



WFSGI CODE OF CONDUCT

GUIDING PRINCIPLES

2026 EDITION

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I. INTRODUCTION

1.1 ABOUT

The World Federation of the Sporting Goods Industry (WFSGI) was formed in 1978 to promote the world's sporting activities, to standardize the size of equipment and the rules of sport, to improve the standards of quality for sporting goods and to promote responsible and sustainable practices in sporting goods internationally. These objectives guide the WFSGI's role in setting shared expectations for responsible business conduct across the sporting goods industry. Today, the WFSGI consists of a diverse global membership including brands, manufacturers, retailers and national and regional sports federations ("member").

The ideals of the WFSGI are the ideals of sport, and the organization seeks to promote fairness, honesty, mutual understanding and high ethical standards. WFSGI is committed to fostering a sports industry in which members actively build business partnerships with those who share the values of sport and take responsibility for making the values real through active engagement.

WFSGI members recognize the important role they play in the global economy and their influence on the social and economic conditions under which sporting goods are produced. That influence is exercised both through their actions as "employers", and, far more profoundly, through their decisions as customers of companies that serve as suppliers of goods and services ("suppliers").

WFSGI also acknowledges that companies operate under different legal, economic, social and cultural environments and these differences merit understanding and respect.

1.2 SCOPE & OBJECTIVES

This Guidance translates the principles of the WFSGI Code of Conduct 2026 into practical implementation expectations. It is intended to:

- Clarify how Code requirements can be implemented and evidenced in practice.
- Support proportionate implementation across different company sizes and contexts
- Promote consistent interpretation across supply chains
- Strengthen practical human rights and environmental due diligence

The Code and this Guidance must be read together. The Code sets the mandatory standards. This Guidance explains how those standards can be implemented and evidenced in practice.

This document does not replace national law, collective agreements, or company-specific standards. Where members apply higher internal standards, those standards remain applicable.

1.3 ALIGNMENT WITH INTERNATIONAL STANDARDS

The Code is grounded in internationally recognised frameworks, including:

- ILO Conventions and Recommendations
- The ILO Declaration on Fundamental Principles and Rights at Work
- The UN Guiding Principles on Business and Human Rights (UNGPs)
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- Internationally recognised occupational health and safety standards

This Guidance supports implementation in a manner consistent with these frameworks, without duplicating them.

1.4 LEGAL HIERARCHY AND APPLICATION OF HIGHER STANDARDS

Members and suppliers must comply with all applicable laws and regulations.

Where differences or conflicts arise between national law and the requirements of the Code, the higher standard should be applied to maximise protection for workers, communities, and the environment, to the extent legally permissible.

Where applying the higher standard may place a supplier at risk of breaching national law, members should:

- Document the legal constraint
- Engage constructively with the business partner
- Identify alternative measures that achieve equivalent protective outcomes
- Avoid commercial pressure that would require unlawful conduct

Such situations should be reviewed periodically, particularly where legal frameworks evolve.

1.5 WHO THIS GUIDANCE IS FOR

This Guidance is designed to support:

- Suppliers — in building practical management systems and workplace controls
- Managers, HR teams, and supervisors — in applying the Code consistently
- Members — in fulfilling due diligence responsibilities across their value chains
- Auditors and assessors — in evaluating implementation objectively

It applies to members' own operations and to suppliers, subcontractors, recruitment agents, and other relevant business partners involved in sporting goods production. For simplicity, the term “employer” used throughout this Guidance refers to both members and suppliers when they are responsible for workers.

1.6 HOW TO USE THIS GUIDANCE

This Guidance supports a risk-based approach. It does not prescribe a single compliance model.

Members are expected to use the Code and this Guidance to:

- Identify and prioritise their most severe and likely human rights and environmental risks
- Integrate these risks into sourcing, purchasing, production planning, and management systems
- Prevent and mitigate adverse impacts
- Enable access to remedy where harm occurs
- Monitor effectiveness and improve over time

Not all Code provisions will present equal risk across all operations or supply chains. Members should prioritise issues based on:

- Severity of potential impact
- Likelihood of occurrence
- Vulnerability of affected groups

Compliance is not achieved through policies alone. Effective implementation requires management systems, worker awareness, monitoring, and corrective action.

II. CODE REQUIREMENTS

2.1 LEGAL COMPLIANCE

INTENT

To ensure members and their business partners operate in full compliance with applicable laws and apply the higher standard where international expectations exceed local legal requirements.

IMPLEMENTATION GUIDANCE

Legal compliance is the foundation of the Code. Members and suppliers should have structured processes to ensure ongoing compliance rather than relying on informal knowledge.

Members and suppliers should:

1. Maintain Legal Awareness

- Identify applicable labour, environmental, health and safety, tax, trade, product safety, and data protection laws in each operating and sourcing country.
- Assign responsibility for monitoring legal updates.
- Review legal compliance at least annually or when entering new jurisdictions.

2. Apply the Higher Standard

Where differences exist between national law and the Code:

- Apply the higher standard where legally permissible.
- If national law restricts application of the higher standard, document the constraint.
- Engage constructively to identify alternative measures that provide equivalent protection.
- Avoid commercial pressure that would require unlawful conduct.

3. Cascade Requirements

- Include Code expectations in supplier contracts.
- Require suppliers to communicate expectations to subcontractors.
- Maintain visibility, where feasible, over subcontracting arrangements.

