Academy Sports + Outdoors Ethics and Code of Conduct Policy

The Playing Field and Rules of the Game
THE TEAM’S VISION, MISSION, AND PRINCIPLES

Academy Sports + Outdoors ("Academy" or "Company") is one of the largest and most successful sporting goods, outdoor, and lifestyle retailers in the United States. Our philosophy always has been to play hard, play fair, and play to win. We believe that the key to our success is combining the entrepreneurial spirit upon which our Company was built with a culture centered on making good decisions and doing the right thing.

Our vision is to be the premier sports, outdoor and lifestyle store of choice by continuously adapting to our customers’ changing needs.

Our mission is to:

- Deliver an unparalleled shopping experience by:
  - Providing convenience;
  - Offering a broad selection of quality products;
  - Delivering exceptional customer service; and
  - Selling at everyday low prices.

- Know our customers.
  - Our customers are our #1 priority as we strive to be the retail destination they can trust.

- Respect our associates.
  - Create opportunities for personal growth and career advancement while promoting teamwork in an enjoyable and rewarding environment.

Our principles are honesty, fairness, and respect.

Academy has built its reputation as the premier sporting goods retailer by adhering to a basic set of principles: honesty, fairness, and respect. Our commitment to these principles has created an environment where associates enjoy working for us, suppliers and vendors feel confident in partnering with us, and customers develop loyalty that keeps them coming back to our stores. This Ethics and Code of Conduct Policy ("Policy") captures our business vision, mission, and philosophy and provides us with important direction on how we should conduct business each and every day. All associates and vendors, suppliers, consultants, agents, accountants, law firms, public relations firms, contractors and other service or merchandise providers ("Business Partners") should review and follow this Policy.

Academy posts the most recent edition of this Policy on our internal website, and it is available upon request to any associate. Academy may amend the Policy as necessary, and all amendments are effective immediately upon posting. It is your responsibility to review the Policy from time to time to ensure that you are in compliance.
**BASIC GROUND RULES**

While it is easy to talk about doing business honestly, fairly, and respectfully, and about striving for great customer service, it is sometimes more challenging to put these principles into practice. This Policy is meant to help associates do just that — put our ethical principles into practice and make them part of our everyday routine.

To put our ethical principles in play, Academy expects all associates to follow these ten basic ground rules:

1. Follow the law at all times;
2. Always act in the best interest of Academy;
3. Avoid conflicts of interest between work and personal affairs;
4. Do not discriminate against anyone;
5. Protect confidential and proprietary information;
6. Lead by example and avoid the appearance of ethical misconduct;
7. Use Academy assets only for Academy business;
8. Do not offer or accept anything of value given to obtain an unfair advantage;
9. Seek help if you have any questions about ethical or code of conduct issues; and
10. Report suspected ethical and code of conduct violations.

These basic ground rules govern our field of play and set the foundation for our overall ethics approach.

**KNOW THE RULES**

Academy is not a company inundated with rules and regulations, but in addition to this Policy, Academy has standard operating procedures and other policies to provide guidance and direction on various aspects of the business, including employment, respect in the workplace, attendance, solicitation, dress, and public communications. Some of these policies and procedures may overlap with your obligations under this Policy. Regardless of whether the policies overlap, all associates have an obligation under this Policy to comply with all other Academy policies and procedures. These policies and procedures are continually updated and maintained by Human Resources. Academy encourages you to periodically review these policies and procedures to ensure that you are playing by all the rules.
PRE-GAME PREPARATION

Who is covered by Academy’s Ethics and Code of Conduct Policy?

Academy’s Ethics and Code of Conduct Policy applies to all Academy associates and Board members, and all associates of Academy’s subsidiaries and affiliates.

Academy also expects Business Partners to act ethically and consistent with this Policy. All associates responsible for Academy’s business relationships should take reasonable steps to ensure that each Business Partner has a reputation for integrity and acts in a highly ethical and professional manner.

Who is responsible for updating and maintaining the Policy?

