



# CODE OF CONDUCT

ADIDAS FOUNDATION

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The background is a solid yellow color with large, abstract, hand-painted brushstroke patterns in a slightly darker shade of yellow. These strokes are scattered across the upper and right portions of the image, creating a textured, artistic feel.

# **FAIR PLAY AT THE ADIDAS FOUNDATION**

## WHAT DOES FAIR PLAY MEAN, AND WHY DO WE HAVE A CODE OF CONDUCT?

As individuals working for the adidas Foundation, we seek to bring into action the mission of changing the world through sport. This will only be possible if we make all decisions following the interests of the adidas Foundation and the partners and communities we work with and not ourselves.

Simply put, we aim to always do the right thing – because we are convinced of the importance of it. We value integrity at all times and we are guided by our values of responsibility, curiosity, joy and collaboration. This Code of Conduct therefore follows the principle of Fair Play and lines out the rules of the game for how we ensure we act with integrity in our day-to-day work. It is the result of an internal assessment of the potential risks that may arise in our day-to-day operations.

Risks will be continuously documented and tracked through a risk register. A number of preventive controls and measures will be developed as needed to mitigate the most significant risks, including specific policies and guidelines (e.g. Safeguarding Policy, Ethical Communications Guidelines), processes and trainings which will further elaborate on some of the areas within this Code of Conduct which represent areas of most significant risk.

## WHO MUST FOLLOW OUR CODE OF CONDUCT?

**Everyone at the adidas Foundation, from Managing Board members to all employees, must follow this Code of Conduct.**

It is also expected that all other stakeholders who have a formal relationship with the adidas Foundation – such as contractors, volunteers, grantees and suppliers – also play fair and follow our Code of Conduct. Everyone affiliated with the adidas Foundation is expected to conduct themselves according to these ethical standards we have set for the work of the adidas Foundation, as well as to help prevent, detect, and respond to violations of the Code of Conduct. Managers at all levels are expected to provide guidance and support to their direct reports to help them make the right decisions and play fair.

## HAPPENS IF WE DO NOT FOLLOW OUR CODE OF CONDUCT?

We act with integrity because it is the right thing to do. We recognize that the need for the adidas Foundation to exist in the world stems from a number of root causes related to inequality, egoism unethical practices as well as a general lack of transparency and accountability. Especially for this reason we have an inherent duty to ensure we always act with integrity and do the right thing while encouraging others to do the same.

Even a seemingly minor violation of this Code of Conduct could expose the organization or individuals acting on its behalf to serious repercussions – from individual harm, abuse, discrimination, or neglect to reputational harm, fines or even imprisonment. Most importantly, this puts our ability to carry out our mission and follow through on the commitments we have made to partners and communities at risk.

This is why, depending upon the circumstances, individuals could face a range of consequences for violations of the Code of Conduct, including termination of their contractual relationship with the adidas Foundation.





## HOW DOES THE ADIDAS FOUNDATION ENSURE WE FOLLOW OUR CODE OF CONDUCT?

The Managing Board and Senior Leadership Team (SLT) demonstrate their commitment to acting with integrity every day. Their example sets the tone for others associated with the adidas Foundation to bring our Code of Conduct to life. They are committed to establishing an open culture, based on respect and attentiveness. Their work also includes periodic risk assessments conducted with senior and local leadership, regular communication and training to employees, sophisticated financial and audit controls, and investigations when potential violations are reported or detected.

Because it is the responsibility of everyone associated with the adidas Foundation to follow the Code of Conduct, the Managing Board expects anyone who reasonably suspects a violation of the Code of Conduct has occurred or is likely to occur to report their concerns immediately. As outlined in the final section of the Code of Conduct, there are several ways to do this – including anonymously in most situations. Importantly, the adidas Foundation will never retaliate against any individual who reports such a suspicion in good faith.





