

Belgium Complaint Procedure

Introduction and Scope

At NIKE, Inc. we are committed to doing business with high ethical standards and carrying out our activities in a fair, responsible and sustainable way. We also expect our business partners to adhere to the same principles of legality and integrity to which NIKE holds itself.

We firmly believe that a culture of openness and honesty is an integral part of our company's long-term success. Reporting conduct that does not align with our values and possible breaches of applicable laws and regulations helps us protect NIKE, our employees, partners, investors and consumers, and the communities in which we operate. We treat reports seriously, fairly and promptly, and we take appropriate action to remedy and prevent violations where needed.

If this Procedure conflicts with locally applicable laws and regulations, local law shall prevail.

How to Raise a Concern

There are multiple ways to report a concern.

You may choose to:

- Use the [Speak Up Portal](#). If your concern falls under one of the categories listed in Appendix A, you may choose to have your report routed to a local channel (refer to the “What You Can Report” section below).
- Contact [People Solutions](#) through the NIKE HR website.
- Contact your NIKE manager or any NIKE leader.

You can access the [Speak Up Portal](#) and visit [Zero](#) to find related resources, including information on the various Speak Up channels. NIKE also provides a link to the Speak Up Portal on its [investors website](#). You can report a concern online, or if you prefer to report a concern by phone, the Speak Up Portal will provide you with a toll-free telephone number for the country from which you are contacting us.

Who Can Report a Concern

Anyone who acquired information on a relevant wrongdoing in a work-related/professional context can use NIKE's Speak Up Portal to ask a question or report a concern, including:

- Employees, former employees and candidates whose employment has not started
- Self-employed professionals or freelancers
- Shareholders and persons belonging to the administrative, management or supervisory body, including non-executive members
- Service providers, contractors, subcontractors and suppliers, as well as any persons acting under their supervision and direction
- Volunteers or unpaid workers or trainees.

What You Can Report

You can report any actual or suspected misconduct or concerns relating to NIKE's Code of Ethics, including but not limited to discrimination, retaliation and harassment in the workplace; unethical business conduct; accounting and financial reporting violations; theft, fraud and discount abuse; health, safety and security concerns; misuse or misappropriation of information; product and process concerns; human rights violations and environmental breaches.

However, the Speak Up process and related Complaint Procedure are not intended for questions or complaints about products, orders or customer service-based encounters. These concerns should be addressed to NIKE's [customer service channels](#).

If you are located in Belgium, you may have the option to report locally if your concern falls under one of the categories listed in Appendix A of this Procedure. Choosing to report locally means that your report will be directed to the Local Designated Person, who will be your point of contact throughout the Speak Up process. In Belgium, People Solutions will act as the Local Designated Person. This role may be delegated to other appropriate functions or third parties as needed.

We encourage you to keep using the global channel. However, whether you choose to report locally or globally, your concern will be directed to the appropriate channel.

What Happens After Reporting a Concern Using the Speak Up Portal

When you report your concern either online or by telephone, you will be given a unique report key, and you will be asked to create a password. The report key and password will allow you to access your original report, by internet or telephone. You will also be able to add additional details to your report, and monitor its status. You are encouraged to check back after your report has been submitted to see if any follow-up questions have been posed to you.

How Concerns Are Handled

Regardless of how you choose to raise a concern, your report will be triaged and assigned to the relevant investigations team for review. An initial assessment will be carried out, for which you may be asked to provide additional information about your concern.

You will be informed of the outcome of the initial assessment, and whether it leads to the opening of a formal investigation. If so, and where possible, you will be informed of the outcome of the investigation (subject to privacy and confidentiality requirements).

NIKE will handle your report as efficiently as possible. Each case is different and thus the length of time needed to resolve your concern may vary. NIKE strives to handle all reports thoroughly based on a reasonable timeframe. For concerns that fall within one of the categories listed in Appendix A, you will receive an acknowledgement of receipt within seven days and information on follow-up action within three months of filing.

Remaining Anonymous

NIKE contracts with a third-party company, NAVEX, to host the Speak Up Portal, and to receive and process reports.

You may report your concern anonymously on the Speak Up Portal. If you choose to remain anonymous, NAVEX will not pursue your identity and will ensure anonymity is maintained.

Anonymous reporters can access status updates or check for follow-up questions, if any, by logging into the Speak Up Portal with their report key and password. If you would like to receive notifications, you may provide a personal email address that will **not** be included with your report to NIKE.

Please know that reporting anonymously may limit NIKE's ability to thoroughly investigate your concerns, though we will do so to the best of our ability.

How Confidentiality and Data Protection Are Ensured

The teams responsible for receiving and handling reports treat them in strict confidence. Reports are processed on a need-to-know basis to protect the identity of the reporter and any third parties mentioned, and to maintain the confidentiality of information shared in the report.

The review and investigation of reports are carried out in accordance with data privacy legal requirements. Information concerning the collection, processing and retention of personal data can be found in the [Privacy Policy](#) on the Speak Up Portal.

Protection From Retaliation

NIKE does not tolerate retaliation against any individual who reports in good faith a concern, who assists a reporter in raising a concern, or who participates in any investigation of a suspected violation, even if the allegation is ultimately not substantiated.

Making a Report Externally

If your concern relates to the categories listed in Appendix A, you may choose to submit a report to the following competent authority in Belgium:

- [The Federal Ombudsman - Integrity Center](#)

However, it is strongly recommended to first report possible misconduct to NIKE or the Local Designated Person directly, using any of the channels highlighted in the “How to Raise a Concern” section. This remains the most efficient way to allow NIKE to thoroughly investigate and promptly address reported issues.

Appendix A

Categories of Concerns within the scope of this Complaint Procedure:

- Public procurement
- Financial services, products and markets
- Money laundering and terrorist financing
- Product safety and compliance
- Transport safety
- Protection of the environment
- Radiation protection and nuclear safety
- Food and feed safety
- Animal health and welfare
- Public health
- Consumer protection
- Privacy and personal data; security of network and information systems
- Tax and social fraud
- Financial interests and internal market of the European Union, including competition law and corporate taxation

Klachtenprocedure België

Inleiding en toepassingsgebied

Bij NIKE, Inc. streven we ernaar zaken te doen volgens ethische normen en onze activiteiten op een eerlijke, verantwoordelijke en duurzame manier uit te voeren. We verwachten ook van onze zakenpartners dat ze zich houden aan dezelfde principes voor wettigheid en integriteit als NIKE.

Wij zijn ervan overtuigd dat een cultuur van openheid en eerlijkheid een integraal onderdeel is van het succes van ons bedrijf op lange termijn. Door gedrag dat niet in overeenstemming is met onze waarden en mogelijke schendingen van toepasselijke wet- en regelgeving te melden, kunnen we NIKE, onze medewerkers, partners, investeerders en consumenten beschermen, evenals de community's waarin we actief zijn. We behandelen meldingen serieus, eerlijk en snel, en waar nodig nemen we passende maatregelen om schendingen te verhelpen en te voorkomen.

Als deze Procedure in strijd is met lokaal toepasselijke wet- en regelgeving, prevaleert de lokale wetgeving.

Hoe kan ik een zorg uiten of een melding doen?

Er zijn meerdere manieren om zorgen te melden.

Je kunt kiezen uit de volgende opties:

- Gebruik de [Speak Up Portal](#). Als je zorg onder een van de categorieën in [bijlage A](#) valt, kun je ervoor kiezen om je melding te laten doorsturen naar een lokaal kanaal (raadpleeg het gedeelte 'Wat kun je melden?' hieronder).
- Neem contact op met [People Solutions](#) via de NIKE HR-website.
- Neem contact op met je NIKE manager of een andere leidinggevende van NIKE.

Je kunt naar de [Speak Up Portal](#) en [naar Zero](#) gaan voor gerelateerde bronnen, waaronder informatie over de verschillende Speak Up kanalen. NIKE biedt ook een link naar de Speak Up Portal op de [investeerderswebsite](#). Je kunt een zorg online melden. Als je dit liever telefonisch doet, krijg je via de Speak Up Portal een gratis telefoonnummer voor het land van waaruit je contact met ons opneemt.

Wie kan een zorg melden?

Iedereen die informatie heeft over een relevante misstand in een werkgerelateerde/professionele context, kan de Speak Up Portal van NIKE gebruiken om een vraag te stellen of een zorg te melden, waaronder:

- Medewerkers, oud-medewerkers en kandidaten van wie het dienstverband nog niet is ingegaan
- Zzp'ers of freelancers
- Aandeelhouders en personen die behoren tot het bestuurs-, leidinggevend of toezichthoudend orgaan, met inbegrip van niet-uitvoerende leden
- Dienstverleners, aannemers, onderaannemers en leveranciers, evenals alle personen die onder hun toezicht en leiding handelen
- Vrijwilligers, onbetaalde medewerkers en stagiairs.

