



NATIONAL FOOTBALL LEAGUE
Respect – Integrity – Responsibility to Team – Resiliency

Dear NFL Colleague:

The National Football League is proud to be America's most popular and respected sports league. As stated in the NFL Mission and Values, we must maintain an environment that inspires confidence and trust among our colleagues, Clubs, business partners, fans, and the public. We do this by always exemplifying our core values:

Respect requires that we honor hard work and treat everyone fairly and with dignity.

Integrity means that we always look to make the right call.

Responsibility to Team means that we support each other to do the right thing.

Resiliency requires that we strive for excellence, overcome obstacles, and find solutions.

The Compliance Plan puts our values into practice. It requires each of us to adhere to business practices and procedures that comply with the law and reflect the highest level of integrity. Among other requirements, this means every colleague must recognize and avoid activities and relationships that may conflict – or appear to conflict – with the NFL's best interests.

The Compliance Plan lays out principles we must all observe, sets forth policies on common scenarios employees may confront, and describes how employees can seek guidance and – where necessary – approval from the NFL's Compliance Officers. Each year, we are all required to certify that we have reviewed and followed the Compliance Plan. From time to time, we are also required to complete Compliance Plan trainings.

Our Compliance Officers should be advised promptly of any information concerning possible violations of the law or this Compliance Plan by any employee of the NFL. A violation of the Compliance Plan or the law, including failure to report observed or known instances of such activity, is subject to disciplinary action, up to and including termination of employment. Retaliation against a person who reports a violation or assists in the investigation of a reported violation will not be tolerated.

With your commitment to these principles and values, we can all be leaders and continue to put the NFL in the best position to successfully serve our fans, Clubs, and business partners and to maintain its reputation as one of its strongest assets. Thank you for your cooperation and for your continuing contributions to the success of the NFL.

A handwritten signature in black ink that reads 'Roger Goodell'.

ROGER GOODELL
Commissioner

June 2025

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STATEMENT OF POLICY

I. INTRODUCTION

The National Football League is committed to conducting business with the highest level of integrity and to complying with federal, state, and local laws and regulations that apply to the operation of its business in the United States and other countries. The reaffirmation of the NFL's established principles and standards may impose requirements that are often more exacting than those mandated by law, especially in light of our high visibility and outstanding reputation.

Compliance risks can arise while performing routine responsibilities; for example, engaging in transactions with the NFL's business partners, communicating with and managing other NFL employees, handling non-public information concerning players, games, or the business, and maintaining NFL books and records.

Compliance risks can also arise when an employee has a conflict of interest. A conflict of interest exists whenever an employee's actions on behalf of the NFL might be, or could appear to be, affected by considerations other than the best interests of the NFL, even if such actions are lawful. Accepting significant gifts from business partners, providing services to another organization, or serving on boards, to name three examples, could be considered a conflict of interest.

We expect our business partners to adhere to the same standards in their dealings with us, as well as with others on our behalf, because some may seek to attribute the actions of our business partners to the NFL.

No employee should involve the NFL in any situation in which the NFL could be deemed to have assisted or aided in the commission of a crime or violation of law. If any employee has information of suspected criminal or illegal activity by another employee or by a business partner, such information should be reported in accordance with the reporting provisions set forth in Section II of this Plan.

Following this Statement of Policy are: (1) a description of employee reporting requirements, reporting resources, and investigation and disciplinary processes, including protection against retaliation; (2) a review of policies that address common Compliance scenarios employees may confront, including when employees should seek guidance or – where necessary – approval from a Compliance Officer; and (3) summaries of other key League policies.

II. REPORTING AND INVESTIGATING POSSIBLE VIOLATIONS; DISCIPLINE

A. Applicable Policies and Obligation to Report

At all times, you are expected to comply with all League Office policies, including:

[Compliance Plan](#)

[Gambling Policy for NFL Personnel](#)

[Personal Conduct Policy](#)

[Employee Handbook](#)

[Information Security Policy](#)

[Artificial Intelligence Policy](#)

Access League Office Policies: Policies can be found on [Playbook](#) or by contacting a [Compliance Officer](#).

You are expected to report any information you have regarding a violation of the above policies and/or suspected criminal wrongdoing or violations of law by any employee or agent of the NFL. The NFL requires all employees to come forward with such information, without regard to the identity or position of the suspected offender. Information must be reported promptly, and we ask that you provide as much detail as possible concerning the matter.

Because failure to report improper or criminal activity can itself be understood to condone the activity, we emphasize the importance of reporting. Failure to report knowledge of illegal conduct and/or violations of this Compliance Plan or other League Office policies may result in disciplinary action against those who fail to report.

B. How to Report Violations of the Compliance Plan or Other League Office Policies

Report to a Compliance Officer: You are expected to report violations of the Compliance Plan or other League Office policies to an NFL Compliance Officer, who are employees designated to administer the Compliance Plan and address inquiries, disclosures, and potential violations. Employees may visit, call, or email a Compliance Officer using the information provided below.

Sabrina Perel
VP, Chief Compliance Officer
(212) 450-2390
Sabrina.Perel@nfl.com

Nick Macri
Director, Compliance
(212) 450-2458
Nick.Macri@nfl.com

Report to Other League Personnel: If you are more comfortable reporting to the head of your department, or anyone else in a position of responsibility, please feel free to do so. You may also contact Human Resources or the Legal Department. What is important is that you make the report.

Anonymous Reporting: If you would prefer to ask a question, raise a concern, or report a potential policy violation *anonymously*, you may do so by accessing the [NFL Ethics Hotline](#).



C. Investigations of Possible Violations and Discipline

Reports of possible violations will be investigated under the supervision of a Compliance Officer utilizing other NFL resources, including Human Resources, Internal Audit, or the Security Department, when necessary. Employees are expected to cooperate in the investigation of reported violations and to provide all information and materials as requested. In addition, employees are expected to abide by all instructions regarding the investigation and maintain confidentiality.

Confidentiality: To the extent practical and appropriate under the circumstances, the NFL will protect the privacy of the individuals involved. However, employees should be aware that Compliance Officers and those assisting them are obligated to act in the best interests of the League and accordingly, confidentiality cannot be guaranteed.

Protection Against Retaliation: Retaliation in any form against an individual who reports a violation of the Compliance Plan or other League Office policy or who assists in the investigation of a reported violation is itself a serious violation of the Compliance Plan. Acts of retaliation should immediately be reported to your manager, a Compliance Officer, Human Resources, the Legal Department, or the [NFL Ethics Hotline](#) so that appropriate action may be taken.

NFL Response and Discipline: All employees regardless of employment status (*e.g.*, full-time, part-time, seasonal, intern, or other status) are expected to adhere to the Compliance Plan and all other League Office policies. The NFL will respond promptly and appropriately to policy violations. After appropriate investigation, if a Compliance Officer establishes that the Compliance Plan or another League Office policy has been violated – whether by unethical or unlawful actions, condoning or failing to report information as to inappropriate or illegal actions by others, failing to cooperate in or assist with an investigation, or retaliating against those who report suspected wrongdoing or otherwise – appropriate discipline may result, up to and including termination of employment. Where permitted by applicable law, the NFL may seek to recoup compensation from employees who have engaged in policy violations. The NFL further reserves the right to commence civil proceedings or initiate criminal proceedings if, in its sole discretion, it deems such action appropriate in light of the violation established.

When necessary, the NFL may also update the Compliance Plan or other policies to better detect and deter such violations in the future.

III. POLICIES THAT ADDRESS COMMON COMPLIANCE SCENARIOS

The following policies address common Compliance scenarios that may require an employee to seek guidance, make a disclosure, or – where necessary – obtain approval from a Compliance Officer.

Compliance Answers: New for 2025, you can contact a Compliance Officer through [Compliance Answers](#), a resource that allows you to seek guidance, make a disclosure, or request approval by completing an intake form. You can also correspond with a Compliance Officer by contacting ComplianceAnswers@nfl.com.