The Ethics Committee and Human Resources will be responsible for updating and maintaining the Policy. This committee shall consist of Academy’s Chief Financial Officer, General Counsel, executive responsible for Human Resources, and other associates as appointed by the Executive Committee.

What is my responsibility as an associate?

As an associate, you are responsible for:

- reading, understanding, and following this Policy;
- applying this Policy to your specific job duties;
- seeking help if you have any questions about this Policy;
- cooperating with any investigations involving the Policy;
- reporting any violations or suspected violations of the Policy.

As a management associate (which includes any associate with direct reports), you are also responsible for:

- reviewing this Policy with your direct reports;
- instructing your direct reports on how to apply this Policy in their jobs;
- encouraging open communication on issues related to the Policy;
- addressing ethical issues among direct reports effectively;
- appreciating, and never retaliating against, associates who raise ethical issues.
What happens if I do not follow the Policy?

Academy takes ethical responsibilities seriously, and compliance with this Policy and other Academy policies and procedures are a term and condition of employment. Any associate violating this Policy may receive disciplinary action up to and including termination. This includes associates who fail to report violations and suspected violations of this Policy, make a false report of a Policy violation, or refuse to cooperate or provide false information during an investigation into an alleged Policy violation.

Can I get a waiver from complying with the Policy?

Academy believes that this Policy provides an important framework for how the Company conducts business. As a result, associates should not expect Academy to approve exceptions to the Policy. If you believe that individual circumstances warrant an exception, you can ask the Ethics Committee for a waiver, and it will consider your request.

REPORTING CONCERNS

What do I do if I have an ethics or code of conduct concern?

One of your most important responsibilities as an Academy associate is to report any concerns that you may have about a possible violation of Academy's Ethics and Code of Conduct Policy, other Company policies or procedures, or the law. If you are reluctant to raise a concern, please remember that you can harm Academy and your fellow associates by remaining silent. For this reason, Academy requires all associates to report any known or suspected violations of the law, the Policy, or other Company policies and procedures.

How do I report a concern involving Academy's Ethics and Code of Conduct Policy?

You may report possible violations of Academy's Ethics and Code of Conduct Policy, other Company policies or procedures, or the law through any of the following avenues:

- **Your Manager:** Academy has an open door policy, and the most direct way to report an ethical concern is to engage your immediate manager. If your concern involves your immediate manager, then report the concern to the next level of management that you believe is not involved or use one of the other reporting avenues described below.

- **General Counsel:** You can always report any ethical concerns to the General Counsel or anyone on the Legal staff.

- **Human Resources:** You can always report any ethical concerns to the head of Human Resources or the Human Resource representative responsible for your area.

- **The Ethics Committee:** You can always report any ethical concerns to any member of the Ethics Committee.

- **Loss Prevention:** You can always report any ethical concerns to the head of Loss Prevention or anyone on the Loss Prevention staff.
● **Aware Line:** If you wish to report an incident or suspected violation, contact the Aware Line by phone at (888) 503-0808 or online at awareline.academy.com. You may remain anonymous if you choose to do so.

● **Written Concern:** If you wish to report an ethical concern in writing, either anonymously or not, you can send your concern to ethics@academy.com or to Academy Sports + Outdoors, 1800 N. Mason Rd., Katy, TX 77449, Attn: General Counsel.

Will someone retaliate against me for reporting a concern involving Academy’s Ethics and Code of Conduct Policy?

No associate who in good faith reports a concern about Academy’s Ethics and Code of Conduct Policy will be subject to retaliation for voicing their concern. Associates also may report concerns anonymously through the Aware Line.

What happens when I report an ethical concern?

Your report is sent to the General Counsel’s office for review, and the General Counsel’s office will then partner with the appropriate functional areas for investigation. For example, the General Counsel’s office may partner with Internal Audit for accounting or financial concerns; Loss Prevention for criminal concerns; Human Resources for employment concerns, etc. Once Academy completes the investigation, the General Counsel prepares an oral and/or written report to the Ethics Committee, which then may approve, reject, or revise the report. When the report is complete, the Ethics Committee provides the report to the Executive Committee member or members responsible for the areas subject to the ethical complaint, and then consults with each member to determine the action necessary to resolve the ethical concern.