Wat kun je melden?

Je kunt melding maken van daadwerkelijk of vermoed wangedrag of problemen met betrekking tot de gedragscode van NIKE, met inbegrip van, maar niet beperkt tot, discriminatie, vergelding en intimidatie op de werkplek; onethisch zakelijk gedrag; schendingen van de boekhouding en financiële verslaglegging; diefstal, fraude en misbruik van kortingen; zorgen over gezondheid, veiligheid en beveiliging; misbruik of verduistering van informatie; problemen met producten en processen; mensenrechtenschendingen en milieuschendingen.

De Speak Up procedure en de bijbehorende klachtenprocedure zijn echter niet bedoeld voor vragen of klachten over producten, bestellingen of communicatie met de klantenservice. Neem contact op met de [klantenservicekanalen](#) van NIKE.

Als je in België woont, kun je je zorg mogelijk lokaal melden als deze onder een van de categorieën valt die zijn vermeld in bijlage A van deze procedure. Als je ervoor kiest om je zorg lokaal te melden, betekent dit dat je melding wordt doorgestuurd naar de lokaal aangewezen persoon. Die persoon is je aanspreekpunt gedurende het hele Speak Up proces. In België treedt People Solutions op als lokaal aangewezen persoon. Deze rol kan indien nodig worden gedelegeerd aan andere geschikte functies of aan derden.

We raden je aan om het wereldwijde kanaal te blijven gebruiken. Of je er nu voor kiest om je zorg lokaal of wereldwijd te melden, je zorg wordt doorgestuurd naar het juiste kanaal.

Wat gebeurt er na het melden van een zorg via de Speak Up Portal?

Wanneer je je zorg online of telefonisch meldt, krijg je een unieke meldingssleutel en kun je een wachtwoord aanmaken. Met de meldingssleutel en het wachtwoord heb je toegang tot je originele melding, via internet of telefoon. Je kunt ook extra informatie aan je melding toevoegen en de status ervan controleren. We raden je aan om na het indienen van je melding nog eens te kijken of er vervolgvragen zijn gesteld.

Hoe problemen worden afgehandeld

Ongeacht hoe je je zorg meldt, je melding wordt beoordeeld en ter beoordeling toegewezen aan het relevante onderzoeksteam. Er vindt een eerste beoordeling plaats, waarbij je mogelijk de vraag krijgt om aanvullende informatie te verstrekken.

Je wordt geïnformeerd over de uitkomst van de eerste beoordeling en of deze leidt tot het openen van een formeel onderzoek. Indien dit het geval is, en waar mogelijk, word je geïnformeerd over de uitkomst van het onderzoek (met inachtneming van privacy- en geheimhoudingsvereisten).

NIKE zal je melding zo efficiënt mogelijk afhandelen. Elk geval is anders en daarom kan de tijd die nodig is om je melding op te lossen variëren. NIKE streeft ernaar om alle meldingen grondig af te handelen op basis van een redelijke termijn. Voor zorgen die binnen een van de categorieën in bijlage A vallen, ontvang je binnen zeven dagen een ontvangstbevestiging en binnen drie maanden na indiening informatie over de vervolgmaatregelen.

Anoniem blijven

NIKE heeft een contract met een derde partij, NAVEX, om de Speak Up Portal te hosten en om meldingen te ontvangen en te verwerken.

Je kunt je uitspreken en anoniem een zorg melden via de Speak Up Portal. Als je ervoor kiest anoniem te blijven, zal NAVEX geen onderzoek doen naar je identiteit en ervoor zorgen dat je anoniem blijft.

Anonieme melders krijgen toegang tot statusupdates of kunnen controleren of er eventuele vervolgvragen zijn door zich met hun meldingssleutel en wachtwoord aan te melden bij de Speak Up Portal. Als je hier meldingen over wilt ontvangen, kun je een persoonlijk e-mailadres opgeven dat niet wordt opgenomen in je melding aan NIKE.

Hou er rekening mee dat anoniem een probleem melden de mogelijkheden van NIKE kan beperken om je zorgen grondig te onderzoeken, hoewel we dit naar ons beste vermogen zullen doen.

Hoe vertrouwelijkheid en gegevensbescherming worden gewaarborgd

De teams die verantwoordelijk zijn voor het ontvangen en afhandelen van meldingen, behandelen de meldingen strikt vertrouwelijk. Meldingen worden verwerkt op een need-to-know-basis om de identiteit van de melder en genoemde derden te beschermen en om de vertrouwelijkheid van de informatie die in de melding wordt gedeeld te waarborgen.

De beoordeling en het onderzoek van meldingen worden uitgevoerd in overeenstemming met de wettelijke vereisten inzake gegevensbescherming. Informatie over het verzamelen, verwerken en bewaren van persoonsgegevens is te vinden in het [Privacybeleid](#) op de Speak Up Portal.

Bescherming tegen vergelding

NIKE tolereert geen vergelding tegen personen die te goeder trouw een zorg melden, die een melder helpen bij het melden van een zorg, of die deelnemen aan een onderzoek naar een vermoedelijke schending, zelfs niet als de aantijging uiteindelijk ongegrond is.

Extern een melding doen

Als je zorg betrekking heeft op de categorieën die zijn opgenomen in bijlage A, kun je ervoor kiezen om een melding in te dienen bij de volgende bevoegde autoriteiten in België:

- [het Centrum Integriteit \(CINT\) van de federale Ombudsman.](#)

Het wordt echter sterk aanbevolen om mogelijk wangedrag eerst rechtstreeks aan NIKE of de lokaal aangewezen persoon te melden via een van de kanalen die worden genoemd in het gedeelte 'Hoe kan ik een zorg uiten of een melding doen?'. Dit blijft de meest efficiënte manier om NIKE een grondig onderzoek in te laten stellen en gemelde zorgen snel aan te pakken.

Bijlage A

Categorieën van zorgen in het kader van deze klachtenprocedure:

- Overheidsopdrachten
- Financiële diensten, producten en markten
- Witwassen van geld of financiering van terrorisme
- Productveiligheid en -conformiteit
- Veiligheid van vervoer
- Bescherming van het milieu
- Stralingsbescherming en nucleaire veiligheid
- Voedsel- en voederveiligheid
- Diergezondheid en dierenwelzijn
- Volksgezondheid
- Consumentenbescherming
- Privacy en persoonsgegevens; beveiliging van netwerk- en informatiesystemen
- Fiscale en sociale fraude
- Financiële belangen en interne markt van de Europese Unie, met inbegrip van het mededingingsrecht en de vennootschapsbelasting

Procédure de signalement pour la Belgique

Introduction et portée

Chez NIKE, Inc., nous nous engageons à respecter des normes éthiques élevées et à exercer nos activités de façon juste, responsable et durable. Nous attendons aussi de nos partenaires commerciaux qu'ils adhèrent aux mêmes principes de légalité et d'intégrité que NIKE.

Nous avons la conviction qu'une culture basée sur la transparence et l'honnêteté est essentielle pour la réussite à long terme de notre entreprise. Le signalement de conduites qui ne sont pas conformes à nos valeurs et d'éventuelles violations des lois et réglementations en vigueur nous permet de protéger NIKE, nos employé·e·s, partenaires, actionnaires et client·e·s, ainsi que les communautés dans lesquelles nous opérons. Nous traitons les signalements avec sérieux, de façon équitable et rapide, et nous prenons les mesures appropriées pour remédier à ces violations et les prévenir, là où c'est nécessaire.

En cas de conflit entre cette procédure et les lois et réglementations locales, c'est la loi locale qui prévaut.

Comment signaler un problème

Il existe plusieurs façons de signaler un problème.

Voici les différentes possibilités :

- Utiliser le [portail Speak Up](#). Si votre problème s'inscrit dans l'une des catégories énumérées dans l'[Annexe A](#), vous pouvez faire en sorte que votre signalement soit redirigé vers un canal local (reportez-vous à la section « Ce que vous pouvez signaler » ci-dessous).
- Contacter [People Solutions](#) par le biais du site Web HR NIKE.
- Contacter votre manager NIKE ou un ou une responsable NIKE.

Vous pouvez accéder au [portail Speak Up](#) et aller dans [Zero](#) pour trouver des ressources complémentaires, y compris des informations sur les différents canaux Speak Up. NIKE fournit aussi un lien vers le portail Speak Up sur son [site Web dédié à l'investissement](#). Vous pouvez signaler un problème en ligne, ou si vous préférez le faire par téléphone, le portail Speak Up vous fournira un numéro de téléphone gratuit pour le pays depuis lequel vous nous contactez.

Qui peut signaler un problème ?

