that you act in the appropriate way and also protect the company’s legitimate interests, you must first seek advice from your respective Legal & Compliance team, senior management and – if necessary – your Compliance Officer before responding to any non-routine request.

I’ve just been contacted by a government authority in one of our markets. They are asking for information about our marketing expenditures in particular categories. How should I respond?

You should promptly notify your respective Legal Counsel, senior management and – if necessary – your Compliance Officer before providing this information. Politely explain that adidas policy is to first evaluate requests for information, including whether a court order (subpoena) is required prior to disclosure.
COMMUNICATIONS

WHAT YOU SAY DOES MATTER – PRESERVE OUR COMPANY’S REPUTATION!

While everyone shares the responsibility to protect and enhance adidas’ reputation, some professionals within the company have additional responsibilities when it comes to presenting ourselves. You should contact or refer outside inquiries to the following resources:

- Corporate Communication: is responsible for speaking to the outside world on behalf of adidas and managing our public reputation.
- Investor Relations: handles communications related to the company’s financial performance and all contacts with shareholders and the financial community.
- Global Legal: handles enquiries from lawyers and national authorities.
- Social & Environmental Affairs: handles in close coordination with Corporate Communication, external enquiries relating to any manufacturing partners and sustainability/CSR-related issues.
- Government Affairs: handles representation of the interests of adidas towards relevant stakeholders in local and national governments and also international organisations.
- Human Resources: offers programmes and services and deals with informational requests about employees, including requests for references.

Unless you receive prior approval, you are not authorised to speak on behalf of adidas when presenting your personal views at community, professional or cultural events, or on the Internet, including via social media. Where it might be assumed that you are representing the views of the company, then you should set the record straight, by clearly indicating that the views expressed are your own. (This may not apply for certain functions, such as the Works Council.)
A journalist has contacted me and wants to interview me on behalf of the company. What should I do?

Please forward the media request to the Corporate Communication team who will assess the request and contact the journalist directly. While your participation may be required, it is not permitted to speak on behalf of the company without first speaking with the Corporate Communication team.

I saw a post on the Internet where somebody has criticised our company for its production methods in Asia. The details are completely incorrect. I really want to respond and let them know that our social and environmental policies are the best in our industry. Can I?

No, you should not comment in such situations. While we appreciate your commitment to communicating the facts, here it is best to refer the matter to the Social & Environmental Affairs Department who are well equipped to respond to such posts.

What can I share on social media about the company?

Please use common sense. You can retweet, like and share everything you see on the official channels of adidas and its brands. Also, feel free to share your pride in being an employee of our company with the rest of the world. However, posting confidential information (e.g. pictures/information about products not yet launched, financial details, etc.) is damaging and against our policy.

We have some business partners that we have been working with for years who would like to do a press release and use us as a reference – any concerns?

Yes! We have a clear third-party policy which doesn’t allow any of our partners to market the work they do for us. Contact Corporate Communication in case of questions.

I have been invited to present at a conference on behalf of the company. What is the procedure?

Once you have received approval from your manager, please approach Corporate Communication. They will review your presentation materials to ensure that your presentation is in accordance with adidas’ internal policies. At the conference, you should only speak about your area of responsibility and not speculate about rumours or share any confidential information with the audience. Please remember that the purpose of the conference is not to create news. If you are asked questions or approached for an interview by any media representatives for your views on behalf of the company, then please refer them to Corporate Communication.

What can I share on social media about the company?
ENVIRONMENTAL REQUIREMENTS

OUR GOAL IS TO LEAVE ONLY A POSITIVE IMPRESSION ON THE ENVIRONMENT AROUND US

As a company that operates worldwide, we have a responsibility to look after the environment, both for today and for future generations. Managing our environmental impacts at our own sites and along the supply chain, where our products are designed, created, manufactured, transported and sold, is a key priority for adidas.

OUR EXPECTATIONS

- Prevent environmental damage and enhance adidas returns by promoting the value of conserving our resources
- Detect ways in which we as a company can better reduce our environmental footprint
- Respond to any known issues, including spills, waste or hazards, by quickly and promptly communicating with the Corporate Property + Services Department or your local Facilities Management team.

I’ve seen some things around the office that may be environmentally hazardous, including containers with unknown chemical contents that smell toxic when opened. It is not normally my job to deal with such issues. What should I do?

You should step up! Every adidas employee needs to take action when made aware of potential compliance incidents. That includes reporting these environmental hazards to your manager.
RESOURCES, RECORDS AND INFORMATION MANAGEMENT

BRING TO LIFE COURAGE ASPIRATION SACRIFICE INSPIRATIONAL CURiosity PROMISE TRUSTWORTHY GENUINE EMOTIONS EXCITE ENERGY SPEED ENJOYMENT ENTHUSIASM HEARTBEAT BOOST BELIEVE TEAM SPIRIT PRIDE POWER PASSION DREAM DRIVE JOURNEY DELIGHT INTENSITY DANCE ALIVE JOY FUN LOVE DEDICATION THRILL ZEST ENTHUSIASM SUPPORTERS HEARTBEAT SPORT GUTS INTEREST
CAN YOU KEEP A SECRET?