A. Honesty and Fairness

Integrity begins with each of us acting with honesty and fairness – whether interacting with outside organizations or colleagues. As such, we should always adhere to the following standards when engaging with others on the NFL’s behalf:

- Never make misrepresentations, dishonest statements, or statements that may mislead or misinform. If it appears that anything you have said or written has been misunderstood, correct it promptly.
- Never use the NFL’s success or size in an effort to coerce or threaten another organization. Although you may cite legitimate advantages of doing business with the NFL, you must be careful not to engage in any activity that could be construed as coercive or threatening.
- Never disparage a competitor, its products, or its services. Rather, stress in a fair and accurate manner the advantages of the NFL’s products and services.

B. Confidentiality

During your employment with the NFL, you may become aware of non-public information related to the NFL. Never disclose non-public information to anyone outside of the NFL, either directly or indirectly, or to anyone who is or could be adverse to or competitive with the NFL, unless authorized to do so. You also should not discuss or share non-public information with colleagues unless they have a need to know the information.

“Non-public information” includes, but is not limited to, information obtained by virtue of your role with the NFL that is confidential or has not been disseminated to the public at large. “Non-public information” can take many forms, including: business plans, financial data, or information about League Office and Club executives; NFL-related projects and ventures, including licensing, sponsorships, and media rights; player information, including transactions, discipline, health and safety data, and NFL Draft selections; and game information, including Officiating information and replay decisions.

This prohibition applies even after you leave your employment with the NFL, to the extent permissible by law. Compliance with this policy is critical to our efforts to ensure NFL, player,

and Club information is not used for improper purposes, including gambling, and protects the integrity of our game.

Compliance Tip: If you are unsure whether certain information is “non-public” and thus should not be discussed with others, speak with your manager or reach out to a Compliance Officer for guidance.

Any breach or threatened breach of this policy may result in disciplinary action for current employees, up to and including termination of employment. The NFL may also pursue injunctive relief or other remedies available in law and/or equity for both current and former employees or any individuals covered by this policy, as the NFL expressly reserves all rights and remedies.

Any unauthorized or inadvertent disclosure of non-public information of which an employee becomes aware should be reported immediately.

C. Accurate and Complete Records

The League’s commitment to integrity requires that we maintain accurate business records.

All NFL information you maintain in the course of our job function must be recorded accurately, completely, and in a timely manner. This includes:

- **Business Transactions:** Never make false or artificial entries in the NFL’s business or financial records. Never understate or overstate reports of sales or expenses, or alter any documents used to support those reports. All assets and liabilities must be recorded in the regular books of account. Use the best available information for any estimates and ensure that you can support any assumptions made.
- **Requests for Travel and Expense Reimbursement:** Requests for travel and expense reimbursement should be submitted and approved accurately, completely, and in accordance with the [NFL Travel & Expense Reimbursement Policy](#). Expense reports that contain intentionally altered receipts or other documents, or improper items – including requests for reimbursement of non-business expenses – will be considered in violation of this policy – and the fraud policy.
- **Employee Timekeeping and NFL Workplace Policy:** All employees must record their time accurately. Non-exempt employees must accurately record hours worked, in accordance with the requirements of the [Employee Handbook](#). Pursuant to the [NFL Workplace Policy](#), full-time and seasonal full-time employees must accurately record days worked.
- **Requisitions:** When committing the NFL to use suppliers for goods or services, employees must follow the procedures outlined in the [Requisition Training](#) and found on [Playbook](#). Employees are further subject to the [Contract Management Policy](#) ([Section III.K](#) below). Purchase orders are expected for the majority of committed expenses. Payments will not be processed without evidence of an approved purchase order. For the purchase of physical goods, employees must verify that the physical goods were received prior to invoice payment in accordance with the Requisition Training. Each requisition and invoice initiated in the Oracle financial system requires the approval of a director or above (based

on dollar limits set within Oracle). Instructions on how to review requisitions and invoices can be found in the [Approvals Requisition and Invoice Training](#).

Failing to maintain accurate and complete records, or falsifying records, is a violation of this policy.

D. Fraud

Each of us is expected to adhere to the highest ethical and professional standards in carrying out our responsibilities as NFL employees. As such, fraud and any related misconduct will not be tolerated.

Definition of Fraud: Fraud is defined as any knowing misconception or misrepresentation of the truth or concealment of a material fact to induce another to act in his or her detriment or to deceive a party, including the NFL.

A non-exhaustive list of examples of fraud includes: recording inaccurate NFL financial or business data, submitting altered documents when requesting travel and expense reimbursement, logging hours that you did not work or not in compliance with the [NFL Workplace Policy](#).

Employees found to have engaged in fraud of any form may face termination of employment or other discipline, recoupment of money or assets fraudulently obtained, and possible criminal and civil liability.

Employees Have an Affirmative Obligation to Report Fraud. Reports may be made to your department head, a Compliance Officer, or a member of the Internal Audit staff.

Compliance Scenarios:



I submitted five parking receipts totaling \$150 in a recent travel and expense report. I submitted all five receipts for reimbursement when, in fact, two of the parking receipts were for personal trips. Is this fraud?

While in Houston for NFL business, I placed an Uber Eats order for food to be delivered to my home in New York City for my roommates to eat. I submitted the Uber Eats expense for reimbursement as a travel meal, as I had not reached the Travel & Expense Policy's daily maximum allowance for personal meals. Is this fraud?

Yes, both scenarios are fraud. Fraud is defined as a knowing misrepresentation of the truth. Having the NFL reimburse you for expenses unrelated to your NFL work constitutes fraud.

What can happen to me? Pursuant to this policy, you could be disciplined up to and including termination of your employment with the NFL.

E. Anti-Corruption / Gifts and Hospitality for Government Officials

It is a violation of NFL policy to offer bribes and other improper advantages in connection with the activities of the NFL. As explained in the [NFL Anti-Corruption Manual](#), the NFL is committed to complying with all applicable anti-bribery and anti-corruption laws, including the United States Foreign Corrupt Practices Act (“FCPA”), the United Kingdom Bribery Act (“UK Bribery Act”), U.S. federal, state, and local anti-corruption laws for government officials, and anti-corruption laws in Australia, Brazil, Canada, China, Germany, Mexico, and any other countries in which the NFL conducts business.

NFL Bribery Prohibitions: The NFL has a zero-tolerance policy for bribery. No employee may, either directly or indirectly:

- Offer a bribe, kickback, or anything else of value to a government official, business partner, vendor, or supplier as an incentive to, or in exchange or as a reward for, obtaining an inappropriate business advantage for the League Office or a Club.
- Give, offer, solicit, or accept anything of value that is intended to induce the recipient to violate their duty of loyalty to their employer or otherwise perform any function or activity improperly.
- Offer, promise, or give any financial or other advantage to a government official or any other person while knowing or believing that acceptance of the advantage would itself be improper.
- Demand, agree to receive, or accept a bribe, kickback, or any other improper financial or other advantage.

Note: The NFL bribery prohibitions apply to all League Office personnel and Club personnel while working on international initiatives and events organized under the auspices of the NFL, such as International Games and the Global Markets Program.

NFL Vendors and Business Partners: Anti-bribery and anti-corruption laws and the NFL Anti-Corruption Manual also apply to individuals and entities that do business on behalf of the NFL. The NFL can be held legally responsible for the actions of its third-party representatives, including vendors and business partners. As a result, it is important to perform diligence on potential vendors and business partners who may interact with government officials on the League’s behalf. It is also important to ensure that contracts with such vendors and business partners include anti-corruption requirements and are performed in accordance with their terms and conditions.

Anti-Corruption Resources

- **[Anti-Corruption Manual](#):** Describes anti-corruption laws, states our policies and procedures designed to ensure your compliance with these laws, and provides examples of “red flags”, which will help you understand how corruption risks may arise in the course

of your everyday business, how to mitigate such risks – including when retaining vendors and business partners, and best practices concerning the offering of tickets and other gifts.