Toute personne ayant connaissance d'un acte répréhensible dans un contexte professionnel peut utiliser le portail Speak Up de NIKE pour poser une question ou signaler un problème. Par exemple :

- Employé·e·s, ex-employé·e·s et candidat·e·s qui ne font pas encore partie de l'entreprise
- Personnes à leur compte ou freelances
- Actionnaires et personnes faisant partie du conseil d'administration, de direction ou de supervision, y compris les membres non exécutifs
- Prestataires de service, sous-traitants et fournisseurs, ainsi que toute personne agissant sous leur supervision et leur direction
- Bénévoles ou travailleurs et travailleuses/stagiaires ne percevant aucune rémunération.

Ce que vous pouvez signaler

Vous pouvez signaler toute mauvaise conduite ou problème avéré ou suspecté lié au code d'éthique de NIKE, y compris, mais sans s'y limiter, la discrimination, les représailles et le harcèlement sur le lieu de travail ; une conduite commerciale contraire à l'éthique ; des infractions relatives à la comptabilité et aux rapports financiers ; des vols, fraudes et abus de réductions ; des questions de santé, de sûreté et de sécurité ; une utilisation abusive ou le détournement d'informations ; des problèmes liés aux produits et aux processus ; une violation des droits de l'homme et des infractions environnementales.

En revanche, le processus Speak Up et la procédure de signalement qui y est reliée ne sont pas faits pour poser des questions ou se plaindre au sujet de produits, commandes ou problèmes de service client. Ces éléments doivent être transmis aux [canaux du service client](#) NIKE.

Si vous êtes en Belgique, vous pourriez avoir la possibilité de réaliser un signalement local si le problème s'inscrit dans l'une des catégories énumérées dans l'Annexe A de cette procédure. Si vous choisissez de réaliser un signalement local, celui-ci sera transmis à la personne locale désignée, qui sera votre contact tout au long du processus Speak Up. En Belgique, c'est People Solutions qui agira en tant que personne locale désignée. Ce rôle peut être délégué à d'autres fonctions appropriées ou à des tiers si nécessaire.

Nous vous encourageons à continuer à utiliser le canal mondial. Mais que vous choisissiez d'effectuer un signalement au niveau local ou mondial, ce signalement sera redirigé vers le canal approprié.

Que se passe-t-il après le signalement d'un problème sur le portail Speak Up ?

Quand vous signalez un problème en ligne ou par téléphone, vous recevrez une clé de signalement unique et il vous sera demandé de créer un mot de passe. La clé de signalement et le mot de passe vous permettront d'accéder à votre signalement d'origine, par Internet ou par téléphone. Vous pourrez aussi ajouter des détails supplémentaires à votre signalement et suivre son statut. Nous vous invitons à vérifier si des questions complémentaires vous ont été posées après l'envoi de votre signalement.

Comment sont traités les problèmes

Quelle que soit la manière dont vous choisissez de signaler un problème, votre signalement sera trié et transmis à l'équipe d'investigation concernée pour examen. Une évaluation initiale sera effectuée, durant laquelle il peut vous être demandé de fournir des informations supplémentaires.

Nous vous informerons du résultat de l'évaluation initiale et de l'éventuelle ouverture d'une enquête officielle. Dans ce dernier cas, et dans la mesure du possible, nous vous informerons du résultat de l'enquête (sous réserve du respect des règles de confidentialité).

NIKE traitera votre signalement aussi efficacement que possible. Chaque cas est différent et le délai nécessaire à la résolution du problème signalé peut donc varier. NIKE s'efforce de traiter tous les signalements avec soin dans un délai raisonnable. Pour les signalements qui entrent dans l'une des catégories énumérées dans l'Annexe A, vous recevrez un accusé de réception dans les sept jours et des informations sur les mesures prises dans les trois mois suivant le signalement.

Rester anonyme

NIKE fait appel à un prestataire, NAVEX, pour héberger le portail Speak Up et pour recevoir et traiter les signalements.

Vous pouvez signaler un problème de manière anonyme sur le portail Speak Up. Si vous choisissez de rester anonyme, NAVEX ne recherchera pas votre identité et garantira le respect de l'anonymat.

Les personnes effectuant un signalement de manière anonyme peuvent accéder aux informations sur l'évolution du signalement ou vérifier s'il y a des questions complémentaires qui ont été posées, en se connectant au portail Speak Up avec leur clé de signalement et leur mot de passe. Si vous souhaitez recevoir des notifications, vous pouvez indiquer une adresse e-mail personnelle qui ne sera **pas** incluse dans votre signalement à NIKE.

Sachez que tout signalement anonyme peut limiter la capacité de NIKE à enquêter sur les problèmes de manière approfondie, même si nous ferons de notre mieux.

Comment la confidentialité et la protection des données sont-elles assurées ?

Les équipes chargées de recevoir et de traiter les signalements le font de manière strictement confidentielle. Les signalements sont traités selon le principe du « besoin de connaître » pour protéger l'identité de la personne qui est à l'origine du signalement et de toute tierce partie mentionnée, et pour préserver la confidentialité des informations indiquées dans le signalement.

L'examen des signalements et les enquêtes sont effectués conformément à la réglementation en vigueur en matière de confidentialité des données. Les informations concernant la collecte, le traitement et la conservation des données personnelles sont disponibles dans la [Politique de confidentialité](#) sur le portail Speak Up.

Protection contre les représailles

NIKE ne tolère aucune représaille à l'encontre des personnes qui signalent un problème de bonne foi, qui aident une personne à signaler un problème ou qui participent à une enquête sur une infraction présumée, même si l'allégation s'avère finalement infondée.

Effectuer un signalement à un organisme externe

Si votre problème concerne les catégories énumérées dans l'Annexe A, vous pouvez choisir d'adresser un signalement à l'autorité compétente suivante en Belgique :

- [Le Centre Intégrité du Médiateur fédéral](#)

Mais il est fortement recommandé de commencer d'abord par signaler toute mauvaise conduite à NIKE ou directement à la personne locale désignée en utilisant l'un des canaux mentionnés dans la section « Comment signaler un problème ». Ça reste le moyen le plus efficace pour NIKE d'effectuer une enquête approfondie et de résoudre rapidement les problèmes signalés.

Annexe A

Catégories de problèmes entrant dans le cadre de cette procédure de signalement :

- Marchés publics
- Services, produits et marchés financiers
- Blanchiment d'argent et financement du terrorisme
- Sécurité et conformité des produits
- Sécurité des transports
- Protection de l'environnement
- Protection contre les radiations et sécurité nucléaire
- Sécurité alimentaire
- Santé et bien-être animal
- Santé publique
- Protection des consommateurs et consommatrices
- Vie privée et données personnelles ; sécurité des réseaux et des systèmes d'information
- Fraude fiscale et sociale
- Intérêts financiers et marché intérieur de l'Union européenne (y compris loi sur la concurrence et impôts sur les sociétés)

Netherlands Complaint Procedure

Introduction and Scope

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We firmly believe that a culture of openness and honesty is an integral part of our company's long-term success. Reporting conduct that does not align with our values and possible breaches of applicable laws and regulations helps us protect NIKE, our employees, partners, investors and consumers, and the communities in which we operate. We treat reports seriously, fairly and promptly, and we take appropriate action to remedy and prevent violations where needed.

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- Use the [Speak Up Portal](#). If your concern falls under one of the categories listed in [Appendix A](#), you may also choose to have your report routed to a local channel
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You can access the [Speak Up Portal](#) and visit [Zero](#) to find related resources, including information on the various Speak Up channels. NIKE also provides a link to the Speak Up Portal on its [investors website](#). You can report a concern online, or if you prefer to report a concern by phone, the Speak Up Portal will provide you with a toll-free telephone number for the country from which you are contacting us.

If you are located in the Netherlands, you may have the option to report locally if your concern falls under one of the categories listed in [Appendix A](#) of this Procedure. Choosing to report locally means that your report will be directed to the Local Designated Person, who will be your point of contact throughout the Speak Up process. In the Netherlands, People Solutions will act as the Local Designated Person. This role may be delegated to other appropriate functions or third parties as needed.

We encourage you to keep using the global channel. However, whether you choose to report locally or globally, your concern will be directed to the appropriate channel.

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- Volunteers or unpaid workers or trainees.

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You can report any actual or suspected misconduct or concerns relating to NIKE's Code of Ethics, including but not limited to discrimination, retaliation and harassment in the workplace; unethical business conduct; accounting and financial reporting violations; theft, fraud and discount abuse; health, safety and security concerns; misuse or misappropriation of information; product and process concerns; human rights violations and environmental breaches.

Note: “suspected misconduct” means the reasonable belief of wrongdoing based on knowledge gained in a professional context.

However, the Speak Up process and related Complaint Procedure are not intended for questions or complaints about products, orders or customer service-based encounters. These concerns should be addressed to NIKE's [customer service channels](#).