4. Maintain Evidence of Compliance

Legal compliance should be demonstrable through documentation, not assumed.

ILLUSTRATIVE EVIDENCE

- Register of applicable legal requirements
- Named compliance responsible person or function
- Updated licences and permits
- Contract clauses referencing Code compliance
- Periodic internal legal compliance review records

RELEVANT INTERNATIONAL STANDARDS

- ILO Declaration on Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises

2.1.1 BUSINESS INTEGRITY: ANTI-CORRUPTION, BRIBERY & ETHICS

INTENT

To ensure business is conducted with integrity, transparency, and accountability.

IMPLEMENTATION GUIDANCE

Members and suppliers must actively prevent corruption rather than reacting only when incidents occur.

1. Policy & Governance

- Maintain a written anti-corruption and ethics policy.
- Define prohibited practices clearly (bribery, facilitation payments, embezzlement, conflicts of interest, anti-competitive conduct).
- Assign responsibility for oversight.

2. Risk Assessment

- Conduct periodic corruption risk assessments, particularly in high-risk markets.

- Assess exposure related to customs clearance, licensing, inspections, public procurement, and intermediaries.

3. Controls

- Implement financial controls and approval procedures.
- Maintain accurate books and records.
- Monitor third-party agents and intermediaries.
- Establish conflict-of-interest disclosure procedures.

4. Reporting & Investigation

- Provide confidential channels for reporting concerns.
- Investigate allegations promptly and impartially.
- Take corrective and disciplinary action where violations are confirmed.

5. Training

- Provide training appropriate to employee roles and exposure risk.

ILLUSTRATIVE EVIDENCE

- Anti-corruption policy
- Conflict of interest declarations
- Training attendance records
- Investigation records
- Due diligence procedures for third parties

RELEVANT INTERNATIONAL STANDARDS

- OECD Anti-Bribery Convention
- UN Convention Against Corruption
- Transparency International Business Principles for Countering Bribery

2.1.2 DATA PROTECTION & INFORMATION SECURITY

INTENT

To protect personal data and confidential business information from misuse, loss, or unauthorised access.

IMPLEMENTATION GUIDANCE

Members and suppliers should manage personal data responsibly, particularly worker information and commercially sensitive data.

1. Data Mapping

- Identify categories of personal and sensitive data collected (e.g. employee records, payroll, health information, supplier data).
- Define lawful and legitimate purposes for processing.

2. Data Handling Controls

- Limit access to authorised personnel.
- Implement secure storage (physical and digital).
- Use password protection and encryption where appropriate.
- Maintain retention and deletion procedures.

3. Confidentiality

- Ensure employee files are stored securely.
- Protect whistleblower identities.
- Safeguard commercially sensitive supplier information.

4. Incident Management

- Establish procedures for responding to data breaches.
- Document incidents and corrective actions.

5. Training

- Train relevant staff in data handling and confidentiality obligations.

ILLUSTRATIVE EVIDENCE

- Data protection policy
- Access control procedures
- IT security protocols
- Breach response procedure
- Confidentiality agreements

RELEVANT INTERNATIONAL STANDARDS

- EU General Data Protection Regulation (GDPR) (where applicable)
- ISO/IEC 27001 Information Security Management

II.II WORKING CONDITIONS

2.2.1 RISK-BASED HUMAN RIGHTS & ENVIRONMENTAL DUE DILIGENCE

INTENT

To identify, prioritise, prevent and address adverse human rights and environmental impacts linked to operations and supply chains.

IMPLEMENTATION GUIDANCE

Employers should implement an ongoing due diligence process proportionate to their size, structure and risk exposure.

1. Risk Identification

- Identify actual and potential human rights and environmental risks across operations and supply chains.
Prioritise risks based on severity and likelihood.
- Pay particular attention to vulnerable groups (e.g. migrant workers, women, young workers).

2. Integration into Business Decisions

- Integrate findings into sourcing, purchasing, and production planning.
Align internal incentives to support responsible practices.

3. Prevention & Mitigation

- Develop action plans to address identified risks.
- Assign responsibility and timelines.

4. Tracking & Review

- Monitor effectiveness of mitigation measures.
- Update risk assessments periodically.

5. Remedy

- Enable access to remedy where harm has occurred.
- Address root causes to prevent recurrence.

ILLUSTRATIVE EVIDENCE

- Documented risk assessment
- Action plans and follow-up records
- Management review documentation
- Records of stakeholder engagement

RELEVANT INTERNATIONAL STANDARDS

- UN Guiding Principles on Business and Human Rights
- OECD Due Diligence Guidance for Responsible Business Conduct
- ILO Tripartite Declaration

2.2.3 MANAGEMENT SYSTEMS

INTENT

To ensure structured and consistent implementation of Code requirements.

IMPLEMENTATION GUIDANCE

Employers should establish management systems that support compliance and continuous improvement.

1. Policies & Procedures

- Maintain written policies aligned with the Code.
- Ensure policies are communicated to workers.

2. Roles & Responsibilities

- Assign clear responsibility for implementation.
- Define escalation procedures.

3. Training

- Provide regular training for managers and supervisors.

- Train workers on their rights and workplace policies.

4. Monitoring & Improvement

- Conduct internal reviews.
- Implement corrective action plans.
- Review purchasing practices and production planning impacts.