To the extent possible, Academy will maintain the confidentiality of your report and the investigation at all times. If possible and if the situation warrants, the General Counsel’s office or another designee will share the results of the investigation with the person who initially made the report and seek their input on the resolution.

**TEAMWORK**

Associates should respect their teammates.

Academy believes that people work best in an environment free from harassment and discrimination, and that harassment and discrimination should not be part of Academy’s business. Our work environment should be free of harassment, discrimination, or other inappropriate conduct based on age, ancestry, national origin, citizenship, color, creed, disability, gender identity, marital status, pregnancy, race, religion, sex, sexual orientation, veteran’s status, membership in, application for membership in, or an obligation for performance in any federal uniformed service, or any other characteristic protected by federal, state, or local law.

To help create a positive and productive work environment, Academy provides Respect and Ethics training to all associates. This training covers not only conduct that may violate the law, but also conduct that may not violate the law but nonetheless runs afoul of Academy’s ethics and business
principles. This includes actions or behavior directed at a person or group that is rude, abusive, unprofessional, insensitive, demeaning, or intimidating. All associates are responsible for creating and maintaining a work environment free from harassment, discrimination, and other inappropriate behavior.

**Academy strives for a diverse team.**

Academy provides equal opportunity in recruiting and hiring, and in the terms, conditions and privileges of employment, and we do so without regard to age, ancestry, national origin, citizenship, color, creed, disability, gender identity, marital status, pregnancy, race, religion, sex, sexual orientation, veteran’s status, membership in, application for membership in, or an obligation for performance in any federal uniformed service, or any other characteristic protected by federal, state or local law.

Academy works to build diversity and sensitivity to diversity into our basic culture. We require that our associates treat all other associates, and all visitors, customers, Business Partners, and any other person with whom our associates interact, fairly, equally, and respectfully.

The variety and individuality of our associates, customers, and all others with whom we interact enhance the quality of our work environment and our customers’ shopping experience.

The safety and health of the team is vital.

Academy is committed to providing a safe and healthy work environment and to being an environmentally responsible corporate citizen. We comply with all environmental, safety, and health laws and regulations. You should report any condition that you believe threatens the safety or creates a hazard to our associates or their environment. Academy works to minimize the impact of our business on the environment with methods that are socially responsible and economically sound.

Academy expects its Business Partners to meet the same standards of conduct as team members.

Academy expects its Business Partners to observe the same standards of conduct as Academy associates when conducting business with or for Academy. No associate may indirectly, through a Business Partner, do anything that the associate is prohibited from doing under this Policy.

Academy wants its team to be socially responsible.

Academy expects its team to be socially responsible in its business practices, and we expect our Business Partners to do the same. One way that we promote social responsibility is through our Global Sourcing Guidelines & Code of Vendor Conduct, which govern Business Partners who provide merchandise for Academy. These guidelines require our Business Partners to respect the rights of associates, minimize their impact on the environment, provide a safe and healthy workplace, and follow all applicable laws and regulations.
PROTECTING TEAM STRATEGY AND EQUIPMENT

All associates are responsible for protecting Academy’s information, ideas, and intellectual property.

As an Academy associate, you may have access to confidential and proprietary information about the Company. Confidential information includes, but is not limited to, strategic plans, sales data, financial information, product designs, contracts, market research, vendor information, associate information, software, trade secrets, patents, trademarks, copyrights, other intellectual property, and similar information from Business Partners. Because Academy’s business is highly competitive, disclosing confidential information could result in severe damage to the Company. For this reason, Academy expressly prohibits disclosing confidential information to any person or organization, directly or indirectly, without Academy’s prior written consent, or using confidential information for any reason other than in furtherance of Academy’s business. This includes not only intentional disclosures, but negligent and mistaken disclosures as well. Associates should protect all confidential information and ensure that it is not disclosed or otherwise put in the public domain through a lack of care.