What Happens After Reporting a Concern Using the Speak Up Portal

When you report your concern either online or by telephone, you will be given a unique report key, and you will be asked to create a password. The report key and password will allow you to access your original report, by internet or telephone. You will also be able to add additional details to your report, and monitor its status. You are encouraged to check back after your report has been submitted to see if any follow-up questions have been posed to you.

How Concerns Are Handled

Regardless of how you choose to raise a concern, your report will be triaged and assigned to the relevant investigations team for review. An initial assessment will be carried out, for which you may be asked to provide additional information about your concern.

You will be informed of the outcome of the initial assessment, and whether it leads to the opening of a formal investigation. If so, and where possible, you will be informed of the outcome of the investigation (subject to privacy and confidentiality requirements).

NIKE will handle your report as efficiently as possible. Each case is different and thus the length of time needed to resolve your concern may vary. NIKE strives to handle all reports thoroughly based on a reasonable timeframe. For concerns that fall within one of the categories listed in Appendix A, you will receive an acknowledgement of receipt within seven days and information on follow-up action within three months of filing.

Remaining Anonymous

NIKE contracts with a third-party company, NAVEX, to host the Speak Up Portal, and to receive and process reports.

You may report your concern anonymously on the Speak Up Portal. If you choose to remain anonymous, NAVEX will not pursue your identity and will ensure anonymity is maintained.

Anonymous reporters can access status updates or check for follow-up questions, if any, by logging into the Speak Up Portal with their report key and password. If you would like to receive notifications, you may provide a personal email address that will **not** be included with your report to NIKE.

Please know that reporting anonymously may limit NIKE's ability to thoroughly investigate your concerns, though we will do so to the best of our ability.

How Confidentiality and Data Protection Are Ensured

The teams responsible for receiving and handling reports treat them in strict confidence. Reports are processed on a need-to-know basis to protect the identity of the reporter and any third parties mentioned, and to maintain the confidentiality of information shared in the report.

The review and investigation of reports are carried out in accordance with data privacy legal requirements. Information concerning the collection, processing and retention of personal data can be found in the [Privacy Policy](#) on the Speak Up Portal.

Protection From Retaliation

It is important to handle the reporting of concerns properly and carefully. Ensuring that the reporter is properly protected from harm is therefore essential. NIKE does not tolerate retaliation against any individual who reports in good faith a concern, who assists a reporter in raising a concern, or who participates in any investigation of a suspected violation, even if the allegation is ultimately not substantiated.

If you believe that you are faced with any kind of retaliation in connection with making a report, you may share this with NIKE, the local Designated Person and/or any of the person/function listed under how to raise a concern section, in order for us to investigate and address this appropriately.

Making a Report Externally

Naturally, we strive to create an environment in which you feel safe to make a report internally to NIKE or the Local Designated Person, using any of the channels highlighted in the “How to Raise a Concern” section. We would really like to encourage you to use the formal internal channels, as this will give NIKE the chance to thoroughly investigate the matter and take appropriate action, if needed. In the unlikely event that this is not possible, you can also choose to report your concerns relating to the categories listed in Appendix A to an external organization. Depending on the type of malpractice, you can report it to the following competent authorities in the Netherlands. The websites of the authorities below clearly explain how to do this.

- [House of Whistleblowers \(Huis voor Klokkenluiders\)](#)
- [de Autoriteit Consument en Markt \(ACM\)](#)
- [de Autoriteit Financiële Markten \(AFM\)](#)
- [de Nederlandsche Bank N.V. \(DNB\)](#)
- [de Inspectie gezondheidszorg en jeugd \(IGJ\)](#)
- [de Nederlandse Zorgautoriteit \(NZA\)](#)
- [de Autoriteit Nucleaire Veiligheid en Stralingsbescherming \(ANVS\)](#)
- [de Autoriteit persoonsgegevens \(AP\)](#)
- [de Inspectie Leefomgeving en Transport \(ILT\)](#)
- [de Nederlandse Arbeidsinspectie \(NLA\)](#)
- [de Nederlandse Voedsel- en Warenautoriteit \(NVWA\)](#)

Appendix A

Categories of Concerns within the scope of this Complaint Procedure:

- Public procurement
- Financial services, products and markets
- Money laundering and terrorist financing
- Product safety and compliance
- Transport safety
- Protection of environment
- Radiation protection and nuclear safety
- Food and feed safety
- Animal health and welfare
- Public health
- Consumer protection
- Privacy and personal data; security of network and information systems
- Financial interests and internal market of the European Union, including competition law and corporate taxation

Klachtenprocedure Nederland

Inleiding en bereik

Bij NIKE, Inc. streven we ernaar zaken te doen volgens ethische normen en onze activiteiten op een eerlijke, verantwoordelijke en duurzame manier uit te voeren. We verwachten ook van onze zakenpartners dat ze zich houden aan dezelfde principes voor wettigheid en integriteit als NIKE.

Wij zijn ervan overtuigd dat een cultuur van openheid en eerlijkheid een integraal onderdeel is van het succes van ons bedrijf op lange termijn. Door gedrag dat niet in overeenstemming is met onze waarden en mogelijke schendingen van toepasselijke wet- en regelgeving te melden, kunnen we NIKE, onze medewerkers, partners, investeerders en consumenten beschermen, evenals de community's waarin we actief zijn. We behandelen meldingen serieus, eerlijk en snel, en waar nodig nemen we passende maatregelen om schendingen te verhelpen en te voorkomen.

Als deze procedure in strijd is met lokaal toepasselijke wet- en regelgeving, prevaleert de lokale wetgeving.

Hoe kan ik een zorg uiten of een melding doen?

Er zijn meerdere manieren om zorgen te melden.

Je kunt kiezen uit de volgende opties:

- Gebruik de [Speak Up Portal](#). Als je zorg onder een van de categorieën in [bijlage A](#) valt, kun je ervoor kiezen om je melding te laten doorsturen naar een lokaal kanaal (raadpleeg het gedeelte 'Wat kun je melden?' hieronder).
- Neem contact op met [People Solutions](#) via de NIKE HR-website.
- Neem contact op met je NIKE manager of een NIKE leidinggevende.

Je kunt naar de [Speak Up Portal](#) en [naar Zero](#) gaan voor gerelateerde bronnen, waaronder informatie over de verschillende Speak Up kanalen. NIKE biedt ook een link naar de Speak Up Portal op de [investeerderswebsite](#). Je kunt een zorg online melden. Als je dit liever telefonisch doet, krijg je via de Speak Up Portal een gratis telefoonnummer voor het land van waaruit je contact met ons opneemt.

Wie kan een zorg melden?

Iedereen die informatie heeft over een relevante misstand in een werkgerelateerde/professionele context, kan de Speak Up Portal van NIKE gebruiken om een vraag te stellen of een zorg te melden, waaronder:

- Medewerkers, oud-medewerkers en kandidaten van wie het dienstverband nog niet is ingegaan
- Zzp'ers of freelancers
- Aandeelhouders en personen die behoren tot het bestuurs-, leidinggevend of toezichthoudend orgaan, met inbegrip van niet-uitvoerende leden
- Dienstverleners, aannemers, onderaannemers en leveranciers, evenals alle personen die onder hun toezicht en leiding handelen
- Vrijwilligers, onbetaalde medewerkers of stagiairs.

Wat kun je melden?

Je kunt melding maken van persoonlijk of vermoedelijk wangedrag of problemen met betrekking tot de gedragscode van NIKE, met inbegrip van, maar niet beperkt tot, discriminatie, vergelding en intimidatie op de werkplek; onethisch zakelijk gedrag; schendingen van de boekhouding en financiële verslaglegging; diefstal, fraude en misbruik van kortingen; zorgen over gezondheid, veiligheid en beveiliging; misbruik of verduistering van informatie; problemen met producten en processen; mensenrechtenschendingen en milieuschendingen.

Opmerking: 'vermoedelijk wangedrag' betekent de redelijke overtuiging van wangedrag op basis van kennis die is opgedaan in een professionele context.

De Speak Up procedure en de bijbehorende klachtenprocedure zijn echter niet bedoeld voor vragen of klachten over producten, bestellingen of communicatie met de klantenservice. Neem contact op met de [klantenservicekanalen](#) van NIKE.

Als je in Nederland woont, kun je je zorg mogelijk lokaal melden als deze onder een van de categorieën valt die zijn vermeld in bijlage A van deze procedure. Als je ervoor kiest om je zorg lokaal te melden, betekent dit dat je melding wordt doorgestuurd naar de lokaal aangewezen persoon. Die persoon is je aanspreekpunt gedurende het hele Speak Up proces. In Nederland treedt People Solutions op als lokaal aangewezen persoon. Deze rol kan indien nodig worden gedelegeerd aan andere geschikte functies of aan derden.