ILLUSTRATIVE EVIDENCE

- Written policies
- Training records
- Internal audit reports
- Corrective action plans

RELEVANT INTERNATIONAL STANDARDS

- ILO-OSH 2001
- ISO 45001 (reference)

2.2.4 CHILD LABOUR

INTENT

To prevent the employment of children below the minimum legal age and protect their best interests.

IMPLEMENTATION GUIDANCE

1. Age Verification

- Implement reliable and non-intrusive age verification procedures.
- Maintain accurate personnel records.

2. Recruitment Controls

- Train HR personnel on minimum age requirements.
- Apply controls to subcontractors.

3. Remediation

- Remove children from hazardous work immediately.
- Develop a child-centred remediation plan.
- Support access to education.
- Engage families or guardians appropriately.

ILLUSTRATIVE EVIDENCE

- Personnel files with age documentation
- Child labour remediation procedure
- Records of remediation measures

RELEVANT INTERNATIONAL STANDARDS

- ILO Convention 138
- ILO Convention 182

2.2.5 PROTECTION OF YOUNG WORKERS

INTENT

To protect workers under 18 from hazardous or inappropriate work.

IMPLEMENTATION GUIDANCE

1. Hazard Assessment

- Identify tasks unsuitable for young workers.
- Restrict hazardous duties.

2. Working Hours Protection

- Limit hours in line with law.
- Prohibit night work.

3. Supervision & Support

- Provide appropriate supervision.
- Ensure documented employment agreements.

ILLUSTRATIVE EVIDENCE

- Young worker register
- Hazard assessment records
- Employment agreements

RELEVANT INTERNATIONAL STANDARDS

- ILO Convention 138
- ILO Recommendation 146

2.2.6 FORCED OR BONDED LABOUR AND HUMAN TRAFFICKING

INTENT

To ensure all employment is voluntary and free from coercion.

IMPLEMENTATION GUIDANCE

1. Recruitment Practices

- Apply the Employer Pays Principle: workers must not pay recruitment or placement fees and any such costs must be borne by the employer.
- Monitor labour agents.
- Include recruitment standards in contracts.

2. Worker Freedom

- Ensure workers retain personal documents.
- Ensure freedom of movement.
- Allow voluntary resignation.

3. Contract Transparency

- Provide written contracts in a language understood.
- Prevent contract substitution.

4. Remediation

- Reimburse recruitment fees if identified.

- Review and strengthen recruitment oversight.

ILLUSTRATIVE EVIDENCE

- Recruitment policy
- Worker interviews
- Reimbursement records

RELEVANT INTERNATIONAL STANDARDS

- ILO Conventions 29 & 105
- ILO General Principles on Fair Recruitment
- IOM IRIS Standard

2.2.7 NON-DISCRIMINATION

INTENT

To ensure equal treatment and opportunity in all employment practices.

IMPLEMENTATION GUIDANCE

1. Fair Recruitment & Promotion

- Base employment decisions on objective criteria.
- Ensure equal remuneration for men and women for work of equal value in accordance with international labour standards.

2. Workplace Protection

- Protect pregnant workers and caregivers.
- Ensure equal treatment of migrant workers.

3. Grievance Handling

- Provide confidential reporting channels.
- Investigate discrimination complaints promptly.

ILLUSTRATIVE EVIDENCE



- Recruitment policies
- Payroll records
- Grievance records

RELEVANT INTERNATIONAL STANDARDS

- ILO Conventions 100 & 111

2.2.8 DISCIPLINARY MEASURES

INTENT

To ensure disciplinary practices respect dignity and due process.

IMPLEMENTATION GUIDANCE

1. Prohibited Practices

- Prohibit physical, psychological, and verbal abuse.
- Prohibit humiliation or degrading treatment.

2. Due Process

- Communicate disciplinary rules clearly.
- Document disciplinary actions.
- Ensure workers have the right to respond to allegations and appeal disciplinary decisions through a transparent grievance mechanism.

ILLUSTRATIVE EVIDENCE

- Disciplinary policy
- Records of disciplinary cases
- Appeal documentation

RELEVANT INTERNATIONAL STANDARDS

- ILO Convention 158

2.2.9 FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

INTENT

To respect workers' rights to organise and bargain collectively.

Implementation Guidance

1. Respect for Worker Choice

- Allow formation of worker organisations.
- Prevent retaliation.

2. Dialogue

- Engage in good faith negotiations.
- Allow reasonable workplace access for representatives.

3. Restricted Environments

- Support alternative worker representation where unions are restricted.

ILLUSTRATIVE EVIDENCE

- Collective bargaining agreements
- Worker committee meeting records
- Policies on non-retaliation

RELEVANT INTERNATIONAL STANDARDS

- ILO Conventions 87 & 98

2.2.10 WAGES AND BENEFITS

INTENT

To ensure lawful and fair compensation.

IMPLEMENTATION GUIDANCE

1. Wage Compliance

- Pay at least the legal minimum or prevailing industry wage.
- Pay wages regularly and on time.
- Provide itemised payslips.
- Ensure equal remuneration for men and women employees for work of equal value.
- Ensure wages are paid regularly, in legal tender.
- Ensure deductions are only made where legally required or permitted through collective agreements.

2. Overtime & Benefits

- Pay overtime at premium rates in accordance with national laws and applicable labour regulations.
- Provide statutory social benefits.

3. Progressive Improvement

- Work toward progressive realisation of living wages where feasible.