Any invention, discovery, development, concept, idea, process, or work related to Academy’s business, written or otherwise, whether or not it can be patented or copyrighted, that you develop alone or with others during your employment (“Academy Inventions”) belongs to Academy. As a condition of your employment, you assign exclusively to Academy all of your rights, title and interest in Academy Inventions. You also agree to assist Academy in obtaining intellectual property rights, including any patents and copyrights, in the Academy Inventions and agree to deliver any documents that may be requested to assure, record or perfect your assignment of Academy Inventions to Academy.

All associates are responsible for producing and maintaining accurate records, data, and reports.

Academy’s financial statements must fairly and accurately present the financial condition of the business. As a result, Academy associates are responsible for producing and maintaining accurate and complete records, data, and reports, and for properly recording Company transactions. Associates may not make any false or misleading statements, entries, or omissions in any of Academy’s books, records, or other documents or communications. Our goal is to strive for accuracy, completeness, and clarity in all of our Company information.

Academy’s record-keeping policies include rules for document retention and destruction. Notwithstanding any other provision of Academy’s document retention policies, no document or record may be destroyed if you have been advised or otherwise should recognize that it may be relevant to a pending or threatened legal or regulatory proceeding, except in accordance with procedures approved by the General Counsel.
All associates are responsible for safeguarding Academy assets.

It is the responsibility of every Academy associate to safeguard Academy's assets and to report any suspected misappropriation. Academy's assets includes, but are not limited to, physical assets, books and records, computer and information resources, and intellectual property. Associates should use and maintain assets with care and respect while guarding against waste and abuse. Associates should also avoid using Academy assets for unauthorized or personal use except where reasonable personal use is permitted under this Policy or other applicable policies.

All associates are responsible for using good judgment in electronic communications.

Telephones, email systems, and other electronic communications devices provided by Academy, whether in the workplace or elsewhere, are the property of Academy, and associates should avoid using Academy's electronic assets for personal use except where reasonable personal use is permitted under this Policy or other applicable policies. Academy considers all data and communications transmitted through, received by, or contained in the Company's electronic or telephonic systems to be Academy property, and Academy reserves the right to monitor, review, and disclose all such data and communications as it deems appropriate. You should have no expectation of privacy when using Academy's electronic or other resources.

Academy also expects you to use common sense and good judgment in determining what is and what is not “reasonable personal use,” but the following use is prohibited under any circumstances:

- making statements or sending material violating any of our policies, including our Public Communications Policy; and
- accessing, downloading, uploading, saving, or sending sexually oriented or other offensive materials.

All associates are also responsible for their public statements, including any statements made to a third party or entity, whether written or oral, by any means, including social media such as Facebook and Twitter. Public statements include pictures, images, videos, recordings, sound files, attachments, posts, and any other means where information about you or Academy is made available to any third party or entity. Your public statements reflect upon both you and Academy, so please follow Academy’s Public Communications Policy and use good judgment when making public statements about Academy and yourself.

Academy protects associate, Company, Business Partner, and customer information.

Academy uses a variety of security measures to protect associate, Company, Business Partner, and customer information. Associates are responsible for protecting such information by safeguarding it and limiting its use to only that which is required for your job. Associate, Company, Business Partner, and customer information should not be used for personal benefit or the benefit of others.
Academy empowers its associates, but also expects them to know the limits of their authority.

Your authority to act on behalf of Academy is limited by various laws, regulations, corporate restrictions, and internal policies and procedures. You may not sign any documents, or otherwise represent or exercise authority, on behalf of any Academy entity unless you are specifically authorized to do so. Please be aware of limits on your authority and do not take any action that exceeds those limits.

THE PLAYING FIELD: WHAT’S FAIR AND WHAT’S FOUL

Academy’s core principles are honesty, fairness, and respect, and its culture is based on making good decisions and doing the right thing. To follow these beliefs, it is critical that our associates make business decisions based on what is best for Academy, such as price, selection, quality, value, and service. We want to avoid even the appearance of making business decisions based on any improper factors. For this reason, each associate should have a clear understanding of the playing field – the rules governing how we make business decisions at Academy, and what we consider fair and foul play.