- **[Anti-Corruption Manual Control Forms](#)**: Forms designed to assist compliance with the *Manual*'s procedures, including diligence of vendors and business partners and requests to offer tickets to government officials.
- **[Anti-Corruption Resource Guide](#)**: Addresses key provisions of the *Manual* and explains how personnel can help mitigate corruption and bribery risks.

Tickets, Hospitality, or Gifts to Foreign and U.S. Government Officials

Gifts to government officials, employees, and civil servants in the United States and other countries may be subject to federal, state, and local laws, in addition to the gift and ethics rules of the official's government entity. Further, it is often illegal to give a government official anything of value for or because of their past or future action, even if not for corrupt purposes. Increased scrutiny is appropriate in circumstances in which the NFL has recently had – or will have – business before the official or their government entity.

Obtaining Approval to Offer Tickets, Hospitality, or Gifts to Foreign and U.S. Government Officials:

Prior to *offering* tickets, hospitality, or other gifts to a foreign or U.S. government official (whether federal, state, or local), you **must** obtain approval from a Compliance Officer.

When you reach out, a Compliance Officer will review the circumstances surrounding your proposed invitation or gift and whether it may be permissible under both anti-bribery laws and the internal rules and policies of the proposed invitee's government entity or agency.

You can submit a request to invite a government official to a game by completing the [Government Official Ticket Approval Form](#). When submitting your request to a Compliance Officer, you must confirm that the tickets are being provided to demonstrate or promote NFL football and are not intended to influence or reward a decision or action taken by a government official.

All employees, including those working on International Games and international marketing initiatives, must complete all mandatory Anti-Corruption trainings and should be familiar with and understand the *Manual*, including who is considered a government official and what might be considered an impermissible offer of tickets, hospitality, gifts, or anything else of value to a government official.

Compliance Scenarios:



Employees based in the London office would like to invite certain executives of a potential media partner, which is partially owned by the Spanish government, to a game in London so the potential partner can observe an International Game. What action is required before the executives may be invited?

I work in Events and have been asked to provide a complimentary Draft ticket to the mayor of the Draft host city. Can I provide this ticket?

Contact a Compliance Officer to seek approval BEFORE extending any invitation or providing a ticket to any government official, including the officials described above. By way of example, League employees should be prepared to discuss with a Compliance Officer the purpose of the invitation and any business the League has before the official's government entity, including the League's contacts with the official and their entity.

F. Conflicts of Interest

You should never engage in an activity that conflicts with the best interests of the NFL, or that gives the appearance of creating a conflict with the best interests of the NFL.

Definition of "Conflict of Interest": A conflict of interest is any situation in which an employee's actions on behalf of the League might be affected or influenced by considerations other than the best interests of the NFL. It typically arises when an employee has competing interests or loyalties that are, or could be, at odds with each other. Even if you are acting in the best interests of the NFL, the mere *appearance* of a conflict or other impropriety can be harmful to the NFL.

The sections below discuss common conflicts scenarios, outline Compliance Plan rules and best practices, and note when you must disclose the scenario and possibly seek guidance and obtain Compliance Officer approval. If you have any doubt as to whether your situation involves a conflict of interest or an appearance of impropriety, consult a Compliance Officer before proceeding. If you learn after the fact that a conflict exists, or if you previously were or currently are involved in a conflict of interest, you should promptly disclose it to a Compliance Officer so that it may be resolved appropriately.

Compliance Tip: Anything that would constitute a conflict of interest on the part of an employee is also unacceptable if engaged in through, or in benefit of, a third party, such as a spouse, family member, close friend, or any other person or entity with whom the employee is closely identified or in which the employee has any significant ownership or financial interest. For example, if a family member is on the board of directors of a League vendor or business partner, you may have a conflict of interest, which requires disclosure to a Compliance Officer.

1. Relationships

The following policies address conflicts that may arise from an employee's relationships.

- **Relatives Associated with an NFL Vendor or Business Partner:** Employees must disclose on their annual Compliance Plan Certification if any relatives work for or are associated with an NFL vendor or business partner. A Compliance Officer may reach out to you to discuss the circumstances. During the course of the year, please promptly

contact a Compliance Officer should your work overlap with the vendor or business partner – or a potential vendor or business partner – your relative works for, especially if your work implicates your relative.

- **Employment of Relatives:** The NFL maintains a very strict policy against hiring family members of current employees to also work for or to provide services to the League Office. Please review the Employment of Relatives Policy, as contained in the [Employee Handbook](#). Please note that our Employment of Relatives Policy does not restrict a League Office employee and a Club employee from being related.

Compliance Scenario:



I work in Sponsorship, and my spouse works for ABC Beverage Company in their sales department. My NFL job responsibilities include managing the account for the NFL’s relationship with ABC Beverage Company, an NFL sponsor. Do I need to disclose this situation to Compliance? Yes. Disclose this on your annual Compliance Plan Certification and speak with a Compliance Officer. Compliance would work with you to avoid a conflict of interest and the appearance that NFL confidential information could be shared with ABC. Keep in mind, depending on the circumstances, the NFL may choose to modify your job responsibilities if it deems your spouse is in a role at ABC Beverage Company that could present an ongoing conflict of interest.

2. Outside Employment or Services

Conflicts of interest can arise when securing employment or providing consulting or other forms of service to an organization outside of the NFL.

Such conflicts can arise for a number of reasons, including: the outside work requires a time commitment that impedes your ability to perform your NFL duties; the outside work would require you to use NFL contacts, knowhow, or resources; the outside organization competes with the NFL or a Club; the outside organization is an NFL business partner or vendor; or the outside work is prohibited by the [Gambling Policy for NFL Personnel](#).

Disclosing and Obtaining Compliance Officer Approval for Outside Employment:

To avoid any conflicts of interest with respect to securing outside employment or providing services to an outside organization, you must take the following steps:

- **Full-Time Employees:**
 - **Advance Approval for Outside Employment:** Prior to accepting any outside employment or providing services to an outside organization, you must obtain Compliance Officer approval and notify Human Resources. Please reach out to a [Compliance Officer](#) to discuss.

- **Notification of Prospective Employment with Business Partners and Clubs:** In order to avoid a potential conflict of interest, or the appearance of one, full-time employees must notify a Compliance Officer if they are actively engaged in discussions with any of the NFL's business partners concerning prospective employment with that business partner. This notice requirement also applies to discussions of prospective employment with an NFL Club and is in addition to the requirements of the NFL Anti-Tampering Policy. In no circumstances will this notice requirement prevent an employee from engaging in such discussions or accepting such employment; however, following such a notification, the NFL may choose to implement appropriate safeguards during the pendency of any such discussions.
- **All Other Employees:** You must disclose any outside employment or services you provide on your annual Compliance Plan Certification. If you obtain outside employment after you submit your annual certification, you must inform a Compliance Officer of the outside work.

Based on the nature of the outside work or services, a Compliance Officer may ask questions about the work, including what you would be doing, the employer or organization you would be providing services to, the time commitment the work may require, and any compensation or equity you may receive. These questions are to confirm that the outside work does not conflict with your NFL duties.

3. Board Service

You may be asked to serve on a board of directors or advisory board of a corporation, charity, or other organization. The League respects these commitments and encourages all employees to be involved in civic or charitable activities of their choice. It is possible, however, that service on a board could pose a conflict with your NFL responsibilities.

Obtaining Compliance Approval: In most circumstances, you must obtain [Compliance Officer](#) approval prior to joining the board of directors or advisory board of a corporation, charity, or other organization. Depending on the board position, you may also need to obtain the approval of your department head.

When seeking Compliance Officer approval, you may be asked: whether the corporation or organization is, or may become, a vendor or business partner to the NFL; whether the NFL and the corporation are competitors; any equity, compensation, or other fees you may receive or be awarded by virtue of your board position; and whether the corporation or organization has requested that you enter into an agreement with it concerning your board position.

