



WFSGI CODE OF CONDUCT

2026

INTRODUCTION

The World Federation of the Sporting Goods Industry (WFSGI) was founded in 1978 to promote global sporting activity, support fair play, standardise equipment and rules, and raise quality and safety standards across the industry. Today, the WFSGI brings together a diverse global membership, including brands, manufacturers, retailers, and national and regional sports federations (“members”).

The ideals of the WFSGI are the ideals of sport — fairness, integrity, mutual respect, and ethical behaviour. We believe that sport should not only inspire on the field, but also through the way it is brought to life, from design and sourcing to production and sales.

This Code of Conduct (“Code”) reflects the shared values and responsibilities of WFSGI members in promoting ethical, fair, and sustainable business practices across the global sporting goods industry. It is built on internationally recognized human rights, labour, and environmental standards. It is intended to guide members and their supply chain partners in upholding responsible business practices that protect people, planet, and the spirit of sport.

WFSGI members recognise their role and influence in shaping global supply chains. This responsibility extends not only through their own operations as brands, manufacturers, retailers, and employers, but also through their decisions as customers of suppliers and service providers.

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

The Principles of the WFSGI Code of Conduct are grounded in:

- Relevant Conventions of the International Labour Organization (ILO),
- The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy,
- The Universal Declaration of Human Rights,
- The UN Guiding Principles on Business and Human Rights (UNGPs)
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and
- Internationally accepted occupational health and safety standards.

In line with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, members are expected to embed a risk-based human rights and environmental due diligence process to assess and prioritise risks and impacts, integrate and act to prevent or mitigate them, track effectiveness, and communicate and enable remedy where appropriate.

The topics in this Code reflect common and salient risks identified across the sporting goods value chain through prior versions (1997, 2016) and member benchmarking and involvement. Members should conduct their own due diligence to identify their most salient risks and apply these provisions accordingly, without derogating from the principles in this Code. Where relevant, members should engage affected stakeholders or their representatives (such as workers, unions, community representatives, or credible civil society) to perform risk assessment and mitigation measures.

This Code sets out high level principles intended to guide WFSGI members in promoting responsible business practices within their own operations and supply chains. WFSGI is not a regulator and does not supervise, direct, audit, or control the activities of its members or their suppliers. Each member remains solely responsible for compliance with applicable laws and regulations and for the actions and omissions of its own employees, contractors, suppliers, and business partners. Nothing in this Code creates legal or contractual obligations owed by WFSGI to any third party, nor does it create any partnership, contractual relationship, agency, joint venture, or employment relationship between WFSGI and any member.

WFSGI acknowledges that its members operate in different legal, economic, and cultural environments. These differences are respected, but the expectations in this Code apply to members, their suppliers, and subcontractors involved in the production of sporting goods.

This Code also applies to all organizations that participate in affiliated WFSGI programs, including (but not limited to) WFSGI Pledge signatories, whether or not they are WFSGI members. Participation in these programs implies full acceptance of this Code.

I. LEGAL COMPLIANCE

Member companies and their suppliers are expected to operate in full compliance with relevant local, national and international laws, standards, rules and regulations applicable to their business operations including but not limited to employment, the fundamental principles and rights at work, environmental protection, health and safety, ethical business conduct, consumer protection and product safety. Where differences or conflicts arise between this Code and applicable national or international laws or standards, members and their suppliers are expected to apply the higher standard consistent with the UNGPs and OECD Guidelines.

Members and their suppliers shall maintain appropriate visibility, to the extent feasible, over subcontractors involved in the production process and require subcontractors to meet the same standards of compliance as set out in this Code.

1. Business Integrity: Anti-Corruption, Bribery & Ethics

Members and their suppliers shall conduct business with integrity, transparency, and fairness. Any form of corruption, bribery, extortion, or embezzlement is strictly prohibited. This includes but is not limited to offering or accepting anything of value to influence decisions or gain improper advantage, misuse of company resources and confidential information, money laundering, conflict of interest and anti-competitive practices. Companies must have clear policies and procedures in place to prevent, detect and respond to unethical behaviour.

2. Data Protection & Information Security

Members and suppliers shall implement appropriate measures to protect personal data and confidential information. This includes compliance with applicable data protection and cyber security laws and ensuring secure handling, storage, and transmission of sensitive information.