We raden je aan om het wereldwijde kanaal te blijven gebruiken. Of je er nu voor kiest om je zorg lokaal of wereldwijd te melden, je zorg wordt doorgestuurd naar het juiste kanaal.

Wat gebeurt er na het melden van een zorg via de Speak Up Portal?

Wanneer je je zorg online of telefonisch meldt, krijg je een unieke meldingssleutel en kun je een wachtwoord aanmaken. Met de meldingssleutel en het wachtwoord heb je toegang tot je originele melding, via internet of telefoon. Je kunt ook extra informatie aan je melding toevoegen en de status ervan controleren. We raden je aan om na het indienen van je melding nog eens te kijken of er vervolgvragen zijn gesteld.

Hoe problemen worden afgehandeld

Ongeacht hoe je je zorg meldt, je melding wordt beoordeeld en ter beoordeling toegewezen aan het relevante onderzoeksteam. Er vindt een eerste beoordeling plaats, waarbij je mogelijk de vraag krijgt om aanvullende informatie te verstrekken.

Je wordt geïnformeerd over de uitkomst van de eerste beoordeling en of deze leidt tot het openen van een formeel onderzoek. Indien dit het geval is, en waar mogelijk, word je geïnformeerd over de uitkomst van het onderzoek (met inachtneming van privacy- en geheimhoudingsvereisten).

NIKE zal je melding zo efficiënt mogelijk afhandelen. Elk geval is anders en daarom kan de tijd die nodig is om je melding op te lossen variëren. NIKE streeft ernaar om alle meldingen grondig af te handelen op basis van een redelijke termijn. Voor zorgen die binnen een van de categorieën in bijlage A vallen, ontvang je

binnen zeven dagen een ontvangstbevestiging en binnen drie maanden na indiening informatie over de vervolgmaatregelen.

Anoniem blijven

NIKE heeft een contract met een derde partij, NAVEX, om de Speak Up Portal te hosten en om meldingen te ontvangen en te verwerken.

Je kunt je uitspreken en anoniem een zorg melden via de Speak Up Portal. Als je ervoor kiest anoniem te blijven, zal NAVEX geen onderzoek doen naar je identiteit en ervoor zorgen dat je anoniem blijft.

Anonieme melders krijgen toegang tot statusupdates of kunnen controleren of er eventuele vervolgvragen zijn door zich met hun meldingssleutel en wachtwoord aan te melden bij de Speak Up Portal. Als je hier meldingen over wilt ontvangen, kun je een persoonlijk e-mailadres opgeven dat **niet** wordt opgenomen in je melding aan NIKE.

Hou er rekening mee dat anoniem een probleem melden de mogelijkheden van NIKE kan beperken om je zorgen grondig te onderzoeken, hoewel we dit naar ons beste vermogen zullen doen.

Hoe vertrouwelijkheid en gegevensbescherming worden gewaarborgd

De teams die verantwoordelijk zijn voor het ontvangen en afhandelen van meldingen, behandelen de meldingen strikt vertrouwelijk. Meldingen worden verwerkt op een need-to-know-basis om de identiteit van de melder en genoemde derden te beschermen en om de vertrouwelijkheid van de informatie die in de melding wordt gedeeld te waarborgen.

De beoordeling en het onderzoek van meldingen worden uitgevoerd in overeenstemming met de wettelijke vereisten inzake gegevensbescherming. Informatie over het verzamelen, verwerken en bewaren van persoonsgegevens is te vinden in het [Privacybeleid](#) op de Speak Up Portal.

Bescherming tegen vergelding

NIKE tolereert geen vergelding tegen personen die te goeder trouw een zorg melden, die een melder helpen bij het melden van een zorg, of die deelnemen aan een onderzoek naar een vermoedelijke schending, zelfs niet als de aantijging uiteindelijk ongegrond is.

Extern een melding doen

Als je zorg betrekking heeft op de categorieën die zijn opgenomen in bijlage A, kun je ervoor kiezen om een melding in te dienen bij de volgende bevoegde autoriteiten in Nederland:

- [Huis voor Klokkenluiders](#)
- [de Autoriteit Consument en Markt \(ACM\)](#)
- [de Autoriteit Financiële Markten \(AFM\)](#)
- [de Nederlandsche Bank N.V. \(DNB\)](#)

- [de Inspectie gezondheidszorg en jeugd \(IGJ\)](#)
- [de Nederlandse Zorgautoriteit \(NZa\)](#)
- [de Autoriteit Nucleaire Veiligheid en Stralingsbescherming \(ANVS\)](#)
- [de Autoriteit persoonsgegevens \(AP\)](#)
- [de Inspectie Leefomgeving en Transport \(ILT\)](#)
- [de Nederlandse Arbeidsinspectie \(NLA\)](#)
- [de Nederlandse Voedsel- en Warenautoriteit \(NVWA\)](#)

Het wordt echter sterk aanbevolen om mogelijk wangedrag eerst rechtstreeks aan NIKE of de lokaal aangewezen persoon te melden via een van de kanalen die worden genoemd in het gedeelte 'Hoe doe je een melding?'. Dit blijft de meest efficiënte manier om NIKE een grondig onderzoek in te laten stellen en gemelde zorgen snel aan te pakken.

Bijlage A

Categorieën van zorgen in het kader van deze klachtenprocedure:

- Overheidsopdrachten
- Financiële diensten, producten en markten
- Witwassen van geld, financiering van terrorisme
- Productveiligheid en -conformiteit
- Veiligheid van vervoer
- Bescherming van het milieu
- Stralingsbescherming en nucleaire veiligheid
- Voedsel- en voederveiligheid
- Diergezondheid en dierenwelzijn
- Volksgezondheid
- Consumentenbescherming
- Privacy en persoonsgegevens; beveiliging van netwerk- en informatiesystemen
- Financiële belangen en interne markt van de Europese Unie, met inbegrip van het mededingingsrecht en de vennootschapsbelasting

France Complaint Procedure

Introduction and Scope

At NIKE, Inc. we are committed to doing business with high ethical standards and carrying out our activities in a fair, responsible and sustainable way. We also expect our business partners to adhere to the same principles of legality and integrity to which NIKE holds itself.

We firmly believe that a culture of openness and honesty is an integral part of our company's long-term success. Reporting conduct that does not align with our values and possible breaches of applicable laws and regulations helps us protect NIKE, our employees, partners, investors and consumers, and the communities in which we operate. We treat reports seriously, fairly and promptly, and we take appropriate action to remedy and prevent violations where needed.

If this Procedure conflicts with locally applicable laws and regulations, local law shall prevail.

How to Raise a Concern

There are multiple ways to report a concern.

You may choose to:

- Use the [Speak Up Portal](#). If your concern falls under one of the categories listed in Appendix A, you may choose to have your report routed to a local channel (refer to the “What You Can Report” section below).
- Contact [People Solutions](#) through the NIKE HR website.
- Contact your NIKE manager or any NIKE leader.

You can access the [Speak Up Portal](#) and visit [Zero](#) to find related resources, including information on the various Speak Up channels. NIKE also provides a link to the Speak Up Portal on its [investors website](#). You can report a concern online, or if you prefer to report a concern by phone, the Speak Up Portal will provide you with a toll-free telephone number for the country from which you are contacting us.

Who Can Report a Concern

Anyone who acquired information on a relevant wrongdoing in a work-related/professional context can use NIKE's Speak Up Portal to ask a question or report a concern, including:

- Employees, former employees and candidates whose employment has not started
- Self-employed professionals or freelancers
- Shareholders and persons belonging to the administrative, management or supervisory body, including non-executive members
- Service providers, contractors, subcontractors and suppliers, as well as any persons acting under their supervision and direction
- Volunteers or unpaid workers or trainees.

What You Can Report

You can report any actual or suspected misconduct or concerns relating to NIKE's Code of Ethics, including but not limited to discrimination, retaliation and harassment in the workplace; unethical business conduct; accounting and financial reporting violations; theft, fraud and discount abuse; health, safety and security concerns; misuse or misappropriation of information; product and process concerns; human rights violations and environmental breaches.

However, the Speak Up process and related Complaint Procedure are not intended for questions or complaints about products, orders or customer service-based encounters. These concerns should be addressed to NIKE's [customer service channels](#).

If you are located in France, you may have the option to report locally if your concern falls under one of the categories listed in Appendix A of this Procedure. Choosing to report locally means that your report will be directed to the Local Designated Person, who will be your point of contact throughout the Speak Up process. In France, People Solutions will act as the Local Designated Person. This role may be delegated to other appropriate functions or third parties as needed.

We encourage you to keep using the global channel. However, whether you choose to report locally or globally, your concern will be directed to the appropriate channel.

What Happens After Reporting a Concern Using the Speak Up Portal

When you report your concern either online or by telephone, you will be given a unique report key, and you will be asked to create a password. The report key and password will allow you to access your original report, by internet or telephone. You will also be able to add additional details to your report, and monitor its status. You are encouraged to check back after your report has been submitted to see if any follow-up questions have been posed to you.