If your board service is approved by a Compliance Officer, you may be required to periodically update Compliance regarding your position; for example, if the corporation or organization becomes an NFL vendor or business partner or competes with the NFL. There may be circumstances in which you must recuse yourself from certain board activities and/or circumstances when Compliance may revoke its prior approval. At all times, you should seek guidance whenever the potential for conflicts or competing interests arises.

Compliance Scenario:



I work in the International group on social media initiatives. I was asked to join the advisory board of a startup tech company that offers unique services for use on social media platforms that the NFL is considering using. Do I need to disclose this situation to a Compliance Officer? Yes, you must contact a Compliance Officer to discuss joining the company's board prior to accepting this position.

Your board service must be in your personal capacity and not as a representative of the NFL, cannot detract from or conflict with your ability to perform your NFL duties, and should not utilize NFL personnel or resources, unless you obtain advanced approval from a Compliance Officer.

Board Insurance: For-profit corporations should provide you appropriate levels of D&O insurance and should fully defend and indemnify you and the NFL for any costs or claims that the NFL or any Club may incur as the result of your board service. It is highly advisable for you to ensure that any not-for-profit organizations you serve maintain adequate insurance coverage for directors and officers. If the organization does not carry such insurance, you should consult your own agent or broker to determine whether you already have or should separately purchase such coverage.

Note: Compliance Officer approval is not required if you are providing unpaid voluntary service to an educational, charitable, residential, and/or religious organization that is entirely unrelated to sports, media, entertainment, or gambling.

4. Ownership Interests and Trading Securities

A conflict of interest can arise if an employee has an ownership interest in an NFL vendor or business partner.

You must obtain approval from a Compliance Officer before owning an interest in a League business partner, unless one of the following conditions is met: (a) your ownership interest is through a blind trust or mutual fund-type arrangement; or (b) the company is sufficiently large (e.g., public companies with market capitalization in excess of \$1 billion) and your ownership interest is *de minimis* and therefore unlikely to be considered material to the business partner's financial condition. This rule is to: (i) ensure the integrity of our decision-making processes; (ii) avoid any appearance of impropriety or conflicts of interest; and (iii) avoid concerns about the possibility of insider trading. Employees are required to conduct due diligence, including, but not limited to, reviewing public records to determine if investment in a particular company is permissible under these rules.

Compliance Officer approval is needed prior to investing in or joining the board of a Special Purpose Acquisition Company (SPAC).

In addition, NFL employees may not take advantage of any business opportunity in any public or private enterprise, or any parent, subsidiary, or affiliate of such enterprise, resulting from such NFL employee's employment with the NFL (this includes relationships with any such enterprise

with which the NFL or a Club or an owner of a Club does business, as well as NFL or Club sponsors, licensees, significant marketing partners or vendors, and other significant business partners).

Insider Trading: It is against NFL policy (and the law) for any employee to engage in “insider trading”, which commonly refers to the use of material non-public information in connection with the purchase or sale of a publicly traded security. It is also illegal to trade on material non-public information obtained as a result of your NFL employment, in a way that attempts to hide or mislead others regarding the true identity of the trader. Under no circumstances may an NFL employee invest or divest any shares in a company if the NFL employee is aware of material non-public information about the company. For purposes of these rules, (a) any reference to “employee” includes members of an employee’s immediate family and/or household, and (b) any reference to “ownership” includes ownership in the employee’s name or the name of a broker, bank, or other nominee or agent.

5. Gifts, Entertainment, and Other Hospitality Between Employees and Business Partners/Others

Gifts to and from business partners can pose conflicts of interest, as business decisions should not be influenced by gifts given or received. As a result, careful consideration should be given whenever receiving or giving a gift. Gifts can take many forms, including game tickets, entertainment, meals, retail merchandise, partner technology, food or wine baskets, and gift cards. For the purposes of the Compliance Plan, the term “business partners” refers to outside individuals and entities doing or seeking to do business with the NFL or acting on the NFL’s behalf.

These rules apply to anyone you may interact with in your NFL work, such as current and potential sponsors, partners, advertisers, League customers and vendors, and service providers.

Gifts – When You Must Obtain Compliance Officer Approval:

- **Significant Gifts:** You must obtain Compliance Officer approval for any **significant gifts**, which are valued at more than \$250USD, you receive or plan to give to a League business partner.
 - All offers of significant gifts, whether accepted or declined, must be reported to a Compliance Officer. NFL Executive Management is provided a summary of significant gifts.
 - A series of gifts received over the course of a twelve-month period from a single business partner that totals over \$250USD also qualifies as a significant gift.
 - Your department head may also need to review significant gifts.
- **Gifts to Government Officials:** A proposed gift to a U.S. or foreign government official must be approved by a Compliance Officer prior to offering the gift. (Please see Section III.E [Anti-Corruption / Gifts and Hospitality for Government Officials](#) regarding gifts to government officials.)

Soliciting Gifts: Under no circumstances should you solicit a gift, regardless of its value, from any business partner.

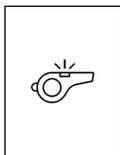
Gift Procedures:

- **Gift Tracking:** Employees are responsible for tracking the value of gifts received or given for purposes of determining whether gifts given or received over the course of a twelve-month period constitute a significant gift. Accordingly, employees should create and maintain a gift log that tracks the date of the gift, the approximate value of the gift, and the business partner associated with the gift.
- **Receiving a Significant Gift:** If you receive a significant gift, you should – if practicable – explain our policies to that business partner and request approval from a Compliance Officer before you accept it. If advance approval is not possible, you must request approval within seven (7) days of receipt of the gift. If approval is not granted, you should decline the gift or return it.
- **Sharing or Distributing a Significant Gift:** If declining or returning a prohibited gift is not practicable, an alternative solution will be arranged by a Compliance Officer. Examples of such solutions are donating the gift to charity, distributing a food basket or similar gift among members of your department, holding a lottery for the gift among employees, or having the employee pay fair market value to the business partner for the prohibited gift.

Gift Red Flags:

- **Gifts Offered to Influence Your Decisions:** Gifts offered by business partners shortly before, during, or after contract negotiations may be an attempt by the business partner to influence your decisions. Increased scrutiny should be given to gifts offered during these times. You should discuss with a Compliance Officer should this situation arise.
- **Told Not to Disclose Gift:** If the person offering you a gift urges you not to disclose the gift, you should report those statements promptly and either decline the gift or turn it over to a Compliance Officer.
- **Payments to Government Officials:** No payment of any kind, whether it is in cash or other value provided, should be made to any government official or entity without first consulting a Compliance Officer in order to determine whether the payment would be permitted.

Compliance Scenario:



Following the season, a game day technology provider wants to give gift cards to NFL Football Operations employees in recognition of their hard work and collaboration throughout the season. The provider's contract with the NFL expired after Super Bowl and the provider and Football Operations are in renewal negotiations. Can NFL employees accept these gifts? You should consult with a Compliance Officer before accepting these gifts. Depending on the size of the gift cards, they may exceed

the Gift Policy's \$250USD limit. In addition, accepting the gifts under these circumstances may create a conflict of interest.

Special Gift Circumstances:

- **Speaking Fees:** Unless authorized, receipt of any fees or significant gifts for contributing to media or social media, or for speaking at an engagement or other event concerning your role with the NFL or because you are an employee of the NFL, is not permitted. (As noted in Section III.N [Media Requests, Speaking Engagements, and Appearances Policy](#), you must refer any speaking engagement requests and opportunities to the Communications Department and obtain approval from your department Senior Vice President or Executive Vice President.)
- **Gift to/from Club Personnel:** As gift-giving to and from Club personnel occurs from time to time, you should consult with a Compliance Officer concerning any questions you may have about such gifts and avoiding conflicts of interest.
- **Gifts to Onsite Vendors:** Employees are prohibited from giving gifts of any value to the NFL's "onsite vendors" such as mailroom, travel, reception, IT, and similar non-employee staff who may provide services at our office locations. The [Onsite Vendor Gift Policy](#) provides further information in this regard.