ILLUSTRATIVE EVIDENCE

- Payroll records
- Payslips
- Social security payment records

Relevant International Standards

- ILO Global Wage Report
- Anker Living Wage Methodology (reference)

2.2.11 WORKING HOURS

INTENT

To protect worker health and ensure reasonable working time.

IMPLEMENTATION GUIDANCE

Employment relationships must not create economic or social vulnerability for workers, particularly for migrant workers or other vulnerable groups.

1. Regular Hours

- Limit regular hours to 48 per week or legal maximum.

2. Overtime

- Ensure overtime is voluntary.
- Limit total hours to 60 per week except in extraordinary circumstances.
- Pay overtime premiums.

3. Rest

- Provide adequate rest breaks during the working day in accordance with national law.
- Provide at least 24 consecutive hours of rest every 7 days.
- Maintain accurate time records.

ILLUSTRATIVE EVIDENCE

- Timekeeping records
- Overtime consent documentation
- Payroll records

RELEVANT INTERNATIONAL STANDARDS

- ILO Convention 1

2.2.12 REGULAR EMPLOYMENT AND WORKER INVOLVEMENT

INTENT

To ensure stable and legally recognised employment relationships.

IMPLEMENTATION GUIDANCE

1. Written Agreements

- Provide contracts before work begins.
- Include wages, hours, and benefits.

2. Avoidance of Misuse

- Prevent misuse of temporary or agency contracts.
- Monitor labour agencies.

3. Worker Awareness

- Train workers on their rights and responsibilities.

ILLUSTRATIVE EVIDENCE

- Employment contracts
- Agency agreements
- Training records

RELEVANT INTERNATIONAL STANDARDS

- ILO Employment Relationship Recommendation 198

2.2.13 HEALTH AND SAFETY

INTENT

To prevent workplace injuries and occupational illness.

IMPLEMENTATION GUIDANCE

1. Risk Assessment

- Conduct regular hazard assessments.
- Update assessments after incidents.

2. Emergency Preparedness

- Maintain fire safety systems.
- Conduct emergency drills.

3. Protective Measures

- Ensure appropriate protections for vulnerable workers, including young workers, pregnant or nursing workers, and workers with disabilities.
- Provide PPE free of charge.
- Ensure safe chemical storage.

4. Worker Participation

- Establish OHS committees.
- Allow workers to refuse unsafe work.

ILLUSTRATIVE EVIDENCE

- Risk assessments
- Emergency drill records
- OHS committee minutes
- PPE distribution records

RELEVANT INTERNATIONAL STANDARDS

- ILO Convention 155
- ISO 45001

2.2.14 HARASSMENT OR ABUSE

INTENT

To ensure a workplace free from harassment and abuse.

IMPLEMENTATION GUIDANCE

1. Prevention

- Prohibit physical, sexual, psychological and verbal abuse.
- Train supervisors on respectful conduct.

2. Reporting & Response

- Provide confidential reporting mechanisms.

- Investigate allegations promptly.
- Protect against retaliation.

ILLUSTRATIVE EVIDENCE

- Anti-harassment policy
- Training records
- Investigation documentation

RELEVANT INTERNATIONAL STANDARDS

- ILO Convention 190

2.2.15 GRIEVANCE MECHANISM & WHISTLEBLOWER PROTECTION INTENT

To provide safe, accessible channels for raising concerns.

IMPLEMENTATION GUIDANCE

1. Accessibility

- Provide multiple reporting channels.
- Ensure mechanisms are available in appropriate languages.

2. Protection

- Protect whistleblowers from retaliation.
- Maintain confidentiality.

3. Investigation & Remedy

- Document complaints and outcomes.
- Implement corrective actions.
- Communicate resolution where appropriate.

ILLUSTRATIVE EVIDENCE

- Grievance procedure
- Complaints log
- Remediation records

RELEVANT INTERNATIONAL STANDARDS

- UNGP Principle 31

II.III ENVIRONMENT

2.3.1 ENVIRONMENTAL COMPLIANCE & MANAGEMENT

INTENT

To ensure compliance with applicable environmental laws and promote measurable reduction of environmental impacts across operations and supply chains.

Implementation Guidance

Members and suppliers should implement practical environmental management measures proportionate to their size, operations, and risk profile.

1. Legal Compliance

- Identify and maintain all required environmental permits, licences and approvals.
- Monitor compliance with applicable environmental regulations.
- Assign responsibility for environmental compliance oversight.

2. Environmental Management System

- Identify significant environmental aspects and impacts.
- Establish procedures to manage and reduce those impacts.
- Integrate environmental considerations into operational planning.
- Review environmental performance periodically.

3. Resource Use

- Monitor and reduce energy consumption.

- Monitor and reduce water consumption.
- Improve material efficiency where feasible.

4. Pollution & Waste Management

- Minimise waste generation at source.
- Ensure proper storage, handling and disposal of hazardous waste.
- Control air emissions, wastewater discharge and chemical releases.
- Ensure wastewater treatment meets legal requirements.
- Control hazardous substances and emissions in accordance with environmental safety standards and applicable regulations.

5. Chemicals Management

- Maintain inventories of hazardous substances.
- Store chemicals safely and provide appropriate handling training.
- Comply with applicable chemical safety regulations.

6. Continuous Improvement

- Set measurable environmental objectives where feasible.
- Track and review progress annually.