II. WORKING CONDITIONS

Employers shall implement risk-based human rights and environmental due diligence consistent with the UNGPs and OECD Guidelines, including risk assessments, integration of actions, tracking, communication, and enable access to remedy where appropriate, with attention to salient risks and vulnerable groups. Local industry standards should prevail when higher than the local legal requirements. In countries where the legal requirements fall short of internationally recognised standards, it is recommended that members should apply the following criteria:

3. Management Systems

Employers shall establish and maintain appropriate management systems to ensure adherence to the principles covered in this Code. These systems shall include but are not limited to:

- Clear policies and procedures;
- Regular training for relevant personnel;
- Documentation and record-keeping;

Maintaining systems that ensure accountability and continuous improvement including mechanisms for internal reporting and corrective action.

Members and suppliers should consider the impact of their purchasing and production planning practices on working conditions, including wages, working hours, and employment stability. These systems should support ongoing human rights and environmental due diligence.

4. 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. Any legally permitted exceptions under international standards must not interfere with compulsory education or expose the child to risk. Employers shall establish and maintain robust, non-intrusive age verification mechanisms as part of the recruitment process, which may not degrade or disrespect the worker in any way.

Where underage employment is discovered, remediation measures must prioritise the best interest of the child and align with recognised good practice (e.g. education continuity and appropriate income support for families), with special care to protect workers under 18 during any transition.

5. Protection of Young Employees

All legal protections for employees under 18 shall be upheld and no person under the age of 18 shall be engaged in hazardous work or conditions, or night work, or any tasks likely to jeopardize their health, safety, or morals, as defined by the ILO. Employers and their business partners shall ensure that employment does not cause insecurity or social or economic vulnerability for the under 18 employee. Young workers shall be provided with a documented and recognised employment agreement in a language they understand using whichever national or international standard affords the greatest protection.

Special care and consideration must be given to the working hours of young workers, in accordance with laws and international guidelines. Special care will also be taken to identify measures in a proactive manner in cases of dismissal and removal of under 18s to ensure the protection of these young employees.

6. Forced or Bonded Labour and Human Trafficking

Employers and their suppliers shall not engage in any form of forced, bonded, indentured, or prison labour, nor in any other form of coercion or human trafficking.

Employees must be engaged voluntarily and have the right to terminate their employment freely, with reasonable notice, in accordance with applicable laws and regulations.

Employers and their suppliers shall implement the principles of responsible recruitment, ensuring that:

- 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.
- Workers retain possession and control of their personal documents, including passports and identity papers.
- Workers receive a timely refund of fees that they have paid to obtain or maintain their jobs.
- Workers have full freedom of movement, both during and outside working hours, subject only to reasonable, proportionate, and lawful restrictions related to safety, security, or residential arrangements, and without coercion or penalty.
- Employment terms and conditions are communicated clearly, in a language that workers understand, prior to departure from their home country or region.
- Any employment must not involve deception, withholding of wages, intimidation, threats, or abuse of legal or immigration processes.

7. Non-Discrimination

All employees shall be treated with dignity, fairness and respect. There shall be no discrimination in any employment practice including: recruitment, compensation, access to training, promotion, discipline, termination, or retirement, on the basis of but not limited to: race, colour, ethnicity, social group,

nationality, caste, gender, gender identity or expression, age, religion or belief, disability, sexual orientation, political affiliation or opinion, marital or parental status, caregiver responsibilities, pregnancy, health conditions (including HIV status), neurodiversity, or any other status protected by applicable law.

Foreign or domestic migrant workers shall receive equal treatment and protections in line with local workers in similar roles and conditions.

8. Disciplinary Measures

Employers shall prohibit any form of corporal punishment, physical or mental coercion, verbal abuse, violence, humiliation, or other inhumane or degrading treatment either by management or other workers.

All disciplinary measures must be fair, lawful, and non-discriminatory, clearly defined and communicated to workers in a language they understand, be consistently applied and appropriately documented. Employees must have the right to respond or appeal through an accessible, transparent, and confidential grievance mechanism and be carried out without any threat of retaliation for filing a complaint.

Employers must maintain systems that ensure accountability, due process, and continuous improvement in protecting the rights and dignity of all workers.