Compliance Scenario:

I spoke at an event promoting youth football and received a \$300 gift card to a retail clothing store. Can I keep the gift card, or would that violate the Gift Policy? You should discuss this matter with a Compliance Officer; likely this would be considered a significant gift under this Policy, and the gift card should be returned. Requests to speak at events concerning your NFL role must be approved by your department Senior Vice President or Executive Vice President and the Communications Department.

Exceptions to the Gift Rules that Require Compliance Officer Disclosure and Approval, in Advance if Possible (Department Head Approval May Also Be Required):

- **Separate Relationship:** You can demonstrate that you have a separate relationship outside of your NFL employment with the individual from whom you receive the gift, and such gift was provided in a manner that would not otherwise be deemed to gain business favor for future NFL business or to thank you for past NFL business awarded.
- **Business Reason:** Business partner has a legitimate business reason to provide the gift (*e.g.*, a licensee providing licensed products to attendees for use at an NFL event) and the gift is the type of product the business partner normally offers consumers in the course of its business.
- **Local and Reasonable Entertainment:** Offering or accepting entertainment to/from a business associate is permissible as long as the entertainment is reasonable (*e.g.*, dinner, sports event) and either (i) does not involve travel occurring outside of the local area, or (ii)

if occurring outside of the local area, involves travel that has been paid for by you personally or by the NFL.

Exceptions to the Gift Rules that Do Not Require Compliance Officer Disclosure and Approval:

- **Partner Gift Packages:** Receipt of an item that is part of a standard gift package provided by the business partner to all NFL employees at an NFL event.
- **NFL Gift Packages:** Distribution of standard NFL gift packages, by you or your department, to business partners at an NFL event (e.g., Super Bowl) does not constitute the offering of a significant gift.

Compliance Tip: When in doubt whether you can accept or give a gift, reach out to a [Compliance Officer](#).

There may be instances in which a business partner offers to cover an employee's travel, accommodations, and admission costs to attend an event. Depending on the nature of the offer, the business partner may be able to cover some of the costs associated with the event. If a business partner offers to cover your travel or other costs associated with attending an event, reach out to a Compliance Officer to determine what, if anything, you can accept from the business partner.

Travel and/or accommodations provided should not be lavish. Depending on the nature of the offer, the business partner may be permitted to cover some of the costs associated with attending the event, with the NFL to cover the rest.

Compliance Scenario:



I work in the Digital Media group, and an NFL vendor has offered to pay my attendance fees for an industry event. The vendor has also offered to cover my flights and accommodations to attend the event. Can I accept the vendor's offer to cover event fees, flights, and accommodations? You should consult a Compliance Officer to determine whether you can accept the vendor's offer. Depending on the value of the vendor's offer, the vendor may be permitted to cover some of the costs associated with attending the event, with the NFL to cover the rest.

7. Personal Interactions, Business Development Opportunities, and NFL Resources

Employees should not engage in outside activities in which they seek to improperly use their NFL knowledge, resources, or contacts, or take advantage of improper personal benefits by virtue of their NFL position. Below are scenarios in which such improper benefits could arise. If any of these scenarios arise, please contact a Compliance Officer to discuss.

Personal Interactions: When engaging with potential and current business partners and vendors, you are expected to act in a manner that is in the best interests of the NFL. You are expected to make business decisions solely on their merits and without regard to non-NFL considerations, such as personal considerations. For example, you cannot solicit or receive any benefit that is not generally available to NFL employees or the general public in consideration of doing business; have financial investment or ownership in a business partner (unless disclosed and approved in accordance with guidance in Section III.F.4 [Ownership Interests and Trading Securities](#)); or solicit donations for charitable or civic organizations from business partners or spend NFL funds for such purposes in circumstances in which you gain significant benefit from such activity.

Business Development Opportunities: The NFL is constantly exploring business development opportunities, including ways to grow its existing businesses and to develop new sources of revenue. You are expected to immediately notify the NFL regarding business opportunities that you reasonably know the NFL is or might be interested in pursuing, and to avoid personal involvement in business opportunities that might conflict with the NFL's interests. For example, you cannot compete with the NFL in the development or implementation of a business opportunity; provide consulting, employment, or other services to – or have a personal financial involvement in – a venture in which the NFL is a participant or is likely to be or which competes or could compete with the NFL; or own property affected by the NFL's actions or acquired as a result of NFL-related non-public or confidential information.

In addition, you cannot spend time setting up or consulting other businesses or seeking clients for a new venture in expectation of leaving the NFL, during regular NFL business hours, while still employed by the NFL; provide independent consulting, employment, or other personal services to, or personally invest with, any business partner, or any player, agent, Club executive, game official, or any individual who owns or operates a Club; participate in a business or investment opportunity made available to you by virtue of your position at the NFL and not available to others inside or outside the NFL (*e.g.*, accepting the opportunity to purchase shares on a preferred basis in an initial public offering of a current or potential NFL business partner or serving on an outside board); or engage in outside activity of any type that is so substantial that it would call into question your ability to devote appropriate time and attention to your job responsibilities with the NFL.

NFL Resources: Employees should avoid using their position with the NFL to access or utilize NFL resources (*e.g.*, personnel, work areas, or equipment) in connection with outside personal activities. Scenarios to avoid include using NFL On-Air Talent to promote outside personal services you may provide (*e.g.*, wardrobe, hair, or makeup services), featuring NFL On-Air Talent on a personal podcast or social media outlet, and using NFL production staff and equipment in connection with outside personal activities. These are inappropriate uses of NFL resources as they create a conflict of interest, or the appearance of a conflict. They could also portray NFL personnel involved in such features or promotions in a manner unfavorable to the League.

Compliance Scenario:



A friend and I would like to start a podcast where we talk about pop culture and sports, including the NFL. Are there any limitations on what we discuss on the podcast? As an NFL

employee, you should never represent that you speak on behalf of the NFL. In addition:

- Do not discuss any League or Club confidential or proprietary information, including NFL Media research or inside information you may have access to. For example, information relating to League or Club executives and other personnel, player injuries, roster moves, disciplinary matters, and business decisions prior to public announcement.
- Do not promote gambling, including discussing betting lines on the NFL or any other sports. You should not make pick recommendations on NFL games or events.

Can we show highlights from NFL games on our podcast? No. You should not use any NFL intellectual property on the podcast, including footage from NFL games or any logos and trademarks of the NFL or Clubs.

What if I record segments of the podcast while working at Super Bowl or Draft? Under these circumstances, capturing or otherwise creating content for your own personal use or advantage is inappropriate. NFL employees must use the unique access they have to NFL events responsibly and refrain from engaging in conduct that might result in a conflict between your role with the League and your personal activity.

Can I ask an NFL On-Air Talent to appear on our podcast? Before asking any NFL On-Air Talent to appear on your podcast, you should speak with both a Compliance Officer and your department head, as various factors may influence the permissibility of such a request.

G. NFL Gambling Policy

The NFL is strongly committed to maintaining the integrity of its brand, games, Clubs, players, coaches, and other League and Club personnel. Gambling, particularly betting on NFL games or other sports, presents risks to the integrity of our competition and team cohesion, and can undermine the confidence and trust of our fans and colleagues in America's greatest game. As set forth in the [Gambling Policy for NFL Personnel](#), employees (and other NFL Personnel) are subject to the following prohibitions concerning gambling activities, regardless of whether the activities are legal in a given state or location:

Key Gambling Policy Rules for NFL Personnel:

- **Never Bet on the NFL:** Do not bet on NFL games or events (*e.g.*, Draft or Combine). This includes betting on game outcome, statistics, score, performance of any individual participant, or any other kind of "prop" bet or parlay bet.