How Concerns Are Handled

Regardless of how you choose to raise a concern, your report will be triaged and assigned to the relevant investigations team for review. An initial assessment will be carried out, for which you may be asked to provide additional information about your concern.

You will be informed of the outcome of the initial assessment, and whether it leads to the opening of a formal investigation. If so, and where possible, you will be informed of the outcome of the investigation (subject to privacy and confidentiality requirements).

NIKE will handle your report as efficiently as possible. Each case is different and thus the length of time needed to resolve your concern may vary. NIKE strives to handle all reports thoroughly based on a reasonable timeframe. For concerns that fall within one of the categories listed in Appendix A, you will receive an acknowledgement of receipt within seven days and information on follow-up action within three months of filing.

Remaining Anonymous

NIKE contracts with a third-party company, NAVEX, to host the Speak Up Portal, and to receive and process reports.

You may report your concern anonymously on the Speak Up Portal. If you choose to remain anonymous, NAVEX will not pursue your identity and will ensure anonymity is maintained.

Anonymous reporters can access status updates or check for follow-up questions, if any, by logging into the Speak Up Portal with their report key and password. If you would like to receive notifications, you may provide a personal email address that will **not** be included with your report to NIKE.

Please know that reporting anonymously may limit NIKE's ability to thoroughly investigate your concerns, though we will do so to the best of our ability.

How Confidentiality and Data Protection Are Ensured

The teams responsible for receiving and handling reports treat them in strict confidence. Reports are processed on a need-to-know basis to protect the identity of the reporter and any third parties mentioned, and to maintain the confidentiality of information shared in the report.

The review and investigation of reports are carried out in accordance with data privacy legal requirements. Information concerning the collection, processing and retention of personal data can be found in the [Privacy Policy](#) on the Speak Up Portal.

Protection From Retaliation

NIKE does not tolerate retaliation against any individual who reports in good faith a concern, who assists a reporter in raising a concern, or who participates in any investigation of a suspected violation, even if the allegation is ultimately not substantiated.

Making a Report Externally

If your concern relates to the categories listed in Appendix A, you may choose to submit a report to the following competent authorities in France:

- [Defender of Rights](#)
- [Whistleblower Guide](#): competent authorities are listed on pages 42-44

However, it is strongly recommended to first report possible misconduct to NIKE or the Local Designated Person directly, using any of the channels highlighted in the “How to Raise a Concern?” section. This remains the most efficient way to allow NIKE to thoroughly investigate and promptly address reported issues.

Appendix A

Categories of Concerns within the scope of this Complaint Procedure:

- The facts reported have occurred or are likely to occur within NIKE or in connection with its activities, and relate to:
 - a crime or an offense,
 - a threat or harm to the public interest, or
 - a breach or an attempt to cover up a breach of an applicable law, regulation or an international treaty.
- Examples of situations covered by this Procedure:
 - Corruption, bribery and influence peddling
 - Fraud, theft, embezzlement of public or private funds
 - Money laundering and terrorist financing
 - Health, safety and security breaches
 - Environmental violations
 - Discrimination, bullying and harassment
 - Forced and child labor
 - Privacy and personal data breaches
 - Anticompetitive practices
 - Failure to comply with export controls, economic sanctions and embargoes
 - Product noncompliance

Procédure de signalement pour la France

Introduction et portée

Chez NIKE, Inc., nous nous engageons à respecter des normes éthiques élevées et à exercer nos activités de façon juste, responsable et durable. Nous attendons aussi de nos partenaires commerciaux qu'ils adhèrent aux mêmes principes de légalité et d'intégrité que NIKE.

Nous avons la conviction qu'une culture basée sur la transparence et l'honnêteté est essentielle pour la réussite à long terme de notre entreprise. Le signalement de conduites qui ne sont pas conformes à nos valeurs et d'éventuelles violations des lois et réglementations en vigueur nous permet de protéger NIKE, nos employé-e-s, partenaires, actionnaires et client-e-s, ainsi que les communautés dans lesquelles nous opérons. Nous traitons les signalements avec sérieux, de façon équitable et rapide, et nous prenons les mesures appropriées pour remédier à ces violations et les prévenir, là où c'est nécessaire.

En cas de conflit entre cette procédure et les lois et réglementations locales, c'est la loi locale qui prévaut.

Comment signaler un problème

Il existe plusieurs façons de signaler un problème.

Voici les différentes possibilités :

- Utiliser le [portail Speak Up](#). Si votre problème s'inscrit dans l'une des catégories énumérées dans l'Annexe A, vous pouvez faire en sorte que votre signalement soit redirigé vers un canal local (reportez-vous à la section « Ce que vous pouvez signaler » ci-dessous).
- Contacter [People Solutions](#) par le biais du site Web HR NIKE.
- Contacter votre manager NIKE ou un ou une responsable NIKE.

Vous pouvez accéder au [portail Speak Up](#) et aller dans [Zero](#) pour trouver des ressources complémentaires, y compris des informations sur les différents canaux Speak Up. NIKE fournit aussi un lien vers le portail Speak Up sur son [site Web dédié à l'investissement](#). Vous pouvez signaler un problème en ligne, ou si vous préférez le faire par téléphone, le portail Speak Up vous fournira un numéro de téléphone gratuit pour le pays depuis lequel vous nous contactez.

Qui peut signaler un problème ?

Toute personne ayant connaissance d'un acte répréhensible dans un contexte professionnel peut utiliser le portail Speak Up de NIKE pour poser une question ou signaler un problème. Par exemple :

- Employé-e-s, ex-employé-e-s et candidat-e-s qui ne font pas encore partie de l'entreprise
- Personnes à leur compte ou freelances
- Actionnaires et personnes faisant partie du conseil d'administration, de direction ou de supervision, y compris les membres non exécutifs
- Prestataires de service, sous-traitants et fournisseurs, ainsi que toute personne agissant sous leur supervision et leur direction
- Bénévoles ou travailleurs et travailleuses/stagiaires ne percevant aucune rémunération.

Ce que vous pouvez signaler

Vous pouvez signaler toute mauvaise conduite ou problème avéré ou suspecté lié au code d'éthique de NIKE, y compris, mais sans s'y limiter, la discrimination, les représailles et le harcèlement sur le lieu de travail ; une conduite commerciale contraire à l'éthique ; des infractions relatives à la comptabilité et aux rapports financiers ; des vols, fraudes et abus de réductions ; des questions de santé, de sûreté et de sécurité ; une utilisation abusive ou le détournement d'informations ; des problèmes liés aux produits et aux processus ; une violation des droits de l'homme et des infractions environnementales.

En revanche, le processus Speak Up et la procédure de signalement qui y est reliée ne sont pas faits pour poser des questions ou se plaindre au sujet de produits, commandes ou problèmes de service client. Ces éléments doivent être transmis aux [canaux du service client](#) NIKE.

Si vous êtes en France, vous pourriez avoir la possibilité de réaliser un signalement local si le problème s'inscrit dans l'une des catégories énumérées dans l'Annexe A de cette procédure. Si vous choisissez de réaliser un signalement local, celui-ci sera transmis à la personne locale désignée, qui sera votre contact tout au long du processus Speak Up. En France, c'est People Solutions qui agira en tant que personne locale désignée. Ce rôle peut être délégué à d'autres fonctions appropriées ou à des tiers si nécessaire.

Nous vous encourageons à continuer à utiliser le canal mondial. Mais que vous choisissiez d'effectuer un signalement au niveau local ou mondial, ce signalement sera redirigé vers le canal approprié.

Que se passe-t-il après le signalement d'un problème sur le portail Speak Up ?

Quand vous signalez un problème en ligne ou par téléphone, vous recevrez une clé de signalement unique et il vous sera demandé de créer un mot de passe. La clé de signalement et le mot de passe vous permettront d'accéder à votre signalement d'origine, par Internet ou par téléphone. Vous pourrez aussi ajouter des détails supplémentaires à votre signalement et suivre son statut. Nous vous invitons à vérifier si des questions complémentaires vous ont été posées après l'envoi de votre signalement.

Comment sont traités les problèmes

Quelle que soit la manière dont vous choisissez de signaler un problème, votre signalement sera trié et transmis à l'équipe d'investigation concernée pour examen. Une évaluation initiale sera effectuée, durant laquelle il peut vous être demandé de fournir des informations supplémentaires.

Nous vous informerons du résultat de l'évaluation initiale et de l'éventuelle ouverture d'une enquête officielle. Dans ce dernier cas, et dans la mesure du possible, nous vous informerons du résultat de l'enquête (sous réserve du respect des règles de confidentialité).

