

Academy Sports + Outdoors (“Academy”) is committed to conducting its domestic and global operations honestly, ethically and in compliance with all applicable laws, and strictly prohibits all forms of corruption and bribery.

This Anti-Corruption & Anti-Bribery Policy applies to all team members, individuals and entities working on Academy’s behalf in any capacity including, but not limited to, officers, board members, contingent workers, and vendors (collectively, “Academy’s Agents”).

## **I. COMPLIANCE**

Academy prohibits all forms of corruption and bribery, whether intentional or unintentional. Corruption is the abuse of power for private gain, and typically involves bribery. Bribery is the offering, promising, giving, accepting or seeking Anything of Value (as defined in Section III below), whether directly or indirectly through a third party, to influence the actions of any individual, such as to assist in obtaining or retaining business, regulatory approvals or some other benefit, or any improper advantage, from public officials or representatives of commercial organizations.

Academy requires compliance with all applicable anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act (FCPA), U.K. Bribery Act (UKBA) and similar laws of other countries.

## **II. RESPONSIBILITIES**

Responsibilities of team members and Academy’s Agents include the following:

- 1) Do not engage in corruption, bribes or acts that create the impression of a bribe.

Examples may include gifts, charitable or political contributions, discounts, preferential treatment, tax benefits, purchase decision influence, employment, expedited permit approval, or the award of a contract.

- 2) Do not improperly influence or encourage the action or decision of a Government Official (as defined in Section III below) or any third party for favorable business treatment.

- 3) Do not give or offer payments (sometimes referred to as a facilitation payment) to a Government Official in any country to secure or expedite a routine government action such as obtaining licenses or permits.

Examples may include payment of travel related expenses or fees paid to Government Officials for speeches, advisory capacity, or consultant fees.

- 4) Prevent those doing business with or on behalf of Academy from engaging in corruption or bribery.

- 5) Do not threaten or retaliate against anyone who has refused to offer or accept a bribe or who has raised concerns about possible corruption or bribery.

- 6) Disclose and/or obtain approval for the payment or receipt of Anything of Value (including travel benefits, gifts, entertainment and contributions) in accordance

with Academy's Ethics and Code of Conduct Policy and/or any applicable Academy policy, procedure or standard.

- 7) Comply with Academy's records retention, financial reporting, and financial control requirements.
- 8) Complete required training related to this Policy.
- 9) Immediately notify Academy of any suspected or actual violations of this Policy or the law by contacting management, Human Resources, the Ethics Committee, or Academy's Aware Line by phone at (888) 503-0808 or online at [awareline.academy.com](http://awareline.academy.com). Academy encourages all Academy Agents to ask questions regarding compliance with this policy. Academy will not tolerate any form of retaliation for "good faith" reports of suspected violations of this policy or applicable laws.

In the rare situation where there is an imminent threat to an individual's health or safety, a personal safety payment may be made without prior approval to secure immediate safety. Circumstances surrounding actual or potential personal safety payments must be immediately reported and will be investigated by Academy's Ethics Committee.

### III. DEFINITIONS

- 1) **Government Official:** Refers to any:
  - Officer, official, employee or agent of any U.S. or non-U.S. government or public international organization (e.g., United Nations, World Bank) or any agency, department, or business working for or on behalf of any U.S. or non-U.S. government or public international organization (including officers, officials, employees or agents of a company or business owned [even partially], controlled, or operated by any U.S. or non-U.S. government);
  - U.S. or non-U.S. political party or officer, official, employee, or agent of a U.S. or non-U.S. political party;
  - Candidate for U.S. or non-U.S. political office;
  - Employees of private companies where a U.S. or non-U.S. government owns a controlling interest or exercises control over the company;
  - Officers and employees of a state-owned or state-controlled enterprise (such as state-owned banks, hospitals, schools, manufacturing facilities, utilities, oil companies, and mining companies);
  - Close family member of a Government Official, such as a spouse, parent, grandparent, sibling, child, niece, nephew, aunt, uncle, first cousin, or any other individual who shares the same household with the Government Official; or
  - Individual acting on behalf of any of the above.
- 2) **Anything of Value:** Includes, but is not limited to:
  - Cash, gift cards, and other cash equivalents in any amount;
  - Gifts, meals, entertainment, travel, lodging, and other hospitality;

- Training;
- Products or services;
- Business, employment, education, or investment opportunities;
- Contractual rights or waivers;
- Discounts or credits;
- Commissions, kickbacks, rebates, loans, or other compensation;
- Payments of other expenses;
- Political donations or charitable contributions.

Violation of this or any Academy policy, procedure, or standard may lead to disciplinary action up to and including termination of employment, as well as civil or criminal charges.

Academy reserves the right to change, extend, revise, revoke, or continue this policy upon approval of the Board of Directors.