**INTEGRITY IN  
HOW WE CONDUCT  
OURSELVES**



## COMPLYING WITH LAWS IN THE COUNTRIES WE OPERATE

We follow the rules in the places where we operate

As a global organization, the adidas Foundation will comply with the laws and regulations applicable in each country or other jurisdiction in which we or our partners operate. This includes all laws or regulations related to tax-exempt organizations and activities as well as sanctions, money laundering and terrorism financing. We hold ourselves and our partners to the highest standard in following these rules. In addition, we commit to respecting local cultures and values balancing them to the fundamental rights of every individual.

Any individual affiliate with the adidas Foundation who learns or suspects that someone working for or cooperating with the adidas Foundation has failed to comply with the law or intends to break the law is expected to immediately contact the Managing Board, their manager or report it to [fairplay@adidasfoundation.org](mailto:fairplay@adidasfoundation.org).

# PREVENTING BRIBERY AND CORRUPTION

*We never tolerate bribery or corruption*

## What is bribery and corruption?

A bribe is any personal advantage offered with the intent to create an inappropriate business advantage or for any other illegitimate business purpose. Bribes can take many forms, including money, gifts, tickets, entertainment, travel, promises of employment or future business relationships, or even charitable donations when made for an improper purpose. Corruption is any abuse of a position of trust for personal gain.

## Why it matters:

We win on our own merits and expect that those we work with do so as well. We never offer or accept any personal advantage for the purpose of winning contracts, obtaining favourable commercial terms, influencing public officials or otherwise seeking an inappropriate business advantage.

Bribery and any corrupt behaviour are running against our commitment to integrity and violate the trust our supporter and partner confide in us. Moreover, as far as criminal laws are breached, those acts come with severe consequences for both the adidas Foundation and the individuals involved, such as significant fines, penalties, and imprisonment. Those sanctions are even more extreme in the cases of bribery or corruption involving public officials.



## Our expectations:

*Anyone conducting business or programming on behalf of the adidas Foundation must:*

- Immediately reject any bribes and not offer any bribes to anyone under any circumstances;
- Not use their position for personal gain or the benefit of potential close associates.
- Recognize and take steps to stop any potential bribery or corruption or the appearance of bribery or corruption involving the adidas Foundation or any of our partners;
- Strictly follow all applicable operating standards which are owned or approved by the adidas Foundation (e.g., grantmaking, procurement of goods and services, vetting);
- Report any suspected, actual, attempted, or potential instances of bribery or corruption involving any adidas Foundation employees or partners.
- Only accept or offer gifts, tickets, or entertainment if it is appropriate and proportionate in comparison to the relationship between giver and receiver (e.g., adidas Foundation staff can be invited for coffee or a reasonable/proportionate dinner during a work-visit but it may not accept the invitation of taking a side-trip to a beautiful island close-by))
- All gifts, tickets, entertainment or hospitality of any sort that is valued above €100 must always be reported to the adidas Foundation Managing Board and recorded in the gifts and hospitality register. Even below the 100 EUR threshold, hospitality of

any sort may not be accepted if presented in expectation of a favor or service from the adidas Foundation in return (do-ut-des-Principle).

## RECOGNIZING AND AVOIDING CONFLICTS OF INTEREST

*When taking decisions on behalf of the adidas Foundation we never put personal interests or loyalties above the interests of the Foundation and we ensure objective and neutral decision-making*

### What is a conflict of interest?

A conflict of interest exists when an individual's personal interests or loyalties conflict with, interfere with, or take preference over what may be in the best interest of the adidas Foundation or communities the Foundation aims to serve. Conflicts of interest can arise in many circumstances, including when individuals acting on behalf of the adidas Foundation have personal or business relationships with vendors, grantees, donors or other business partners.

### Why it matters:

Inequality, bias, egoism and lack of accountability are at the core of many social and environmental issues that our organization intends to face and overcome. Anyone making decisions on behalf of the adidas Foundation must always take care to only act in the best interest of the organization and its mission. Making decisions on any other basis is a threat to our credibility, our reputation and our effectiveness in creating the change in society that we have set out to achieve.