- **Never Bet on Other Sports:** Do not bet on any other professional, college, international, or amateur sports competition, tournament, or event.
- **Never Play Daily Fantasy Football:** Do not participate in any “daily” or other similar short duration fantasy football game that offers a prize. You cannot play in a season-long fantasy football contest if the prize exceeds \$250.
- **Never Share Inside Information:** Do not use, disclose, or provide access to confidential, non-public NFL information, including: player health and wellness, rosters, coaches, gameplans, contract or trade status, and disciplinary matters.
- **Never Gamble in the Workplace or While Working:** Do not engage in any form of gambling while at a League Office, Club facility or stadium, while traveling for a game or other League business, or while staying at a staff hotel.
- **Never Enter a Sportsbook During the NFL Playing Season:** Do not enter, visit, or use a sportsbook at any time during the NFL playing season.

Working for a Gambling Entity: Employees (and other NFL Personnel) may not work for or operate a gambling entity (e.g., a casino, sportsbook, or other establishment or business that offers commercial gambling). Please contact a Compliance Officer if any non-NFL work you perform involves a gambling entity.

Owning an Interest in a Gambling Entity that Generates Revenue from Sports Betting: Employees (and other NFL Personnel) may hold certain investments in publicly traded companies with sports betting revenue, as authorized under the Gambling Policy and as pre-approved by NFL Compliance, where required. Review the Gambling Policy or consult with a Compliance Officer if you have any questions.

Compliance Tip: Contact a [Compliance Officer](#) if you have any questions about the Gambling Policy, which can be found [here](#).

Compliance Scenarios:



I am going with my family on a vacation to Las Vegas during the Thanksgiving holiday. My spouse and I plan to gamble on casino games, including Blackjack and Roulette. Is this permitted? Yes. So long as you are at the casino on your personal time and not on League business, you can gamble on casino games.

The hotel where we will be staying has a sportsbook. Can I also place bets at the sportsbook while I am on my vacation? No. The Gambling Policy prohibits employees from both entering a sportsbook during the NFL playing season and from placing bets on any sports while employed by the League.

My friend asked me to enter a NCAA March Madness tournament bracket. I am not required to pay an entry fee, but a

\$100 cash prize will be awarded to the winner. Can I enter the bracket? No. The potential for receiving a prize for college sports betting makes this opportunity prohibited.

H. Game and Event Tickets

Certain rules apply to employees' ability to resell NFL game and event tickets.

1. Tickets Obtained from the League, a Club, or a League Business Partner

Cannot Resell Tickets for Profit: Employees are prohibited from reselling NFL game and event tickets obtained from the League, a Club, or a business partner for any profit, even one dollar.

- This rule applies to all NFL games (including pre-season, regular season, post-season, or Super Bowl) and League- and Club-sponsored events (e.g., NFL Super Bowl Tailgate Party, NFL Honors, NFL Draft, team party, or other).
- Re-sale of such tickets for profit is prohibited whether it is considered selling, bartering, or trading and regardless of whether the transaction is legal in a given state.
- Re-sale of such tickets for profit is prohibited whether the ticket was provided for free, has no face value, or was purchased at face value.

No One Else Can Profit from the Re-sale of Tickets: No one else, e.g., family or friends, may profit or otherwise benefit from the transfer or sale of such tickets.

Employees Held Accountable for Actions of Third Parties: Employees will be held accountable for the actions of any third party to whom they either directly or indirectly sell or give NFL game or event tickets. If you can permissibly sell or give such tickets to a friend or acquaintance, you must explain to that person that the ticket cannot be transferred or re-sold in violation of this Policy, and if that person ignores your advice, you will be held responsible as if you yourself engaged in the transaction.

Compliance Tip: Contact a [Compliance Officer](#) if you have any questions about the use or re-sale of NFL game and event tickets.

2. Other Ticket Rules

Ticket Donations: If you wish to donate tickets that were obtained from the League, a Club, or a business partner to a charity for inclusion in a raffle prize or auction donation, you must report the transaction to a Compliance Officer at the time of the transaction using the [Ticket Raffle Form](#) on Playbook or by contacting a Compliance Officer.

NFL Pro Bowl Games and Super Bowl Staffing and Attendance Policy: Employees who receive complimentary game or event tickets (e.g., NFL Super Bowl Tailgate Party) as working staff who are subsequently removed from the working staff assignment list or whose date of departure has changed so they are no longer in attendance through the completion of the game or

event, are required to return their tickets to the League. Supervisors who become aware of removals from the working staff list must promptly notify the Events Department so tickets can be properly revoked and/or reassigned. These requirements further apply to employees whose employment with the League is terminated prior to the game or event.

Personal NFL Game Tickets: Employees are only permitted to re-sell personal NFL game tickets (*i.e.*, those that were not obtained from the League, a Club, or a business partner) at greater than face value if they use one of the NFL Ticket Network Partners: the NFL Ticket Exchange, Seat Geek, or Sports Illustrated Tickets. Employees must retain records of the transaction and produce such records upon the request of a Compliance Officer.

Compliance Scenarios:



My department colleague bought Rams tickets from the NFL at face value and sold them to me for half-price when she learned she could not attend. I now have a conflict as well. Can I sell the tickets to my neighbor for face value? No. The Compliance Plan prohibits the re-sale of NFL-issued tickets for any profit, even if you are re-selling the tickets at face value. The most you could sell them for is the price you paid your colleague for the tickets.

I purchased two tickets to the Super Bowl from the League at face value. I sold the tickets, also at face value, to “a friend of a friend” that I have never met or spoken to. Could this violate the Compliance Plan? You complied with the Policy prohibiting the sale of game tickets obtained from the League for more than face value. However, you did not comply with the Policy that applies when you give or sell game tickets to a friend or acquaintance, which requires you to explain to that person that the tickets cannot be transferred or re-sold in violation of League policy. If the tickets are re-sold for more than face value, you will be held responsible as if you yourself engaged in this transaction and may face discipline for your non-compliance.

I. Profiting from Certain League or Club Gifts

From time to time, employees may receive certain items of value from the League or a Club on a complimentary basis, such as NFL memorabilia, often relating to working at an NFL game or event. Such items should be considered unique and obtained because of your employment with the NFL. As such, employees should not make a personal profit from the re-sale of these items.

Should you wish to donate such items of value for charitable purposes, contact a Compliance Officer.

J. Compliance with Antitrust Laws

The United States, most state governments, the United Kingdom, the European Economic Community, and many other foreign governments have enacted antitrust laws or similar laws designed to protect competition in the marketplace. The League expects its employees to comply fully with all such laws and related requirements.

The antitrust laws prohibit agreements between and among economic competitors that reduce competition, as well as certain efforts by a single company to obtain or preserve a monopoly. Violations of the antitrust laws can lead to substantial civil liability. Some such violations may be deemed criminal acts that can result in felony convictions. If you have questions or concerns about antitrust or competition-related issues, please bring them promptly to the Legal Department.

The antitrust laws strictly prohibit agreements between or among competitors to fix prices; to allocate markets, customers, or employees; or to rig bids. If you have occasion to communicate with employees of any actual or potential economic competitor of the NFL (including, without limitation, other sports leagues; other providers of television programming; other providers of cultural and entertainment events; and other licensors of apparel, merchandise, and trading cards), be certain never to discuss any of the following, whether of the NFL or of the NFL's competitors: prices, royalties, other terms of sale, costs, inventories, product plans, marketing strategies, or employee recruitment and compensation. If an economic competitor attempts to talk with you about any of these matters, you must object and not participate. If the discussion continues, you must remove yourself from the conversation. It is also important to note that while the League and its Clubs collaborate as a joint venture to create and promote NFL football, the League and the Clubs are still subject to the antitrust laws.

The antitrust laws also govern the League's and Clubs' dealings with suppliers, vendors, sponsors, licensees, and customers. Accordingly, League employees must be cognizant of the antitrust laws when collaborating, communicating, and sharing information with and among Clubs and in dealings with League and Club suppliers, vendors, sponsors, licensees, and customers.

Please contact the Legal Department whenever you have a question relating to the laws governing competition or concerns about the possible anti-competitive effect of particular transactions.