BE PROUD OF YOUR WORK BY KEEPING OUR TRADE SECRETS – SECRET!

adidas possesses extensive confidential information and trade secrets that have often been created through passionate hard work and are very important to the company’s business and competitive position. Trade secrets may include:

- business plans, methods and forecasts
- formulas and processes
- details of commercial relationships
- financial information
- manufacturing techniques and methods
- information about new inventions, products and technologies
- product designs
- marketing analyses, plans or customer lists
- and other information which has or may have commercial value due to its inaccessibility for the outside world.

While some information is intended to be made public, for example when the company makes an announcement about its accounts or launches campaigns for new product lines, other information is intended to be kept secret until intended for publication, or never to be disclosed at all. We are all required to show proper care and judgement to understand the value of our trade secrets and ensure that this information is stored in a way that prevents its improper disclosure, theft or use.

OUR EXPECTATIONS

- Never be reckless with our confidential information or trade secrets
- Be sensible and exercise caution when discussing the company’s business in public places where conversations can be overheard
- Restrict access to people who have a reason to know the information. That reason should only be one that benefits adidas
- Never prepare sensitive presentations in public places or work with data assets in insecure locations, such as in aircraft, where these can be easily overseen by other people or in Internet cafes where information security cannot be assured
- Do not make posts to social media sites about adidas strategies or product designs unless you have been properly authorised to do so.

Remember that the obligation to protect our company’s confidential information and trade secrets continues even after you leave the company.
An employee in another department wants to know about a project I’m working on and would like to have the details of our latest innovation. Is it okay for me to share this information with her?

Possibly. If the details are in the public domain and have been authorised for release by management, then there is no problem. However, if the innovation is still in development and it is not necessary for other employees to know the requested details for them to do their jobs, then before sharing this information, you should consult with your manager.

I have taken over a new office, but the last employee left CDs in the cupboards. I need to dispose of these items. They look rather old, but are labelled with titles including ‘Business Data’ and ‘Marketing Data’ and the words ‘Highly Confidential’ and ‘Confidential’. Can I just throw these in the normal waste?

No. First you should evaluate whether these items should be retained. If it is decided to dispose of them, then you should dispose of them in the confidential disposal bins provided within your office space. If you cannot locate these bins or have not been informed about alternative collection programmes for sensitive information, then contact your manager or Compliance Officer for further information and advice.
The company’s information technology and communications systems are vital to enable us to conduct our business and reach out to our consumers. The data transmitted, received and stored by or within those systems are valuable assets that we must protect.

OUR EXPECTATIONS

Passwords
You are responsible for your corporate credentials. Passwords must meet corporate standards and must be kept private and therefore not shared, coded into programs or written down. IT Security must be informed in the event that a password is suspected of having been compromised. Do not share your passwords with anyone at any time.

Mobile security
You must protect adidas assets. Usage of mobile devices is greatly increasing globally. It is extremely important that you treat your mobile device like any other Corporate IT device. Mobile device security can be breached and infected just like a PC, laptop, etc. Never click links, download files or execute programs on your mobile device unless it is required and you are certain of the source and legitimacy of the content. Always protect such items from loss, theft or damage.

Acceptable usage
It is not permitted to use company information technology and communications systems (including email, instant messaging, the Internet or intranet) for activities that are harmful, unlawful, unethical, immoral or otherwise contrary to the Code of Conduct or policies set out in the Global Policy Manual.

OUR VOICE

I’m moving house and need to check my private email to retrieve a document. Would my use of the computer system be appropriate in these circumstances?

Yes, adidas understands that employees sometimes need to take care of personal matters while at work and this may involve occasional, limited personal use of the company’s information technology systems. This is permitted as long as the privilege is not abused and no significant unnecessary costs are incurred to adidas. If you need further information, then you should discuss this with your manager.
COMPANY FUNDS: MAINTAINING ACCURATE RECORDS

As the Company’s shares are publicly traded, there is no greater need for us to live our value of integrity than in the way we take care of our books, records and accounting.

We must handle adidas funds, including anything that has or represents financial value, responsibly, honestly and in accordance with applicable company policies, including those set out in the Global Policy Manual.

You must only create accurate records that reflect the true nature of the transactions and activities that they record. Descriptions contained in records must not be the result of guesswork, general rather than specific as to their descriptions or altered in any way that is deceptive or compromises our integrity. Discrepancies in any records must be reported and appropriately corrected.

What does the term ‘record’ mean?

This term is used broadly and includes not only financial records but information relating to adidas’ employees, research & development activities, strategic plans, travel and expense claims, and general operations.

