

## **GLOBAL SOURCING GUIDELINES**

### **Introduction**

Foot Locker, Inc. (“Foot Locker”) is concerned about the safety and fair treatment of all workers who manufacture the products Foot Locker sells, wherever the workers are located.

### **Purpose and Scope**

These Global Sourcing Guidelines (these “Guidelines”) apply worldwide to Foot Locker’s suppliers. These Guidelines require all of Foot Locker’s suppliers to respect certain employment standards that Foot Locker believes are universal, notwithstanding more relaxed standards (if any) that may be imposed by applicable local laws. Foot Locker endeavors to choose reputable suppliers who are committed to ethical standards and business practices, and who recognize that empowered workplaces are productive, profitable, and successful. Foot Locker expects its direct suppliers, as well as its direct suppliers’ partners, suppliers, and subcontractors used in the production of Foot Locker’s products (collectively, “Subcontractors”) to comply with all legal requirements applicable to the conduct of their business(es).

### **Supplier Responsibilities**

Each of Foot Locker’s suppliers agrees that, by accepting orders from Foot Locker or any of its subsidiaries, it will abide by and implement the following requirements and require the same from each of its Subcontractors:

**Anti-Bribery and Anti-Corruption.** Foot Locker will only deal with suppliers who comply with applicable anti-bribery and anti-corruption laws.

**Child Labor.** Child labor is not permissible. Workers may not be younger than 15 years of age (or 14 where local law permits) or the age for completing compulsory education, if higher.

**Forced Labor, Slavery, and Human Trafficking.** Forced labor, whether in the form of prison labor, involuntary, or slave labor (including human trafficking), indentured labor, bonded labor, or otherwise, is not permissible. Employment must be voluntary.

**Wages and Benefits.** Foot Locker will only deal with suppliers who compensate their workers fairly and timely by providing wages, overtime premiums, and benefits that comply with legally-mandated minimum standards or the appropriate prevailing wage to meet worker’s basic needs. Foot Locker expects all of its suppliers and Subcontractors to maintain accurate books and business records in accordance with all applicable laws and other requirements.

**Health and Safety.** Foot Locker will only deal with suppliers who provide their workers with a safe and healthy work environment designed to prevent accidents and injury to health arising out of, or occurring in the course of, work. Foot Locker’s suppliers must comply with all applicable, legally- mandated minimum standards for workplace health and safety.

**Harassment and Abuse.** All workers must be treated with respect and dignity. Foot Locker will not deal with suppliers whose workers are subjected to corporal punishment or mental or physical coercion and/or physical, sexual, psychological, or verbal harassment or abuse.

**Working Hours.** Foot Locker will only deal with suppliers who maintain reasonable work hours, not exceeding prevailing local standards or any maximum prescribed by applicable laws. Overtime work shall be consensual, and other than in extraordinary circumstances, workers must be allowed to have at least one weekly rest day, and the sum of weekly working hours, including overtime, shall not exceed 60 hours. Suppliers shall comply with applicable laws that entitle workers to paid annual leave, casual leave, and holidays.

**Nondiscrimination.** Employment should be based on ability and not on belief or any other personal characteristics. Foot Locker will only deal with suppliers who do not practice discrimination in employment, including in hiring, salary, benefits, advancement, discipline, termination, retirement, or any other aspects of employment on the basis of race, color, nationality, ethnic origin, gender, religion, age, sexual orientation, marital status, disability, or similar factors.

**Freedom of Association and Collective Bargaining.** Suppliers must respect the right to free association and grant their workers the right to bargain collectively without unlawful interference.

**Environment and Sustainability.** Foot Locker expects its suppliers to have a commitment to sustainability, reduce waste, and work toward reducing its carbon emissions in line with international climate targets. Environmental sustainability means being mindful of one's carbon footprint and seeking ways in which to reduce it. Each supplier facility must comply with all laws and regulations relating to environmental protection in the country in which it operates. Foot Locker expects suppliers to implement reasonable measures to mitigate negative impacts generated from their operations on the environment.

**Conflict Minerals and Restricted Chemicals.** All raw materials and substances used to produce Foot Locker's products must comply with all applicable rules, laws, and regulations, including conflict minerals regulations and chemical content and exposure laws.

**Subcontracting.** Suppliers will not utilize Subcontractors in the manufacturing of products for Foot Locker without Foot Locker's prior written approval and only after the applicable Subcontractor has agreed to comply with these Guidelines. Further, Foot Locker's suppliers must maintain a socially responsible supply chain and source components and materials from companies that share Foot Locker's values regarding human rights, ethics, and environmental responsibility.

**Cargo Security.** Each supplier is responsible for safeguarding the security of the merchandise to the point of delivery to Foot Locker. Suppliers will take the necessary steps to ensure all shipments of merchandise to Foot Locker are secure and do not contain illegal materials or substances, illegal drugs, contraband, or weaponry.

Each of Foot Locker's suppliers acknowledges that its failure to honor these Guidelines will compel Foot Locker to reevaluate, and possibly terminate, its business relationship with such supplier.

These Guidelines are distributed annually by Foot Locker to each of its suppliers. In order to assure that these Guidelines are available to the workers for whom they are meant to protect, Foot Locker also requires its suppliers to provide training for workers and post these Guidelines prominently on the premises where Foot Locker's products are manufactured.

These Guidelines are an integral part of our purchase agreements with our suppliers. **To assure suppliers' compliance with these Guidelines, Foot Locker reserves the right to make periodic, unannounced inspections of its suppliers' facilities.** Suppliers agree to maintain and provide upon request all documentation necessary to demonstrate compliance with these Guidelines.

## **Questions and Comments**

Foot Locker welcomes questions and comments regarding these Guidelines, all of which should be sent to Foot Locker's Secretary at Foot Locker, Inc., 330 West 34th Street, New York, New York 10001.