ILLUSTRATIVE EVIDENCE

- Environmental permits and licences
- Environmental policy
- Energy, water and waste tracking records
- Chemical inventory lists
- Waste disposal manifests
- Environmental objectives and performance reviews

RELEVANT INTERNATIONAL STANDARDS

- ISO 14001 Environmental Management Systems
- GHG Protocol (for emissions measurement)
- Paris Agreement (climate action reference)
- OECD Due Diligence Guidance for Responsible Business Conduct

2.3.2 CLIMATE & RESOURCE EFFICIENCY (ENCOURAGED PRACTICES)

INTENT

To support industry transition toward lower environmental impact and resource efficiency beyond legal compliance.

IMPLEMENTATION GUIDANCE

Members and suppliers are encouraged to adopt progressive environmental practices aligned with international climate and sustainability objectives.

1. Greenhouse Gas Management

- Measure Scope 1 and 2 emissions where feasible.
- Identify major emission sources.
- Develop reduction targets appropriate to business scale.

2. Renewable Energy

- Assess feasibility of renewable energy sourcing.
- Set milestones for transition where viable.

3. Water Stewardship

- Identify water-stressed regions within supply chains.
- Implement conservation measures.
- Ensure responsible wastewater treatment.

4. Circularity

- Reduce material waste.
- Increase recycling and reuse initiatives.
- Explore product life extension strategies.

ILLUSTRATIVE EVIDENCE

- Emissions inventory reports
- Energy transition plans
- Water usage data
- Circularity metrics or initiatives

RELEVANT INTERNATIONAL STANDARDS

- GHG Protocol
- Science Based Targets initiative (reference)
- UN Sustainable Development Goals

II.IV COMMUNITY INVOLVEMENT

2.4.1 COMMUNITY ENGAGEMENT & IMPACT MANAGEMENT

INTENT

To ensure responsible engagement with communities affected by business activities and mitigate adverse social impacts.

IMPLEMENTATION GUIDANCE

Members and suppliers should identify and manage potential community impacts arising from operations and supply chains.

1. Impact Identification

- Assess potential impacts on land, water, natural resources and livelihoods.
- Identify vulnerable or marginalised groups.

2. Stakeholder Engagement

- Engage affected communities in good faith.
- Provide accessible channels for community feedback.
- Document engagement activities.

3. Mitigation Measures

- Address identified adverse impacts.
- Develop action plans where community concerns arise.

4. Indigenous Rights (Where Applicable)

- Respect the rights of Indigenous peoples.

- Consider the principles of Free, Prior and Informed Consent (FPIC) where activities may affect Indigenous peoples.

5. Grievance Access

- Ensure communities have access to grievance mechanisms.
- Investigate and address complaints in a timely manner.

ILLUSTRATIVE EVIDENCE

- Community impact assessments
- Stakeholder engagement records
- Community grievance logs
- Action plans addressing community concerns

RELEVANT INTERNATIONAL STANDARDS

- UN Declaration on the Rights of Indigenous Peoples
- OECD Due Diligence Guidance
- UN Guiding Principles on Business and Human Rights

III. CROSS-CUTTING REQUIREMENTS

3.1 RISK-BASED DUE DILIGENCE

INTENT

To ensure that members and suppliers systematically identify, prevent, mitigate and address adverse human rights and environmental impacts linked to their operations and value chains.

IMPLEMENTATION GUIDANCE

Due diligence is an ongoing management process, not a one-time assessment. It should be proportionate to company size, operational complexity and risk exposure.

1. Risk Identification

- Identify actual and potential human rights and environmental risks across operations and supply chains.
- Prioritise risks based on severity, likelihood and vulnerability of affected groups.
- Update assessments periodically and when entering new markets or sourcing regions.

2. Integration

- Integrate risk findings into sourcing, purchasing, product development and production planning.
- Assign internal accountability for mitigation measures.

3. Prevention & Mitigation

- Develop time-bound action plans.
- Engage suppliers and business partners in improvement processes.
- Use corrective action plans where non-compliance is identified.

4. Tracking Effectiveness

- Monitor progress through internal reviews, supplier engagement and performance tracking.
- Adjust mitigation strategies where necessary.

5. Access to Remedy

- Ensure affected individuals have access to grievance mechanisms.
- Address root causes to prevent recurrence.

ILLUSTRATIVE EVIDENCE

- Documented risk assessments
- Action plans and follow-up records
- Supplier engagement documentation
- Minutes of the management review

RELEVANT INTERNATIONAL STANDARDS

- UN Guiding Principles on Business and Human Rights
- OECD Due Diligence Guidance for Responsible Business Conduct

- ILO Tripartite Declaration

3.2 RESPONSIBLE PURCHASING PRACTICES

INTENT

To ensure that members' commercial practices do not undermine compliance with this Code.

IMPLEMENTATION GUIDANCE

Members should recognise that purchasing decisions directly affect working conditions and environmental performance.

1. Planning & Forecasting

- Set realistic lead times.
- Avoid last-minute order changes that may cause excessive overtime or subcontracting.
- Align production volumes with supplier capacity.

2. Pricing Practices

- Set prices that reasonably allow compliance with wage, safety and environmental requirements.
- Avoid commercial practices that incentivise non-compliance.

3. Internal Alignment

- Align sourcing, merchandising and sustainability functions.
- Include responsible business considerations in supplier selection and retention decisions.