Gifts, gratuities, samples, donations, favors, and other goods, services, or benefits exchanged for less than their fair market value.

Academy understands the delicate balance between avoiding the appearance of impropriety through the exchange of gifts or benefits, and the important role that such exchanges can play in relationship building and other aspects of our business. In certain cases, gifts and benefits are a necessity, such as product samples for merchandising, food and drink for business meetings, and activities for relationship building. In other cases, gifts and benefits cross the line and become a material and improper influence on decision making. Our goal is to draw this line carefully so that associates can operate their business effectively while at the same time avoiding situations that may put their judgment and Academy at risk.

Academy defines Gifts for purposes of this Policy as anything of value given, received, or exchanged for less than fair market value or the usual and customary cost. This includes, but is not limited to, gifts, gratuities, samples, donations, favors, travel, meals, and entertainment. In addition, Academy considers Gifts given by others to members of your family, to those with whom you have a close personal relationship, or to charities designated by you to be Gifts to you for purposes of this Policy.

Foul Ball: Prohibited Gifts

Academy prohibits the following Gifts under all circumstances:

- any Gift of cash or cash equivalent (for example, gift cards or gift certificates);
- any Gift solicited by the associate for personal benefit (or the benefit of anyone else);
- any Gift provided with any expectation of a return favor, regardless of the value of the Gift or who the Gift benefits;
• any Gift with a fair market value exceeding $1,000, without the written consent of the Ethics Committee (via the Disclosure Form at awareline.academy.com) and the Executive Committee member responsible for your business;

• any Gift intended to improperly influence an associate’s business judgment.

Associates must report all Prohibited Gifts to the Ethics Committee (via the Disclosure Form at awareline.academy.com), and return all non-compliant gifts to the original provider.

**Fair Ball: Allowable Gifts**

Academy allows Gifts in certain circumstances where such Gifts are unsolicited and infrequent, and meet the following criteria:

1. **Business Entertainment.** Academy allows Business Entertainment, which is meals, travel, or entertainment where (a) the purpose is business-related; (b) your attendance is consistent with your duties at Academy; (c) your host is present; and (d) the value of the entertainment is reasonable and customary in the context of your business, and has a fair market value that is:
   - less than $200;
   - greater than $200 but less than $1,000, provided that it is properly disclosed in advance to the Ethics Committee (via the Disclosure Form at awareline.academy.com) and the Executive Committee member responsible for your business; or
   - greater than $1,000 only with the prior written consent of the Ethics Committee (via the Disclosure Form at awareline.academy.com) and the Executive Committee member responsible for your business.

2. **Recognition Gifts.** Academy allows Recognition Gifts, such as holiday gift baskets, achievement awards, vendor trinkets, deal toys, etc., as long as the Gifts are customary under the circumstances and have a fair market value of less than $100. Where possible, recipients of Recognition Gifts should share these Gifts with their respective functional groups.

3. **Samples.** All sample merchandise must be handled in accordance with the Sample Policy.

4. **Tickets.** Academy allows the acceptance of tickets for sporting events and entertainment where the Business Partner providing the tickets will not be present so long as:
   - the tickets qualify as Business Entertainment under this Policy in all other respects except the requirement that the host be present; or
b. Academy receives the tickets in the normal course of business, and you receive the tickets from an authorized Academy representative responsible for distributing such tickets.

All tickets to major events that might not otherwise be available to the general public (for example, the Super Bowl, World Series, etc.) must be approved in advance by the Ethics Committee (via the Disclosure Form at awareline.academy.com) and the Executive Committee member responsible for your business. Associates may not resell tickets provided by Academy or Business Partners for cash or other consideration.