## Our expectations:

*Anyone conducting business or programming on behalf of the adidas Foundation must:*

- Use good judgment and recognize when a personal or business relationship creates a conflict of interest or the appearance of a conflict of interest;
- Always declare conflicts of interest, potential conflicts of interests as well as situations which may be perceived by others as conflicts of interests, to a member of the adidas Foundation Managing Board or Senior Leadership Team as soon as they arise so that mitigation measures or a decision to refrain from the decision altogether can be undertaken and documented
- Comply with all relevant policies and procedures when assessing, selecting, and managing grantees, employees, suppliers, vendors, or other partners, including by always choosing and managing partners on objective criteria such as quality, cost, reliability, and most importantly contribution to achieving our mission; and
- Always declare conflicts of interest at governance level (i.e., adidas Foundation Shareholder Meeting or adidas Foundation Managing Board) prior to any formal decision making, ensuring that the conflicted individual recuses themselves from the entire discussion and decision-making process and that this is properly documented within meeting minutes.



## FINANCIAL INTEGRITY AND ETHICS

*When taking decisions on behalf of the adidas Foundation we never put personal interests or loyalties above the interests of the Foundation and we ensure objective and neutral decision-making*

### What is financial integrity & ethics?

Financial integrity and ethics refer to the careful and responsible use of resources, particularly financial resources, in alignment with the adidas Foundation's mission and statutes. It involves making ethical decisions, ensuring transparency, and adhering to legal and moral obligations. This includes maintaining compliant and accountable financial practices, ensuring funds are used efficiently for the mission, and avoiding any misuse of resources for personal or associate gain. It also involves the ethical management of fundraising, donor relations, and procurement.

### Why it matters:

As a non-profit organization we have a legal and moral obligation to ensure that all resources, in particular financial resources, are used in the most effective and appropriate way to help realize our mission. We expect that anyone utilizing these resources on behalf of the adidas Foundation do so with the highest level of care and consideration to ensure minimal waste, maintain the maximum amount of funds being allocated directly to carrying out the organization's mission, and ensure transparent, compliant, and accountable financial

practices at all times. Not only does this ensure we are always aligned with our values, but it is a legal requirement which must be followed to ensure we are maintaining the appropriate balance of administrative versus programmatic spend. This ensures that the integrity of our mission remains intact and that we remain focused on achieving the outcomes we have set out for the organization.

## Our expectations:

*Anyone conducting business or programming on behalf of the adidas Foundation must:*

- Approval thresholds and processes for budget approval and financial transactions, including all requirements to demonstrate proof of spend for valid business purposes, as well as expense policies are expected to be followed at all times by anyone involved in such processes.
- Both internal and external audits will be undertaken as required to ensure best practices and meet legal requirements. Full cooperation in this process is expected by any individual or organization affiliated with the adidas Foundation.
- All fundraising activities conducted on behalf of the adidas Foundation must be done transparently and ethically, without making any misleading promises to or placing any pressure on potential donors.
- While all donations must be accepted voluntarily and without coercion, donations may be declined or returned, if the donor's values, behavior, or activities are not in alignment with our ethical principles as laid out in our Values, this Code of Conduct or our policies, and guidelines. Donations that are restricted must align with the adidas Foundation's mission and strategy.
- Procurement and due diligence standards of the adidas Foundation must always be followed when selecting partners, vendors and other business partners. The same applies to anyone sub-granting or sub-contracting on our behalf.
- Financial management must be timely, accurate and in accordance with general acceptable accounting and reporting standards and strategic planning practices. The same is expected of any individual or organization that the Foundation partners with.
- Financial information, including major donors, restrictions of donations and use of our financial resources, will be shared publicly through the Foundation's website and annual report. The same is expected of our partners – proactively or at the very least, upon request prior to entering into a formal relationship.