9. Freedom of Association and Collective Bargaining

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

Employers shall encourage meaningful and inclusive representation of all workers and engage with chosen representatives regardless of their gender, role or employment status. Where workers are represented by trade unions or other legitimate worker representatives, employers shall allow reasonable access to the workplace for the purpose of carrying out representative functions, in line with applicable laws and agreements.

10. Wages and Benefits.

Employees shall receive compensation regularly and in a timely manner, and in legal tender. All partial or "in-kind" payments or allowances will only be concluded if in line with ILO specifications. Equal remuneration for men and women employees for work of equal value shall be upheld. No deductions will be permitted unless legally required or contractually agreed upon as part of a collective bargaining agreement. All employees will be granted their statutory and mandated legal social benefits that their position and seniority is owed without negative impact on the salary. Overtime hours 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. Employers shall pay at least the minimum or prevailing industry wage, whichever is higher, and comply with all legal requirements on wages and benefits. Where wages do not yet meet workers' basic needs, employers should work toward the progressive realisation of a living wage in line with recognised benchmarks.

11. 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 and paid at a premium and not be required on a regular basis. The sum of regular and overtime hours in a week must not exceed 60 hours unless in exceptional or extraordinary circumstances. Employees shall receive adequate resting breaks during the working day and be entitled to at least 24 consecutive hours of rest within every 7 day period. National legal requirements, industry standards or collective agreements within international

frameworks set out by the ILO will be complied with to promote a healthy work-life balance for employees.

12. Regular Employment and Worker Involvement

Employees shall be employed under a recognised and documented employment relationship or legally recognised engagement agreement established in accordance with national labour and social security laws, international labour standards or industry best practices.

Employers shall ensure that recruitment and employment relationships must not cause insecurity, economic vulnerability, or social vulnerability. Employees must receive a written offer or written agreement in a language they understand, before commencing. This document must include:

- Rights & responsibilities
- Working hours
- Wages and payment terms
- Entitlements to statutory benefits and protections.

Employers must not use temporary contracts, subcontracting, or apprenticeship schemes to avoid legal obligations or undermine worker rights. All employment arrangements must reflect genuine work purposes and not be used to evade legal obligations. Employees, particularly those from vulnerable groups (e.g. migrant workers, women, young workers), must be provided with training on their rights and responsibilities and recruiters, brokers and intermediaries should support and reinforce this training.

13. Health and Safety

Employers shall provide a safe and healthy working environment that complies with all applicable national Occupational Health and Safety (OHS) laws by identifying, assessing and mitigating physical, chemical, and biological hazards and risks. In cases where international OHS standards go beyond local laws, employers are expected to follow the higher recognised international standard. OHS practices must be designed to prevent accidents, injuries, and illnesses arising from, linked to, or occurring during the course of work or resulting from employer operations and facilities. All legally required permits, licenses, insurances, and safety documentation must be in place and regularly updated.

Employers are responsible for the following:

- Risk Assessments & Prevention: employers shall establish proactive systems to identify, assess, prevent, and mitigate health and safety risks, including foreseeable emergencies.
- Protection for Vulnerable Workers: Special provisions must be in place for expecting and nursing mothers, young workers (under 18), and persons with disabilities. This includes tailored work assignments, adjusted conditions and personal protective equipment (PPE) suited to their needs.
- Occupational Health & Safety Training: Employees must receive regular OHS training throughout their employment, with additional training for high-risk roles and to workers newly assigned to such roles.
- Fire Safety & Emergency Preparedness: Employers must take effective measures to minimise hazards and ensure preparedness for fire, chemical exposure, and other emergencies.
- Personal Protective Equipment (PPE): PPE must be provided free of charge, be appropriate for the risk level, and meet international safety standards.
- Hygiene & Sanitation: Employers must ensure the availability of:
 - Safe and clean drinking water free of charge.
 - Adequate rest areas, eating facilities, and food storage options where applicable.
 - Private and secure toilet facilities for all genders with washbasins and running water, soap and towels.
- Worker Participation: Employers must establish an Occupational Health & Safety Committee or other appropriate worker participation mechanism to ensure that workers and their representatives are consulted and encouraged to participate actively in all elements of the OSH

management system. This committee should meet regularly and play a role in monitoring, reviewing, and improving workplace safety.