Violation of the above requirements will not be tolerated as it could lead to, among other consequences, legal liability for both the individuals involved and the company.

Our Expectations

• Prevent any incentive to engage in fraud or wrongdoing by communicating that targets must be reached with integrity, and never via deception

• Detect inappropriate payments, invoices or financial records via suitable internal controls and ask questions as to the validity of any descriptions recorded therein

• Respond to any inappropriate conduct by raising this to your manager, Compliance Officer or confidentially via the Fair Play Hotline.

It is never acceptable to take any part, no matter how small your role, in any activity that involves theft, fraud, embezzlement, extortion or misappropriation of property. Your participation in a fraud occurs any time that you help conceal, alter, falsify or omit information in our records either for your benefit or at the direction of any others. You must refuse to engage in any questionable activities and must follow up any suspicions. You must always avoid unacceptable conduct that might create the appearance of fraud.

IT IS NEVER ACCEPTABLE TO

• Direct anyone to prepare or approve a misleading record

• Enter into agreements on behalf of adidas without the proper authority

• Alter sales results or stock reports, even if a customer asks you to

• Falsely report time worked

• Misstate financial information in the company’s books and records

• Manipulate performance measures, including evaluations.
Retaining Company records
We retain business records in accordance with document retention requirements in the markets in which we conduct our business. These must be retained or destroyed only in accordance with the company’s document retention policy. If in doubt, ask the Finance or Legal & Compliance department for advice.

Full and fair disclosure
adidas is committed to transparency and truthfulness in financial reporting. This gives our investors a fair and accurate view of the company’s performance, allowing them to make informed investment decisions. All disclosures must therefore be complete, true, accurate, timely and understandable. This also means that you must be cooperative and truthful with internal and external auditors. Misleading, interfering with, or failing to cooperate with an audit or related investigation seriously compromises our integrity and could result in employment consequences.

You must ensure that you do not selectively disclose material non-public information about adidas, its securities, financial condition, results or plans. Such disclosures must first be reviewed by the adidas Investor Relations Department.

I am concerned that my market’s quarterly sales report is not accurate. What should I do?
Speak openly with your manager and colleagues. If you are still uncomfortable, contact your Compliance Officer.

We work in Supply Chain Management. Recently, we had a delivery sent out on a Tuesday, but for some reason my manager requested me to record the shipment on all the paperwork as being sent out on the Monday of the previous week. Is this a problem?
Yes. We must record all transactions accurately and correct any errors as soon as they are identified. It is no excuse to say someone else directed you to create a record that you knew or had reason to suspect was false or misleading.

I am discouraged that my market’s quarterly sales report is not accurate. What should I do?
Speak openly with your manager and colleagues. If you are still uncomfortable, contact your Compliance Officer.
Anyone who, in good faith, reports a suspected legal or ethical compliance incident or conflict of interest, whether or not that suspicion turns out to be valid, will not be subject to retaliatory or disciplinary action or to any other adverse employment consequences.

An employee who retaliates against someone who has reported a violation may be subject to training or other employment consequences including disciplinary action up to and including termination of employment or [if applicable] cancellation of their relationship with the company.

**Own conduct**

Nothing in this Code of Conduct shall be construed as excusing any person from their own misconduct or protecting them from disciplinary action as a result of their self-reporting that misconduct. However, the fact that a person self-reported their own wrongdoing will be taken into consideration in determining an appropriate response.

**Victims of retaliation**

Any person who reasonably believes that they have been subject to retaliation due to their disclosure of a legal or ethical compliance incident, or potential conflict of interest, shall immediately inform either their local Compliance Officer or the Chief Compliance Officer.

**Waivers**

All employees are required to comply with this Code of Conduct at all times. If, due to extraordinary circumstances, an employee in good faith believes that a waiver to a part of this Code is required, then such a waiver must be requested to the Chief Compliance Officer.

Waivers will only be issued where it is appropriate under the circumstances and in cases where the waiver will not present a material financial or reputational risk to adidas.

Any waivers requested by a member of the Executive Board must be directed to the Chairman of the Audit Committee of the Supervisory Board and will be promptly disclosed, as and if required by applicable law or stock exchange regulations.

Details of all waivers will be published internally on the Fair Play section of the intranet.
How to report a compliance violation

If you have questions or need to report a potential compliance violation, there are numerous resources available to you.

Remember that some issues can be resolved directly with the person whose conduct is concerning you. If this is not possible, then other channels include your Line Manager, your Local Compliance Officer, Human Resources Manager or the local Works Council (where available).

You may also contact our confidential Fair Play Hotline managed by our external and independent provider if you would like to report details of a compliance or ethics violation:

→ 00 800 72332255, from any country in the world (or local numbers, where applicable)
→ fairplay@safecall.co.uk

Please refer to the Fair Play App on the intranet for further details.