K. Contract Management Policy

The [Contract Management Policy](#), as available on Playbook, sets forth the procedures covering the stages of the contracting process, including:

- Selecting business partners, customers, and vendors; ensuring that proper due diligence and background checks have been performed on the partner and its staff; drafting of agreements; and administering the rights and obligations created under the contract.
- The retention of independent contractors.
- Procurement guidelines with respect to ensuring a fair and competitive vendor selection process (*e.g.*, the requisite number of bids that must be obtained based upon estimated annual spending).

- The roles which Legal, Compliance, Security, Information Security, and Finance should play in negotiating, drafting, and finalizing contracts.

Note that the Contract Management Policy requires execution of contracts through the Contract Management System. In addition, only NFL employees with the title of Senior Vice President or higher have the authority to sign contracts.

Further, unless otherwise agreed to by the Legal Department, the NFL's Contract Management System must be utilized when processing any contract for execution. Contract execution via the Contract Management System requires the use of DocuSign. Unless an exception has been granted by the Legal Department, every contract must be uploaded into the Contract Management System.

Government contracting, whether federal, state, local, or international, requires special attention. No phase of contracting – selection, negotiation, drafting, or otherwise – should occur with respect to any governmental organization or authority without pre-notification to the Legal Department.

L. Intellectual Property

Intellectual property is a term used to describe intangible assets such as copyrights, trademarks, trade secrets, and patents. A substantial part of the business of the NFL involves licensing and other uses of NFL trademarks, copyrights, and other intellectual property. In addition, many licensees and sponsors of the NFL use their own intellectual property (such as trademarks and copyrighted designs) in conjunction with NFL intellectual property. All employees should make every effort to ensure that the intellectual property rights of the NFL and its licensees, sponsors, and others are not infringed.

To copy or reproduce a copyrighted work without permission, or to make unauthorized use of another's trademark, may constitute an infringement of the copyright or the trademark. Similarly, the use of a third party's trade secrets, patents, or business ideas without permission may be unlawful. Such unauthorized uses of copyrighted works, trademarks, trade secrets, patents, business ideas, or other intellectual property could subject the NFL to civil liability and, in extreme cases, criminal punishment. No employee should make use of any trademark or copyrighted materials not belonging to the NFL without first determining whether permission has been granted for that use. Questions about use of any third-party intellectual property should be directed to the Legal Department. You also should consult the Legal Department about any unsolicited business submissions or proposals you receive and should not agree to receive submissions or proposals (either verbally or in writing) without first consulting with the Legal Department.

M. Use of Social Media

The growth of social media platforms such as TikTok, X (formerly Twitter), YouTube, Instagram, LinkedIn, Snapchat, and Facebook have created important new ways for the NFL to communicate with fans. We define social media as means of public communications with other people via the Internet. The NFL has been at the forefront of the use of new platforms and will continue to emphasize innovative and appropriate use of these forms of communication. While these platforms present opportunities, we must be mindful of longstanding policies that serve to protect the

League's core values, the integrity of our game, and our long-term business interests. Accordingly, all employees are expected to adhere to the following principles:

- All employees who believe they have a business purpose that necessitates the use of social media platforms for official NFL communications (i.e., to post messages on social media on behalf of the NFL) must contact the Communications Department for approval.
- Employees may receive questions on social media regarding issues relating to the League. Employees may not, under any circumstances, respond on behalf of the League on their own. In addition, any press releases or other information provided to the media, whether promotional, informational, or otherwise, which is, or will reasonably appear to be provided on behalf of the NFL, must be approved in advance by the Communications Department.
- If given approval to use social media for official NFL communications, all communications and statements made through social media must be professional, accurate, and consistent with all NFL policies and procedures.
- The very public and immediate nature of these sites renders any post or comment “on the record”, available to the media, public, and NFL business partners, and subject to discovery in litigation matters.
- Making confidential or privileged information public will subject an employee to discipline, up to and including termination of employment, regardless of the communication vehicle used.
- All employees should note that any comment on a social media site (whether on behalf of the League or otherwise), or through any other venue, that violates League policies (including, specifically the Equal Employment Opportunity and the Non-Discrimination and Anti-Harassment Policy), including misrepresenting one's job responsibilities, is prohibited and will subject the employee to appropriate discipline, up to and including termination of employment.
- Employees who have personal social networking accounts, including, but not limited to, TikTok, X, YouTube, Instagram, LinkedIn, Snapchat, and Facebook, may not use them to communicate on behalf of the NFL.
- Employees should not hold themselves out as having the authority to speak on behalf of the NFL and should not use social media handles/monikers that suggest or imply any authority to speak on behalf of the NFL. Employees must respect all copyright and other intellectual property laws when it comes to the use of logos and trademarks of the NFL and Clubs when posting online.
- Except as authorized, employees in the Officiating Department are prohibited from commenting on NFL matters on any social media site at any time, including on game day.
- The NFL reserves the right to require that employees withdraw certain posts, avoid discussing certain League-related subjects, and remove comments in violation of this policy as the NFL sees fit. Importantly, however, nothing in this statement, or in the rest of this Use of Social Media policy is meant to restrict employees from collectively discussing the terms and conditions of their employment with the NFL or engaging in protected concerted activity for mutual aid and protection.

N. Media Requests, Speaking Engagements, and Appearances Policy

This policy broadly covers invitations to appear or communicate with anyone as an official representative of the NFL on any platform, including television, radio, podcasts, social media, at a conference, or any other speaking engagement, lend their name or photography in connection with the promotion of product merchandise, or contribute to any newspaper, periodical, or online media on behalf of the NFL. This also covers any and all statements that an employee might be asked to make on behalf of the NFL for any purpose.

Anyone seeking to represent the NFL at a speaking engagement or other appearance in which they represent the NFL (including as part of a panel or speaking individually) must receive pre-approval by their department Senior Vice President or Executive Vice President and the Communications Department and should contact the Communications Department for further information. In no case may an individual position themselves as working for the NFL, or representing it in any way, without the approval to do so. In addition, all written statements made on behalf of the NFL must be reviewed and approved by the Communications Department.

Additionally, if employees are approached by the media (TV, radio, print, online – including social media) to speak with them, they should immediately forward the request to the Communications Department. Speaking with any member of the media, either on the record or off, without prior permission from the Communications Department is strictly prohibited.

O. Sanctions

It is the policy of the NFL not to engage in business in or with countries or territories that are the subject of comprehensive economic sanctions or with individuals and entities subject to sanctions, unless authorized to do so under applicable law, including but not limited to the laws of the United States.

U.S. sanctions generally prohibit or restrict dealings with the sanctioned country (and its government), territory, entity, or individual, and are broadly applicable to the NFL, its personnel, and those doing business on its behalf. At present, U.S. sanctions broadly prohibit or restrict dealings with Iran, Syria, Cuba, North Korea, the Government of Venezuela as well as Russia, Belarus, and certain territories in Ukraine (Crimea, Donetsk, Luhansk). Sanctioned entities and individuals are identified in various lists administered by the U.S. government. The NFL also complies with sanctions applicable in other jurisdictions where it operates.

Violations of sanctions laws and regulations may create substantial legal and reputational exposure, both to the NFL, its personnel, and other responsible individuals. These penalties include criminal penalties, civil monetary penalties, and serious damage to the NFL's good name and reputation. If you become aware that a sanctioned country, territory, entity, or individual may be involved in a transaction or dealing, please contact a Compliance Officer immediately for further review.