- **Medical Assistance & Compensation:** Employers must provide access to occupational medical care and ensure that workers are covered by appropriate insurance for injuries and illnesses resulting from work.

All employees have the right to refuse unsafe work. Employees have the right to exit the premises and/or stop working without permission in dangerous situations or uncontrolled hazards, provided they have fulfilled their obligation to inform the employer or supervisor of the hazards and imminent danger where possible. All standards shall apply to employee residential facilities, where provided by the employer.

14. Harassment or Abuse

Every employee has the right to be treated with respect and dignity and to work in an environment that is free from harassment, abuse, and any form of inhumane or degrading treatment. Employers shall prohibit all forms of physical, sexual, psychological, and verbal harassment or abuse, whether committed by supervisors, colleagues, security forces or third parties. This includes unwelcome behaviour, threats, intimidation, bullying, and exploitation in any form. Prompt, fair, and effective action must be taken when violations occur. Disciplinary actions must be appropriate, consistent, and aligned with national legal frameworks.

15. Grievance Mechanism & Whistleblower Protection

Employers must establish or participate in effective operational-level grievance mechanisms that are safe, confidential, accessible and comply with international guidelines enabling employees and stakeholders to report concerns or violations of this Code. Whistleblowers shall be protected from any form of retaliation, including dismissal, demotion, harassment, or other adverse impacts. Allegations must be treated seriously and investigated promptly, fairly, and transparently, with appropriate remediation where necessary.

III. ENVIRONMENT

Members and their suppliers must comply with all applicable environmental laws and regulations. Beyond compliance, members and suppliers are encouraged to take measurable steps to reduce their environmental impact and implement responsible business practices. This includes:

- **Implement an environmental management system** that identifies, assesses, prevents, and mitigates significant environmental risks and impacts, where feasible.
- **Business integration:** embed environmental considerations into business decisions, policies, and operational planning.
- **Resource Use:** use resources such as energy, water and raw materials responsibly, aiming at reducing consumption and improving efficiency.
- **Pollution and Waste Reduction:** minimize pollution, emissions, waste and hazardous substances generation (including solid, liquid, and gaseous emissions), through enhanced operational controls, waste reduction initiatives, and improved production processes in accordance with applicable environmental safety standards.
- **Transparency:** are encouraged to track, document, and disclose upon request environmental performance and improvements.

Members and suppliers are also encouraged to set and pursue clear, measurable management approaches or ambitions, which may include:

- Renewable energy: transition to renewable energy where feasible and set milestones for implementation.
- Carbon footprint reduction (GHG emissions): establish measurable goals and take active steps to measure, report, and reduce their emissions.
- Water conservation and responsible wastewater management: adopt practices that promote water conservation and ensure responsible wastewater management.
- Zero-Waste Goals: work toward zero-waste-to-landfill through prevention, reuse, and recycling practices.
- Circularity Metrics: track progress in circularity, such as material recovery rates, product reuse, or closed-loop initiatives.

Members and suppliers are encouraged to demonstrate leadership through active participation in initiatives that drive broader environmental progress across the industry.

IV. COMMUNITY INVOLVEMENT

Members and their suppliers recognise the economic and social impact of their work and should engage meaningfully with affected communities. Where activities affect land, water, or resource use, they should identify and address potential adverse impacts through due diligence and engagement processes consistent with international standards, with particular attention to the rights of Indigenous peoples and local communities.

V. COMPANY SPECIFIC STANDARDS

Members are encouraged to draw up their own specific code of ethical conduct, if they have not already done so, building on the above standards.

VI. VERIFICATION & COMPLIANCE

These Principles are intended to provide guidance for members and suppliers to ensure their business operates responsibly. Members are expected to take reasonable steps, consistent with applicable law, to align their own operations and supply chains with these principles. WFSGI does not audit, certify, independently verify, or enforce members' compliance with this Code and assumes no duty to monitor or investigate member conduct. Any information shared by members regarding implementation of the Code is provided on a self-reported basis, and WFSGI may rely on such information without verification. WFSGI may seek clarification from members, signposting the relevant statutory guidance or regulators. WFSGI may, from time to time, invite members to share high-level information about their implementation efforts for learning, benchmarking, or dialogue purposes. Such engagement does not constitute oversight, approval, or endorsement of member practices by WFSGI.

Date, Signature

Name of Signatory