4. Supplier Dialogue

- Engage suppliers on root causes of non-compliance.
- Avoid abrupt disengagement without considering worker impact.

ILLUSTRATIVE EVIDENCE

- Supplier contracts referencing Code compliance
- Production planning records
- Supplier performance scorecards

- Internal policy linking purchasing and compliance

RELEVANT INTERNATIONAL STANDARDS

- OECD Due Diligence Guidance (Purchasing Practices)
- ILO Better Work / Responsible Purchasing guidance
- UNGPs

3.3 TRANSPARENCY & REPORTING

INTENT

To promote accountability and credible communication regarding implementation of the Code.

IMPLEMENTATION GUIDANCE

1. Internal Transparency
 - Report implementation progress to senior management.
 - Maintain records of compliance efforts and corrective actions.
2. External Communication
 - Communicate policies publicly where appropriate.
 - Disclose relevant sustainability information in line with applicable regulations.
3. Data Integrity
 - Ensure accuracy of reported data.
 - Maintain documentation supporting public claims.
4. Continuous Improvement
 - Review reporting processes periodically.
 - Address identified gaps.

ILLUSTRATIVE EVIDENCE

- Public policy statements
- Sustainability or ESG reports

- Internal compliance dashboards
- Data verification procedures

RELEVANT INTERNATIONAL STANDARDS

- UN Guiding Principles Reporting Framework
- OECD Guidelines for Multinational Enterprises
- Applicable national disclosure regulations

3.4 TRAINING & CAPACITY BUILDING

INTENT

To ensure effective implementation of the Code through awareness, competence and engagement.

IMPLEMENTATION GUIDANCE

1. Management Training

- Provide training to managers and supervisors on Code requirements.
- Ensure sourcing and purchasing teams understand their responsibilities.

2. Worker Awareness

- Communicate workplace policies in languages workers understand.
- Provide training on worker rights and grievance mechanisms.

3. Supplier Capacity Building

- Support suppliers in understanding Code expectations.
- Provide guidance on corrective action and continuous improvement.

4. Periodic Review

- Update training materials when requirements change.
- Evaluate training effectiveness.

ILLUSTRATIVE EVIDENCE

- Training materials and attendance records

- Worker communication materials
- Supplier workshops or engagement records

RELEVANT INTERNATIONAL STANDARDS

- ILO Conventions and Recommendations
- UN Guiding Principles on Business and Human Rights

IV. VERIFICATION & COMPLIANCE

4.1 MEMBER RESPONSIBILITY FOR IMPLEMENTATION

INTENT

To clarify that each member is independently responsible for implementing the Code within its own operations and value chains.

IMPLEMENTATION GUIDANCE

Members are responsible for establishing and maintaining appropriate processes to implement the Code in their own operations and to promote alignment within their supply chains.

1. Governance & Oversight

- Assign clear internal responsibility for Code implementation.
- Ensure appropriate management oversight.
- Integrate Code expectations into relevant governance structures.

2. Supply Chain Communication

- Communicate Code expectations to suppliers and relevant business partners.
- Include Code commitments in contractual arrangements where appropriate.
- Encourage suppliers to cascade expectations to subcontractors.

3. Monitoring & Follow-Up

- Establish proportionate mechanisms to assess alignment with the Code (e.g. dialogue, self-assessments, audits, or other appropriate tools).
- Apply enhanced attention in higher-risk contexts.
- Develop corrective action plans where gaps are identified.

4. Escalation

- Address significant or repeated non-alignment through structured engagement.
- Where disengagement is considered, evaluate potential impacts on workers and seek to mitigate adverse consequences where feasible.

ILLUSTRATIVE EVIDENCE

- Governance structure documentation
- Supplier communication materials
- Monitoring procedures
- Corrective action plans
- Records of follow-up engagement

RELEVANT INTERNATIONAL STANDARDS

- UN Guiding Principles on Business and Human Rights
- OECD Due Diligence Guidance for Responsible Business Conduct

4.2 REMEDIATION & CONTINUOUS IMPROVEMENT

INTENT

To promote effective and sustainable resolution of identified issues.

IMPLEMENTATION GUIDANCE

1. Issue Identification

- Investigate reported or identified non-alignment in a timely manner.
- Document findings and determine appropriate next steps.

2. Root Cause Consideration

- Assess underlying contributing factors.
- Develop improvement measures aimed at preventing recurrence.

3. Worker-Focused Approach

- Prioritise protection of affected workers.
- Avoid remediation approaches that create additional harm.

4. Continuous Improvement

- Review trends across findings.
- Update internal procedures where systemic gaps are identified.

ILLUSTRATIVE EVIDENCE

- Investigation documentation
- Corrective action records
- Procedure updates
- Follow-up verification records

RELEVANT INTERNATIONAL STANDARDS

- UNGP Principle 22 (Remedy)
- OECD Due Diligence Guidance

4.3 ROLE OF WFSGI

INTENT

To clarify the role of WFSGI in supporting, but not enforcing, implementation of the Code.

IMPLEMENTATION GUIDANCE

1. Nature of the Code

- The Code establishes shared expectations for responsible business conduct.

- It does not constitute certification, legal advice, or a guarantee of compliance.

2. Member Accountability

- Each member remains solely responsible for compliance with applicable laws and for implementation of the Code within its operations and value chains.
- WFSGI does not conduct audits, certify compliance, or assume legal responsibility for member or supplier conduct.