NIKE traitera votre signalement aussi efficacement que possible. Chaque cas est différent et le délai nécessaire à la résolution du problème signalé peut donc varier. NIKE s'efforce de traiter tous les signalements avec soin dans un délai raisonnable. Pour les signalements qui entrent dans l'une des catégories énumérées dans l'Annexe A, vous recevrez un accusé de réception dans les sept jours et des informations sur les mesures prises dans les trois mois suivant le signalement.

Rester anonyme

NIKE fait appel à un prestataire, NAVEX, chargé d'héberger le portail Speak Up et de recevoir et traiter les signalements.

Vous pouvez signaler un problème de manière anonyme sur le portail Speak Up. Si vous choisissez de rester anonyme, NAVEX ne recherchera pas votre identité et garantira le respect de l'anonymat.

Les personnes effectuant un signalement de manière anonyme peuvent accéder aux informations sur l'évolution du signalement ou vérifier s'il y a des questions complémentaires qui ont été posées, en se connectant au portail Speak Up avec leur clé de signalement et leur mot de passe. Si vous souhaitez recevoir des notifications, vous pouvez indiquer une adresse e-mail personnelle qui ne sera **pas** incluse dans votre signalement à NIKE.

Sachez que tout signalement anonyme peut limiter la capacité de NIKE à enquêter sur les problèmes de manière approfondie, même si nous ferons de notre mieux.

Comment la confidentialité et la protection des données sont-elles assurées ?

Les équipes chargées de recevoir et de traiter les signalements le font de manière strictement confidentielle. Les signalements sont traités selon le principe de « besoin de connaître » pour protéger l'identité de la personne qui est à l'origine du signalement et de toute tierce partie mentionnée, et pour préserver la confidentialité des informations indiquées dans le signalement.

L'examen des signalements et les enquêtes sont effectués conformément à la réglementation en vigueur en matière de confidentialité des données. Les informations concernant la collecte, le traitement et la conservation des données personnelles sont disponibles dans la [Politique de confidentialité](#) sur le portail Speak Up.

Protection contre les représailles

NIKE ne tolère aucune représaille à l'encontre des personnes qui signalent un problème de bonne foi, qui aident une personne à signaler un problème ou qui participent à une enquête sur une infraction présumée, même si l'allégation s'avère finalement infondée.

Effectuer un signalement à un organisme externe

Si votre problème concerne les catégories énumérées dans l'Annexe A, vous pouvez choisir d'adresser un signalement aux autorités compétentes suivantes en France :

- [Défenseur des droits](#)
- [Guide du lanceur d'alerte](#) : les autorités compétentes sont énumérées aux pages 42 à 44

Mais il est fortement recommandé de commencer par signaler toute mauvaise conduite à NIKE ou directement à la personne locale désignée en utilisant l'un des canaux mentionnés dans la section « Comment signaler un problème ». Cela reste le moyen le plus efficace pour permettre à NIKE d'effectuer une enquête approfondie et de résoudre rapidement les problèmes signalés.

Annexe A

Catégories de problèmes entrant dans le cadre de cette procédure de signalement :

- Les faits signalés se sont produits ou sont susceptibles de se produire au sein de l'entreprise NIKE ou dans le cadre de ses activités, et sont liés à :
 - un délit ou une infraction,
 - une menace ou un préjudice à l'intérêt public, ou
 - une violation ou une tentative de dissimulation de la violation d'une loi, réglementation ou d'un traité international en vigueur.
- Exemples de situations couvertes par cette procédure :
 - Corruption, subornation et trafic d'influence
 - Fraude, vol, détournement de fonds publics ou privés
 - Blanchiment d'argent et financement du terrorisme
 - Atteintes à la santé, à la sûreté et à la sécurité
 - Infractions environnementales
 - Discrimination, intimidation et harcèlement
 - Travail forcé et travail des enfants
 - Non-respect de la confidentialité et des données personnelles
 - Pratiques anticoncurrentielles
 - Non-respect des contrôles à l'exportation, des sanctions économiques et des embargos
 - Non-conformité de produits

Italy Complaint Procedure

Introduction and Scope

At NIKE, Inc. we are committed to doing business with high ethical standards and carrying out our activities in a fair, responsible and sustainable way. We also expect our business partners to adhere to the same principles of legality and integrity to which NIKE holds itself.

We firmly believe that a culture of openness and honesty is an integral part of our company's long-term success. Reporting conduct that does not align with our values and possible breaches of applicable laws and regulations helps us protect NIKE, our employees, partners, investors and consumers, and the communities in which we operate. We treat reports seriously, fairly and promptly, and we take appropriate action to remedy and prevent violations where needed.

If this Procedure conflicts with locally applicable laws and regulations, local law shall prevail.

How to Raise a Concern

There are multiple ways to report a concern.

You may choose to:

- Use the [Speak Up Portal](#). If your concern falls under one of the categories listed in Appendix A, you may choose to have your report routed to a local channel (refer to the "What You Can Report" section below).
- Contact [People Solutions](#) through the NIKE HR website.
- Contact your NIKE manager or any NIKE leader.

You can access the [Speak Up Portal](#) and visit [Zero](#) to find related resources, including information on the various Speak Up channels. NIKE also provides a link to the Speak Up Portal on its [investors website](#). You can report a concern online, or if you prefer to report a concern by phone, the Speak Up Portal will provide you with a toll-free telephone number for the country from which you are contacting us.

Who Can Report a Concern

Anyone who acquired information on a relevant wrongdoing in a work-related/professional context can use NIKE's Speak Up Portal to ask a question or report a concern, including:

- Employees, former employees and candidates whose employment has not started
- Self-employed professionals or freelancers
- Shareholders and persons belonging to the administrative, management or supervisory body, including non-executive members
- Service providers, contractors, subcontractors and suppliers, as well as any persons acting under their supervision and direction
- Volunteers or unpaid workers or trainees.

What You Can Report

You can report any actual or suspected misconduct or concerns relating to NIKE's Code of Ethics, including but not limited to discrimination, retaliation and harassment in the workplace; unethical business conduct; accounting and financial reporting violations; theft, fraud and discount abuse; health, safety and security concerns; misuse or misappropriation of information; product and process concerns; human rights violations and environmental breaches.

However, the Speak Up process and related Complaint Procedure are not intended for questions or complaints about products, orders or customer service-based encounters. These concerns should be addressed to NIKE's [customer service channels](#).

If you are located in Italy, you may have the option to report locally if your concern falls under one of the categories listed in Appendix A of this Procedure. Choosing to report locally means that your report will be directed to the Local Designated Person, who will be your point of contact throughout the Speak Up process. In Italy, People Solutions will act as the Local Designated Person. This role may be delegated to other appropriate functions or third parties as needed.

We encourage you to keep using the global channel. However, whether you choose to report locally or globally, your concern will be directed to the appropriate channel.

What Happens After Reporting a Concern Using the Speak Up Portal

When you report your concern either online or by telephone, you will be given a unique report key, and you will be asked to create a password. The report key and password will allow you to access your original report, by internet or telephone. You will also be able to add additional details to your report, and monitor its status. You are encouraged to check back after your report has been submitted to see if any follow-up questions have been posed to you.

How Concerns Are Handled

Regardless of how you choose to raise a concern, your report will be triaged and assigned to the relevant investigations team for review. An initial assessment will be carried out, for which you may be asked to provide additional information about your concern.

You will be informed of the outcome of the initial assessment, and whether it leads to the opening of a formal investigation. If so, and where possible, you will be informed of the outcome of the investigation (subject to privacy and confidentiality requirements).

NIKE will handle your report as efficiently as possible. Each case is different and thus the length of time needed to resolve your concern may vary. NIKE strives to handle all reports thoroughly based on a reasonable timeframe. For concerns that fall within one of the categories listed in Appendix A, you will receive an acknowledgement of receipt within seven days and information on follow-up action within three months of filing.

Remaining Anonymous

NIKE contracts with a third-party company, NAVEX, to host the Speak Up Portal, and to receive and process reports.

You may report your concern anonymously on the Speak Up Portal. If you choose to remain anonymous, NAVEX will not pursue your identity and will ensure anonymity is maintained.

Anonymous reporters can access status updates or check for follow-up questions, if any, by logging into the Speak Up Portal with their report key and password. If you would like to receive notifications, you may provide a personal email address that will **not** be included with your report to NIKE.

Please know that reporting anonymously may limit NIKE's ability to thoroughly investigate your concerns, though we will do so to the best of our ability.

How Confidentiality and Data Protection Are Ensured

The teams responsible for receiving and handling reports treat them in strict confidence. Reports are processed on a need-to-know basis to protect the identity of the reporter and any third parties mentioned, and to maintain the confidentiality of information shared in the report.

The review and investigation of reports are carried out in accordance with data privacy legal requirements. Information concerning the collection, processing and retention of personal data can be found in the [Privacy Policy](#) on the Speak Up Portal.