*We have an extraordinary collective duty to act in the best financial interest of our organization, consistently demonstrating sound judgment and ethical behavior in all financial decisions. To uphold this responsibility, we commit to ongoing training in financial stewardship, ensuring we - from the Managing Board to employees - are equipped with the knowledge and skills necessary for effective financial management, decision-making, and risk mitigation.*

**INTEGRITY IN HOW  
WE TREAT ONE  
ANOTHER**





## **SUPPORTING A DIVERSE WORKFORCE AND A CULTURE OF INCLUSION**

*We are committed to fostering a respectful, equitable, and inclusive environment for all employees*

### **What is diversity and inclusion?**

Diversity at the adidas Foundation means ensuring our teams, partners and associates reflect the vibrant range of people and communities we support around the world, inclusive of race, color, gender identity, sexual orientation, ability, age, education, background, and other factors. Inclusion means championing individual uniqueness and creating a feeling of belonging.

### **Why it matters:**

Diversity and inclusion are crucial to our ability to help create the future of sport which contributes positively to all aspects of society. We foster an open, respectful, and collaborative culture and value all our employees and partners for their individual talents, perspectives, and experiences. Only through the contributions of people with different identities, backgrounds, and perspectives can we continue to innovate and change the world through sport.



## Our expectations:

*All individuals associated with the adidas Foundation must:*

- Treat everyone with fairness and respect;
- Demonstrate an open and inclusive mindset by deliberately seeking out, listening to, and learning from different ideas, perspectives, and approaches when building teams and collaborating on projects; and
- Recognize and confront their own personal blind spots to foster understanding of one another's differences.

## FAIR, SAFE AND EQUAL TREATMENT FOR ALL

*We never tolerate behaviors which cause emotional or physical harm to others*

All individuals, regardless of their background or beliefs, deserve fair, equal and respectful treatment and protection, however we acknowledge that additional care must be taken to ensure that those who are vulnerable (e.g. children, refugees, persecuted individuals) do not suffer harm or experience abuse, discrimination, and neglect as a result of our work or from the work of our partners around the world.

The adidas Foundation has a zero tolerance policy on behaviors which have such effects on others. This includes but is not limited to bullying, harassment, abuse, exploitation, discrimination, unequal treatment, coercion or neglect. Any suspected instances of these behaviors occurring by an individual directly affiliated with the adidas Foundation or one of our partners must be reported without delay. We believe everyone is entitled to all the rights and freedoms to live their lives, and especially to practice their sport, without enduring any of these harms. More details related to this topic can be found in our safeguarding policy.

**Furthermore, we believe that all individuals, organizations and vendors are entitled to fair, equal and respectful treatment.** Whether hiring staff, selecting projects and partners for funding or choosing external service providers, we will always do so based on objective criteria and take steps to minimize and

challenge personal bias. We do not give special treatment based on personal relationships or referrals from people in influential positions and commit to being transparent about the selection criteria and processes being used. Capacity to contribute positively to helping us achieve our charitable purposes will always be the most heavily weighted criteria. Additionally, we expect that for goods and services procured by the adidas Foundation or its partners, multiple quotes are sought to ensure fair and competitive pricing as part of the selection process.



## ENSURING A SAFE WORKPLACE

*We care about all employees' health and safety*

We do not compromise on the health and safety of the individuals we work with to carry out our mission. We conduct our work in a sustainable, safe, and healthy manner, including by providing safe working environment and complying with all local health and safety laws and regulations in the places where we are active.

All adidas Foundation employees, volunteers and contractors must use all provided safety equipment at all appropriate times and, when necessary, immediately address any unsafe working conditions.

Anyone traveling on adidas Foundation business is expected to follow the Travel Safety and Security Policy as well as any particular guidance or recommendations for the specific travel destination at all times and may be denied further opportunities to participate in business travel if they are found to not be in compliance with it. All individuals asked to travel on behalf of the adidas Foundation have full rights of refusal without consequences at any time should there be concerns about safety or security.

**INTEGRITY IN  
HOW WE HANDLE  
AND SHARE  
INFORMATION**



## MAINTAINING AND PROTECTING INFORMATION

*We ensure our records are complete, accurate and timely and protect sensitive and personal information of our business, partners and employees.*

### What is information maintenance and protection?

Financial integrity and ethics refer to the careful and responsible use of resources, particularly financial resources, in alignment with the adidas Foundation's mission and statutes. It involves making ethical decisions, ensuring transparency, and adhering to legal and moral obligations. This includes maintaining compliant and accountable financial practices, ensuring funds are used efficiently for the mission, and avoiding any misuse of resources for personal or associate gain. It also involves the ethical management of fundraising, donor relations, and procurement.