3. Reporting & Engagement

- WFSGI may request high-level information from members regarding implementation progress for alignment, benchmarking, or learning purposes.
- Such information-sharing does not transfer compliance responsibility to WFSGI.

4. Facilitation & Support

- WFSGI may facilitate knowledge-sharing, capacity building, and collaborative initiatives.
- Participation in such initiatives does not substitute for company-level due diligence.

ILLUSTRATIVE EVIDENCE

- Member participation in WFSGI initiatives
- High-level implementation summaries (where provided)

RELEVANT INTERNATIONAL STANDARDS

- OECD Guidance on Collaborative Initiatives
- UN Guiding Principles on Business and Human Rights

V. GLOSSARY

APPLICABLE LAW

All relevant local, national and international laws, standards, rules and regulations applicable to business operations, including but not limited to employment, the fundamental principles and rights at work, environmental protection, health and safety, and ethical business conduct. Where international standards referenced in this Code provide higher protection than local laws, members are encouraged to apply the higher standard where legally permissible.

CHILD LABOUR

No person shall be employed directly or through business partners at an age younger than 15 unless under the exceptions recognised by the ILO, or below the age for completing compulsory education. Employers shall maintain robust, non-intrusive age verification mechanisms as part of the recruitment process. Where underage employment is discovered, remediation measures must prioritise the best interests of the child and align with recognised good practice.

DUE DILIGENCE

An ongoing process through which companies identify, prevent, mitigate, and account for how they address actual and potential adverse human rights and environmental impacts linked to their operations, products, or services. This process typically includes risk assessment, integration into business decisions, tracking effectiveness, and enabling access to remedy.

EMPLOYER

For the purpose of this Code, “employer” refers to **both members and suppliers when they are responsible for workers.**

EMPLOYER PAYS PRINCIPLE



A recruitment standard under which workers must not pay recruitment or placement fees to obtain employment. All recruitment fees and related costs must be borne by the employer or business benefiting from the worker's labour.

ENVIRONMENTAL MANAGEMENT SYSTEM

An organisational framework used to identify, manage, monitor and improve environmental performance, including policies, procedures, objectives and operational controls.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The right of all workers to freely join or not join organisations and associations of their choice and to bargain collectively without penalty, retaliation or interference. Where these rights are restricted by law, employers must not obstruct or interfere in efforts to establish independent and representative forms of worker organisation and dialogue consistent with international standards.

FORCED OR BONDED LABOUR AND HUMAN TRAFFICKING

Any form of forced, bonded, indentured, or prison labour, coercion, or human trafficking is prohibited. Employment must be voluntary, and employees must have the right to terminate their employment freely, with reasonable notice, in accordance with applicable laws and regulations. This includes protection against deception, withholding of wages, intimidation, threats, abuse of legal or immigration processes, retention of personal documents, or restriction of movement.

GRIEVANCE MECHANISM

An effective operational-level mechanism that is safe, confidential, accessible and compliant with international guidelines, enabling employees and stakeholders to report concerns or violations of the Code. Allegations must be treated seriously and investigated promptly, fairly and transparently, with appropriate remediation where necessary.

HARASSMENT OR ABUSE

Any form of physical, sexual, psychological, or verbal harassment or abuse, including unwelcome behaviour, threats, intimidation, bullying, exploitation, violence, humiliation, or other inhumane or degrading treatment, whether committed by supervisors, colleagues, security forces, or third parties.

MANAGEMENT SYSTEMS

Appropriate systems established and maintained to ensure adherence to the principles covered in the Code. These include, but are not limited to, clear policies and procedures, regular training for relevant personnel, documentation and record-keeping, and systems that ensure accountability and continuous improvement. Management systems should support risk-based due diligence, monitoring, corrective action, and continuous improvement.

MIGRANT WORKERS

Migrant workers, whether foreign or domestic, shall receive treatment and protections equivalent to local workers performing similar work. Where migrant workers are recruited, employers and their suppliers must apply the responsible recruitment protections set out in this Code.

PROTECTION OF YOUNG EMPLOYEES

All legal protections for employees under 18 shall be upheld. No person under 18 shall be engaged in hazardous work or conditions, night work, or tasks likely to jeopardise their health, safety, or morals, as defined by the ILO. Young workers shall be provided with a documented and recognised employment agreement in a language they understand.

REGULAR EMPLOYMENT

A recognised and documented employment relationship established in accordance with national laws, international labour standards, or industry best practices. Recruitment and employment relationships must not cause insecurity, economic vulnerability, or social vulnerability. Employees must receive a written offer or agreement in a language they understand before commencing work. Temporary contracts, subcontracting, or

apprenticeship schemes must not be used to avoid legal obligations or undermine worker rights.

RESPONSIBLE RECRUITMENT

Recruitment practices under which no employees pay any fees to obtain or maintain their jobs. All recruitment fees and related costs must be borne by the employer, not the worker. Employment terms and conditions must be communicated clearly, in a language that workers understand, prior to departure from their home country or region where applicable.

SUPPLIER

An entity that produces goods or provides services for a WFSGI member. The expectations of the Code apply to members, their suppliers, and subcontractors involved in the production of sporting goods.