P. Right of Publicity Release

As many NFL employees are involved in game and other event activities (in the NFL offices or at offsite locations) in which all or portions of such activities may be captured for use on media, including film, video, photograph, or similar means, and employees appear in this media, all employees are subject to the following provision and agree to same when they acknowledge their understanding of this Compliance Plan:

I understand that, in connection with my work at the National Football League (“NFL”) offices, I may be identified, interviewed, filmed, or photographed, or that my image may appear in film, video, or photographs taken during activities or events organized or conducted by the NFL, and hereby grant the NFL, NFL Ventures, L.P., NFL Properties LLC, NFL Productions LLC, and each of their parents, subsidiaries, affiliates, successors and assigns, and each of their respective shareholders, officers, directors, employees, agents, representatives, and licensees (collectively, the “NFL Entities”) the irrevocable, perpetual, worldwide, and royalty-free right, but not the obligation, (a) to take such interviews, testimonials, photographs, films, or videos containing my name, identity, and/or likeness (the “Images”), and (b) to copy, modify, adapt, distribute, publish, display, exhibit, and otherwise use, either in whole or in part, the Images, or my name, identity, and/or likeness, for any purpose whatsoever, including, but not limited to, advertising purposes, or for the purposes of trade, in all media now known or hereafter created, throughout the universe, in perpetuity. I understand and agree that the Images may or may not contain attributions specifically identifying me, and I hereby release and discharge the NFL Entities, their employees, agents, successors, licensees, and assigns from any and all claims I might have in connection with the NFL Entities’ use, display, dissemination, or exploitation of the Images, including, but not limited to, any claims for defamation; violation of any moral or artist rights; and/or any right of privacy or publicity. I acknowledge that, as between me and the NFL Entities, the NFL Entities are the sole and exclusive owners of all right, title, and interest in all copyrights, trademark rights, and any and all other intellectual property rights, worldwide, in the Images, and the individual components thereof and I shall take no action to challenge or object to the validity of such rights or the NFL Entities’ ownership or registration thereof.

IV. POLICIES RELATED TO INFORMATION SECURITY AND DATA

A. Information Security Policies

All employees are expected to abide by the [Information Security Policy](#) and the [Information Security Requirements Index](#), both of which may be accessed on Playbook.

B. Document Management Policy

All employees must comply with the NFL’s [Document Management Policy](#), which may be accessed on Playbook.

C. Artificial Intelligence Policy

The NFL recognizes the potential of Artificial Intelligence to drive innovation, streamline operations, inform decision making, and enhance customer experiences. We also recognize that AI carries with it significant risks and that it is essential that it be used in a responsible and safe manner. The NFL strives to leverage these tools for the benefit of the League and Clubs, business operations, customers, and other stakeholders, while minimizing risks and addressing any concerns that may arise in the use of these technologies. All employees must comply with the NFL's [Artificial Intelligence Policy](#), which may be accessed on Playbook.

D. Data Privacy

All employees must comply with the NFL's internal [Data Privacy Policy](#), which may be accessed on Playbook. In addition, the NFL is committed to handling fan data in accordance with our external facing [Privacy Policy](#) and other data in accordance with any other posted privacy disclosures, including employee and candidate privacy notices.

E. Expectation of Privacy

All communications and information transmitted by, received from, or stored in the NFL's Systems (referring to the NFL's computer system, including electronic mail ("e-mail"), instant messaging, and internet capability) are the property of the NFL. Furthermore, during the course of carrying out their responsibilities, authorized representatives of the NFL may access or monitor the NFL's Systems. As such, employees should have no expectation of privacy when utilizing the NFL's Systems.

NFL-owned mobile devices and non-NFL-owned devices that store NFL information are subject to auditing and monitoring of NFL information and mobile device management controls at all times, to the extent permitted by local law. All employees are required to comply with the NFL's [Information Acceptable Use Policy](#), available on Playbook, which contains further requirements applicable to NFL Information Assets.

V. POLICIES RELATED TO HUMAN RESOURCES AND SECURITY

Concerns or violations related to the NFL Policies for Equal Employment Opportunity, Non-Discrimination, and Anti-Harassment; Labor Matters; Substance Abuse; Guns, Weapons, and Violent or Threatening Conduct in the Workplace; and the Personal Conduct Policy, as described below, should be reported to Human Resources, NFL Management Council, or the Security Department (as indicated below), and will be handled by such departments, provided that such matters do not directly involve members of these respective departments. In cases where matters involve members of those respective departments, you should report these matters to a Compliance Officer.

A. NFL Policy on Equal Employment Opportunity, Non-Discrimination, and Anti-Harassment (Human Resources)

The NFL is committed to providing equal employment opportunities and a work environment in which all individuals are treated with respect and dignity. Each person has the right to work in a professional atmosphere free from harassment, including racial and sexual harassment. The NFL finds unacceptable and will not tolerate any form of discrimination or harassment based on actual or perceived race (which includes traits historically associated with race, such as hair texture or protective hairstyles), color, religion (including all aspects of religious beliefs, observance or practice, including religious dress or grooming practices), sex (including pregnancy, reproductive health decisions, lactation, childbirth or related medical conditions), sexual orientation, gender identity, gender expression, transgender status, age, national origin or ancestry, alienage or citizenship status, caregiver, physical or mental disability, height or weight, genetic information (including testing and characteristics), marital or partnership status, status as victim of domestic violence, sexual violence, or stalking, veteran status, uniformed service member status, any other status protected by federal, state or local law, or the combination of two or more of these statuses. This Policy extends to the workplace, all work-related settings, and NFL-sponsored events.

It is the NFL's policy to comply fully with all applicable anti-discrimination laws, wage and hour laws, and other statutes or legal requirements regulating the employer-employee relationship and the workplace environment. No NFL employee may interfere with or retaliate against another employee who seeks to invoke his or her rights under the above referenced laws.

A complete statement of the NFL's policy on this subject and the procedures that are in place for raising complaints involving equal employment opportunities, discrimination, or harassment are available in the [Employee Handbook](#) or by contacting Human Resources.

B. Labor Matters (NFL Management Council and Human Resources)

The NFL deals with labor organizations such as the NFL Players Association and NFL Referees Association. Under U.S. law, it is illegal for the NFL or an NFL employee to pay to or receive from any labor organization that represents NFL or Club employees, or any official of such labor organization, any money or other thing of value. If you have any questions, please contact NFL Management Council or Human Resources.

C. Substance Abuse Policy (Security)

The NFL promotes a drug-free and alcohol-free workplace for all NFL employees and considers substance abuse to be a potential safety and security problem. The unlawful manufacture, distribution, possession, or use of a controlled substance at an NFL facility or while conducting NFL business is prohibited. Coming to work or performing your job duties under the influence of alcohol, marijuana, or illegal drugs is a violation of the NFL Substance Abuse Policy. Consuming, smoking, or otherwise ingesting marijuana on NFL premises or during work hours, including during meal and rest breaks, is also a violation of this Policy. Violations of this Policy will result in disciplinary action, up to and including termination of employment, and may have legal consequences. For more information, review the Substance Abuse Policy, located in the [Employee Handbook](#).

D. Guns, Weapons, and Violent or Threatening Conduct in the Workplace (Security)

You must not bring guns or other weapons, even if legally in your possession, into the workplace or work-related settings. The possession of weapons is strictly prohibited while traveling on League-related business or whenever you are on the premises of the following:

- A facility owned, operated, or being used by a Club (*e.g.*, training camp, dormitory, locker room, workout site, parking area, team bus, team plane, team hotel/motel).
- A stadium or any other venue being used for an NFL event (*e.g.*, a game, practice, or promotion).
- A facility owned or operated by the NFL or any League company.

If you legally possess a weapon, you must understand the local, state, and federal laws that apply. You should be aware that if you take a weapon from one place to another – for example, across state lines – a different set of laws may apply in the new place. For more information, employees should refer to the [Guns and Weapons Policy](#).

Violent or threatening conduct in the workplace or work-related settings is likewise prohibited. This includes any location in which you are performing any service for the NFL or traveling on NFL-related business, and includes the premises of a stadium, facility, or any other venue owned, operated, or being used by the NFL or a Club, or for an NFL event.

E. Personal Conduct Policy (NFL Management Council and Human Resources)

NFL and Club employees, among others, are subject to the [Personal Conduct Policy](#), which should be read by all employees in its entirety. The Personal Conduct Policy addresses and sanctions conduct detrimental to the League and professional football. All employees should review the Policy with particular attention to conduct prohibited, employee reporting requirements, investigations, counseling, other support services that may be available, and the nature of any discipline that may be imposed.