If there are any questions regarding the value of a Gift or the applicability of the Policy, it is the associate’s responsibility to resolve such questions by consulting with the Ethics Committee at ethics@academy.com or the Executive Committee member responsible for your business prior to accepting such Gift. Further, associates may include their spouses in Business Entertainment provided that spouses are invited and their attendance is customary for the event. Associates should not, however, substitute friends and other family for their spouse. Instead, if multiple opportunities are available for Business Entertainment, those opportunities should be made available to other Academy associates before friends and family who are not employed by Academy.

Complying with the Law

Academy expects all associates to comply with all applicable laws, rules, and regulations, and report suspected violations. Academy expects all associates to comply with Academy’s Foreign Corrupt Practices Act Policy and Procedures and the Foreign Corrupt Practices Act, the U.K. Bribery Act and similar laws in other countries, and the mandates of the Organization for Economic Development (OECD), the Council of Europe Criminal Law Convention on Corruption and the United Nations Convention against Corruption.

Bribes and Improper Payments

Academy strictly prohibits bribes and kickbacks, which include offering, promising, or paying anything of value, directly or indirectly, to any person, company, government official or employee, political party, candidate for public office, or other entity for the purpose of obtaining an improper business advantage. The fact that bribery may be an accepted local practice in a country does not relieve Academy associates of their ethical obligations under this Policy.

Conflicts of Interest

Academy recognizes and respects the rights of associates to take part in financial, business, employment, or other activities outside of their Academy jobs. These activities, however, must be lawful and free from any potential conflicts of interest with the associate’s responsibilities at Academy. Conflicts of interest arise when an associate uses his/her position at Academy for personal gain or when the associate’s personal interests conflict with Academy interests. Associates must avoid any actions or relationships that could conflict with, or appear to conflict with, the interests of Academy. This includes, but is not limited to:
● acting on behalf of Academy in any transaction or business relationship involving yourself, members of your family, or other persons or organizations with which you or your family have any significant personal connection or financial interest;

● accepting or soliciting any personal benefit from someone doing business or seeking to do business with Academy that is not generally available to other persons or that is made available to you due to your position at Academy (except in accordance with our Policy regarding Gifts);

● loaning money to, or borrowing money from, individuals or companies that do business with or compete with Academy, except transactions with banks or other financial institutions in accordance with normal business practices;

● taking a business opportunity for yourself that belongs to Academy; and

● engaging in a business that competes with Academy.

Associates may maintain concurrent employment outside of Academy provided that such employment complies with this policy and other Company policies, does not create scheduling conflicts, and does not affect your objectivity or ability to carry out your duties at Academy. Associates engaging in concurrent employment also may not conduct activities for another employer on Academy time or with Academy resources, or solicit Academy associates for purposes related to another employer.

While associates may engage in passive personal investments and charitable or public service activities, associates may not work for, or serve as a director or officer of or adviser to, a competitor or Business Partner of Academy without the written consent of the Ethics Committee. Associates also may not hold a material financial interest in a competitor or Business Partner without the written consent of the Ethics. Academy does not consider ownership of less than two percent (2%) of a publically traded company to be a material financial interest. Financial interests in competitors or Business Partners held through mutual funds or similar investment funds are also acceptable as long as the associate does not control the fund’s investment decisions.

Outside activities must not interfere with your job performance or require such long hours as to affect your physical or mental effectiveness. Your job at Academy must always be your first work priority.

**Insider Trading**

While working at Academy, you may become aware of material non-public information about Academy or other companies that is not available to the public. “Material” information includes any information that would influence a reasonable investor to buy or sell the stock of another company having a current or prospective material business relationship with Academy. The use of material, non-public information by associates for their own financial benefit or that of a spouse, relative, or friend is a violation of this policy and the law.

**Antitrust and Competition**

Academy competes fairly and vigorously everywhere we do business. As a result, we expect all Academy associates to comply with antitrust and competition laws throughout the world. Antitrust
laws prohibit agreements or understandings among actual or potential competitors to control prices, fix bids, boycott specific suppliers or customers, or limit the production and sales of product lines. Other laws prohibit misrepresenting our own products or services, stealing trade secrets, or offering or paying bribes or kickbacks.