WAGES AND BENEFITS

Compensation shall be paid regularly and in a timely manner, and in legal tender. Partial or in-kind payments or allowances are permitted only where in line with ILO specifications. Equal remuneration for men and women for work of equal value shall be upheld. No deductions are permitted unless legally required or contractually agreed under a collective bargaining agreement. Employees shall receive their statutory and mandated legal social benefits, and overtime shall be compensated at a premium rate in line with national laws. Members should aspire to progressive improvements in wages in line with international best practices.

WORKER / EMPLOYEE

A person performing work for an employer within the scope of this Code. The Code primarily refers to employees, while also recognising workers and their representatives in relevant provisions. The terms “worker” and “employee” are used interchangeably in this Guidance unless otherwise specified by applicable law.

WORKING HOURS

Employees shall not be required to work in excess of 48 regular hours per week, or the local legal requirement, whichever is more stringent. Overtime work must be voluntary, paid at a premium, and not required on a regular basis. Total regular and overtime hours shall not exceed 60 hours per week unless in exceptional or extraordinary circumstances. Employees shall receive adequate resting breaks during the working day and at least 24 consecutive hours of rest within every 7-day period.

VI. USEFUL EXTERNAL GUIDANCE

The following resources provide practical guidance to support the implementation of the principles outlined in the WFSGI Code of Conduct. These materials are published by internationally recognised organisations and are widely used across global supply chains.

WFSGI provides these links for informational purposes only. Members remain responsible for conducting their own due diligence and determining the most appropriate tools and frameworks for their operations.

HUMAN RIGHTS DUE DILIGENCE

OECD Due Diligence Guidance for Responsible Business Conduct

Practical framework to help companies identify, prevent, mitigate and account for adverse impacts in their operations and supply chains.

https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-business-conduct_15f5f4b3-en.html

OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector

Sector-specific guidance widely used across apparel and sporting goods supply chains.

https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-supply-chains-in-the-garment-and-footwear-sector_9789264290587-en.html

United Nations Guiding Principles on Business and Human Rights (UNGPs)

Global standard outlining the responsibility of businesses to respect human rights and implement human rights due diligence processes.

<https://digitallibrary.un.org/record/720245?v=pdf>

IOE International Organisation of Employers

Practical guidance designed to support companies of all sizes in translating international standards into concrete, operational steps.

<https://www.ioe-emp.org/news/details/new-practical-guide-on-human-rights-due-diligence-for-responsible-business-conduct-implementation>

LABOUR RIGHTS AND WORKING CONDITIONS

International Labour Organization (ILO) Conventions and Recommendations

International labour standards covering fundamental rights at work including child labour, forced labour, discrimination and freedom of association.

<https://www.ilo.org/global/standards/lang--en/index.htm>

ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy (MNE Declaration)

Guidance for companies on labour practices, employment conditions and responsible business conduct.

<https://www.ilo.org/about-ilo/organizational-structure-international-labour-office/ilo-department-sustainable-enterprises-productivity-and-just-transition/tripartite-declaration-principles-concerning-multinational-enterprises-and>

RESPONSIBLE RECRUITMENT AND MIGRANT WORKER PROTECTION

ILO International Labour Organisation Fair Recruitment Initiative

Guidance supporting responsible recruitment and the Employer Pays Principle.

<https://www.fairrecruitment.org/>

IOE International organisation of Employers and the ILO International Labour Organization

A handbook, providing updated and practical tools to identify, prevent and address forced labour risks in operations and supply chains.

<https://www.ilo.org/sites/default/files/2025-11/Combating%20forced%20labour%20-%20A%20handbook%20for%20employers%20and%20business.pdf>

IOM International Organization for Migration – International Recruitment Integrity System (IRIS)

A global standard for ethical international recruitment.

<https://iris.iom.int>

Leadership Group for Responsible Recruitment

Industry guidance and resources supporting the Employer Pays Principle and ethical recruitment practices.

<https://www.responsiblerecruitmenttoolkit.org>

Institute for Human Rights and Business – Dhaka Principles for Migration with Dignity

Guidelines for protecting migrant workers through the recruitment and employment cycle.

<https://www.ihrb.org/dhaka-principles>

OCCUPATIONAL HEALTH AND SAFETY

ILO International Labour Organisation Occupational Safety and Health (OSH) Management System Guidelines (ILO-OSH 2001)

International guidance for developing workplace health and safety management systems.

<https://www.ilo.org/safework>

ISO 45001 Occupational Health and Safety Management Systems

International standard providing a framework for improving employee safety and reducing workplace risks.

<https://www.iso.org/iso-45001-occupational-health-and-safety.html>

ENVIRONMENTAL MANAGEMENT

UN Environment Programme – Sustainable Consumption and Production Guidance

Resources supporting improved environmental performance and resource efficiency.

<https://www.unep.org/explore-topics/resource-efficiency>

ISO 14001 Environmental Management Systems

International standard for implementing structured environmental management systems.

<https://www.iso.org/iso-14001-environmental-management.html>

GRIEVANCE MECHANISMS AND ACCESS TO REMEDY

UN Guiding Principles Reporting Framework

Guidance on implementing grievance mechanisms and tracking remediation efforts.

<https://www.ungpreporting.org>

OECD National Contact Point System

Government-backed grievance mechanisms addressing responsible business conduct concerns.

<https://mneguidelines.oecd.org/ncps>

Please note: The resources above are provided for informational purposes and do not constitute endorsement of any specific organisation, certification scheme, or methodology.