### Why it matters:

Maintaining and protecting information is crucial to safeguarding the integrity and trustworthiness of an organization's operations. Accurate and complete records are essential for organizational decision-making and fulfilling legal and reporting obligations to partner organizations, donors, and authorities. Any mishandling of information, whether through inaccuracy, omission, or unauthorized disclosure can damage individuals, the adidas Foundation's reputation, harm stakeholder relationships, and lead to legal consequences. Additionally, protecting information helps prevent unauthorized access, disclosure, modification, or destruction, and is essential for preserving trust, privacy, confidentiality, and regulatory compliance. In this process, since we collect, store, and process individual data, we follow the European General Data Protection Regulation and obtain consent to collect, store and process individual information. Our Head of Operations is also our Data Protection Officer.



## Our expectations:

- Always accurately document the necessary information relating to transactions in a timely manner, and never purposely alter or omit information to present an inaccurate picture of a transaction.
- Use information only for authorized purposes and ensure it is not disclosed to unauthorized internal or external parties.
- Protect the adidas Foundation's sensitive information from inadvertent disclosure by never creating, accessing, or using our sensitive information in a public setting where it may be overheard or viewed.
- Follow company-provided guidelines on utilization of tools, software and safeguarding of passwords and comply with IT acceptable use policies.
- Ensure that the adidas Foundation's Data maintenance, protection, retention and deletion guidelines are always followed, which help ensure that GDPR and other relevant laws are being adhered to at all times.
- Refuse to record inaccurate information and promptly report any suspicious transactions or suspected unauthorized use or disclosure of sensitive or personal information to your manager, the Managing Board or the Head of Operations.
- Protect the integrity of data and information we share, and ensure we are only sharing it in a way that is both ethical and aligned with our values. The Ethical Communications

Guidelines, including guidelines on social media and other communication channels, must always be used when sharing any data or information externally.

*Follow the organization's informed consent procedures as laid out in the ethical communications and data collection guidelines at all times and only store details which are necessary, being sure to do so in a manner which is secure, aligned with the consent the subject gave, and promptly deleted when no longer required for legitimate business purposes – or when the data retention period which was communicated to the subject has expired.*

The background features a dark teal color with several thick, expressive brushstrokes in a lighter teal and a vibrant orange. A stylized white globe icon with orange grid lines is positioned in the upper right quadrant. The text 'YOUR RESPONSIBILITIES' is written in a bold, white, sans-serif font in the bottom left corner.

# YOUR RESPONSIBILITIES



## HOW TO REPORT VIOLATIONS AND OUR NO-RETALIATION POLICY

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**We expect all employees and partners to help protect the individuals and organizations we work with; and reporting violations will never result in retaliation**

Every one of us, that is every adidas Foundation employee and partner is responsible for assisting the Managing Board and the Senior Leadership Team in preventing, detecting, and responding to potential violations of this Code of Conduct. This includes a steadfast expectation that employees speak up any time they believe a violation of the Code of Conduct has occurred or is likely to occur.

Any individual who reports in good faith a suspicion of a violation or potential violation of our Code of Conduct is protected against any form of retaliation, regardless of whether the individual's suspicion turns out to be valid. Conversely, any individual who retaliates or attempts to retaliate against a someone who has reported or intends to report a suspected violation of the Code of Conduct – including by pressuring or threatening the reporting individual not to report the suspected violation – may be subject to disciplinary action.

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**If you are aware of a violation or potential violation of our Code of Conduct, please take one of the following actions immediately:**

- Email to [fairplay@adidasfoundation.org](mailto:fairplay@adidasfoundation.org)
- Speak with your manager or point of contact at the adidas Foundation
- Contact the Managing Director or Head of Operations.

The same applies if you believe you are being pressured, threatened, or otherwise retaliated against in connection with reporting or intending to report a suspected violation of the Code of Conduct.