Political Activity and Contributions

If an associate wishes to volunteer for a political campaign, you must do so on your own time and as an individual, not as a representative of Academy or any of its affiliates. You also may not use Academy resources for political purposes, including staff, facilities, email, equipment, supplies, and mailing lists. Finally, you must refrain from contacting other associates during work hours or on Academy premises to solicit political contributions, promote specific campaigns, or seek political volunteer activity. These prohibitions do not apply to solicitations by any Academy-sponsored political action committees or to candidate events, fundraisers, and other activities organized by Academy.

All associates have the right to participate in the political process by making personal contributions from personal funds, subject to applicable legal limits. Academy, however, cannot reimburse you for any such contribution. In considering political contributions, please remember that it is improper to offer or give anything to a public official, either directly or through an intermediary, in an effort to secure an advantage that would not have been granted if the offer or gift had not been made.

Political contributions by corporate entities are strictly regulated by laws at the federal, state and local levels. Academy does not authorize any associate to make political contributions of any kind on behalf of Academy without the written authorization of the Ethics Committee and General Counsel. Academy also does not authorize any associate to engage in lobbying activities, including the retention of outside lobbyists, without the written authorization of the General Counsel.

**DISCLOSURE: LETTING THE TEAM KNOW ABOUT POTENTIAL CONFLICTS**

The best way to ensure compliance with Academy’s Ethics and Code of Conduct Policy is to properly disclose in a timely manner any potential ethical issues, conflicts of interest, and other concerns, and seek guidance as necessary from your manager, Executive Committee member responsible for your business, or the Ethics Committee.

What do I have to disclose?

While it is impossible to disclose everything that may, under the letter and spirit of the policy, require disclosure, it is mandatory that you disclose the following:

1. **Gifts**
   - any gifts violating the policy, including the identification of the giver and receiver; and
   - any gift where disclosure is required for acceptance.

2. **Conflicts of Interest**
• any actual or potential conflicts of interest, such as receiving personal benefits from someone seeking to do business with Academy, taking an Academy business opportunity for yourself, or engaging in business with a competitor;

• any family members, relatives, or other persons involved in a transaction or business relationship with Academy, where the nature of your relationship with such persons could reasonably create a conflict of interest;

• any outside activity, including concurrent employment, that may present a conflict of interest or the appearance of a conflict under this policy;

• any associate purchased merchandise, including samples or merchandise purchased with an employee discount, listed for resale, where the associate appears to be competing with Academy or otherwise abusing the sample sale procedures and associate merchandise discount policy;

• any affiliation with or ownership of a competitor or Business Partner that may present a conflict of interest or the appearance of a conflict under this policy; and

• any government position, whether paid or unpaid, elected or appointed, including as an elected official and as a member, director, officer, or employee of a governmental agency, authority, advisory board, or other board.

3. Violations of the Law or Academy Policy, including this Ethics Policy and Academy’s Global Sourcing Guidelines and Vendor Code of Conduct

• any violations of the law or Academy Policy, including but not limited to this Ethics Policy and Academy’s Global Sourcing Guidelines and Vendor Code of Conduct.

To whom do I disclose potential conflicts?

For anything requiring disclosure under this policy, you must notify the Ethics Committee. Academy also may require disclosure to your manager or the Executive Committee member responsible for your business.

What happens after I disclose a potential conflict?

The Ethics Committee and your management team will assess the potential conflict and determine whether it is allowable under Academy’s Policy.

QUESTIONS ABOUT THE GAME?

Academy recognizes that any ethics policy will raise questions and sometimes present difficult choices. When in doubt, remember that Academy’s culture stresses making good decisions and doing the right thing. The Academy culture also fosters an open door policy where associates are
encouraged to ask questions and raise concerns. If you have any questions about this policy or any other Academy policies, you can speak with a member of your management team or any member of the Executive Committee or Ethics Committee, or use any of the available reporting mechanisms. Academy believes in achieving success with honesty, fairness, and respect, and we ask our associates to follow this policy to help make Academy an exceptional place to work.