Protection From Retaliation

NIKE does not tolerate retaliation against any individual who reports in good faith a concern, who assists a reporter in raising a concern, or who participates in any investigation of a suspected violation, even if the allegation is ultimately not substantiated.

Making a Report Externally

If your concern relates to the categories listed in Appendix A, you may choose to submit a report to the following competent authority in Italy:

- [Italian National Anti-Corruption Authority \(Autorità Nazionale Anticorruzione \(ANAC\)\)](#)

However, it is strongly recommended to first report possible misconduct to NIKE or the Local Designated Person directly, using any of the channels highlighted in the “How to Raise a Concern” section. This remains the most efficient way to allow NIKE to thoroughly investigate and promptly address reported issues.

Appendix A

Categories of Concerns within the scope of this Complaint Procedure:

- Public procurement
- Financial services, products and markets
- Money laundering and terrorist financing
- Product safety and compliance
- Transport safety
- Protection of environment
- Radiation protection and nuclear safety
- Food and feed safety
- Animal health and welfare
- Public health
- Consumer protection
- Privacy and personal data; security of network and information systems
- Financial interests and internal market of the European Union, including competition law and corporate taxation
- Unlawful conduct pursuant to Legislative Decree no. 231 of 8 June 2001, or violations of related organization and management models
- Other administrative, accounting, civil or criminal offenses that harm the public interest or NIKE's integrity

Procedura di reclamo per l'Italia

Introduzione e ambito di applicazione

Noi di NIKE, Inc. ci impegniamo a operare nel rispetto di elevati standard etici e a svolgere le nostre attività in modo equo, responsabile e sostenibile. Ci aspettiamo inoltre che i nostri partner commerciali rispettino gli stessi principi di legalità e integrità a cui tiene fede NIKE.

Siamo fermamente convinti che una cultura basata su apertura e onestà sia parte integrante del successo a lungo termine della nostra azienda. La segnalazione di comportamenti non in linea con i nostri valori e di possibili violazioni delle leggi e delle normative in vigore ci aiuta a proteggere NIKE, i nostri dipendenti, partner, investitori e clienti, oltre alle comunità in cui operiamo. Trattiamo le segnalazioni con serietà, equità e tempestività e, ove necessario, adottiamo le misure appropriate per porre rimedio alle violazioni e prevenirle.

Se la presente procedura è in conflitto con le leggi e le normative in vigore a livello locale, prevale la legge locale.

Come segnalare un problema

Per segnalare un problema si possono seguire diverse strade.

Hai le seguenti possibilità:

- Usare il [portale Speak Up](#). Se il problema rientra in una delle categorie riportate nell'Appendice A, puoi scegliere di inoltrare la segnalazione a un canale locale (consulta la sezione "Cosa è possibile segnalare" qui sotto).
- Contattare [People Solutions](#) tramite il sito web NIKE HR.
- Contattare i Manager NIKE o i Leader NIKE.

È possibile accedere al [portale Speak Up](#) e visitare [Zero](#) per trovare le risorse correlate, incluse le informazioni sui vari canali Speak Up. NIKE mette anche a disposizione un link al portale Speak Up sul [sito web dedicato agli investitori](#). Puoi segnalare un problema online oppure, se preferisci, per telefono. Il portale Speak Up ti fornirà un numero verde gratuito per il Paese da cui ci stai contattando.

Chi può segnalare un problema

Chiunque abbia acquisito informazioni su un comportamento illecito rilevante in un contesto lavorativo/professionale può utilizzare il portale Speak Up di NIKE per fare una domanda o segnalare un problema, tra cui:

- dipendenti, ex dipendenti e candidati il cui rapporto di lavoro non è iniziato;
- lavoratori autonomi o liberi professionisti;
- azionisti e persone appartenenti all'organo amministrativo, direttivo o di sorveglianza, compresi i membri senza incarichi esecutivi;
- fornitori di servizi, contractor, subcontractor e fornitori, nonché qualsiasi persona che agisca sotto la supervisione e la direzione di questi ultimi;
- volontari, lavoratori non retribuiti o apprendisti.

Cosa è possibile segnalare

Puoi segnalare qualsiasi cattiva condotta effettiva o sospetta oppure problemi legati al Codice etico di NIKE, inclusi a titolo esemplificativo i seguenti fatti: discriminazione, ritorsione e molestie sul luogo di lavoro; condotta aziendale non etica; violazioni della rendicontazione finanziaria e contabile; furti, frodi e abusi degli sconti; problemi legati a salute e sicurezza; uso improprio o appropriazione indebita di informazioni; problemi riguardanti i prodotti e i processi; violazioni dei diritti umani e a livello ambientale.

Tuttavia, il processo Speak Up e la relativa procedura di reclamo non sono per domande o reclami in relazione a prodotti, ordini e incontri basati sull'assistenza clienti. Tali problemi possono essere indirizzati ai [canali assistenza clienti](#) di NIKE.

Se sei in Italia, puoi avere la possibilità di effettuare una segnalazione a livello locale se il problema rientra in una delle categorie riportate nell'Appendice A di questa procedura. Scegliere di procedere a livello locale significa che la segnalazione sarà indirizzata alla persona designata a livello locale, che sarà il punto di contatto per tutto il processo Speak Up. In Italia, People Solutions fungerà da persona designata a livello locale. Questo ruolo può essere delegato ad altre funzioni appropriate o a terze parti, a seconda delle necessità.

Ti invitiamo a continuare a utilizzare il canale globale. Tuttavia, che tu scelga di effettuare la segnalazione a livello locale o globale, il tuo problema sarà indirizzato al canale appropriato.

Cosa succede dopo aver segnalato un problema tramite il portale Speak Up

Quando segnali un problema online o per telefono, ti verrà fornita una chiave univoca e ti verrà richiesto di creare una password. La chiave e la password ti consentiranno di accedere alla tua segnalazione originale, via internet o per telefono. Potrai anche aggiungere altri dettagli alla segnalazione e monitorarne lo stato. Ti invitiamo a ricontrollare dopo l'invio della segnalazione per vedere se ti sono state rivolte domande di approfondimento.

Come vengono gestiti i problemi

Indipendentemente dal modo scelto per procedere, la tua segnalazione sarà classificata in base alla priorità e sarà assegnata all'appropriato team addetto alle indagini per essere esaminata. Verrà effettuata una valutazione iniziale, per la quale ti potrebbe essere richiesto di fornire informazioni aggiuntive sul problema.

Riceverai notizie in merito a quanto emerso dalla valutazione iniziale e scoprirai se questo si tradurrà nell'apertura di un'indagine formale. In caso affermativo, e ove possibile, riceverai informazioni sul risultato dell'indagine (nel rispetto dei requisiti di privacy e riservatezza).

NIKE gestirà la tua segnalazione nel modo più efficiente possibile. Ogni caso è diverso e pertanto il periodo di tempo necessario per risolvere il problema può variare. NIKE si impegna a gestire tutte le segnalazioni in modo scrupoloso e in tempi ragionevoli. Per i problemi che rientrano in una delle categorie riportate nell'Appendice A, riceverai una conferma di ricezione entro sette giorni e informazioni sulle azioni successive entro tre mesi dalla presentazione.

Forma anonima

NIKE stipula un contratto con una società terza, NAVEX, per l'hosting del portale Speak Up, nonché per la ricezione e l'elaborazione delle segnalazioni.

Puoi segnalare il tuo problema in forma anonima sul portale Speak Up. Se scegli la forma anonima, NAVEX non cercherà di identificarti e garantirà il rispetto dell'anonimato.

Chi presenta una segnalazione in forma anonima può accedere agli aggiornamenti sullo stato e controllare se sono presenti eventuali domande di verifica effettuando il log in nel portale Speak Up con la chiave e la password. Se desideri ricevere notifiche, puoi fornire un indirizzo e-mail personale che **non** sarà incluso nella segnalazione a NIKE.

Tieni presente che le segnalazioni in forma anonima possono limitare la capacità di NIKE di procedere a indagini scrupolose dei tuoi problemi, anche se faremo comunque del nostro meglio.

Come vengono garantite la riservatezza e la protezione dei dati

I team responsabili della ricezione e della gestione delle segnalazioni procedono garantendo la massima riservatezza. Le segnalazioni vengono elaborate solo nei casi di effettiva necessità per proteggere l'identità di chi le presenta e delle eventuali terze parti coinvolte e per mantenere la riservatezza delle informazioni condivise nella segnalazione stessa.

L'analisi delle segnalazioni e le indagini sono effettuate nel rispetto dei requisiti legali in materia di privacy dei dati. Le informazioni in merito alla raccolta, al trattamento e alla conservazione dei dati personali sono disponibili nell'[Informativa sulla privacy](#) sul portale Speak Up.

Protezione dalle ritorsioni

NIKE non tollera ritorsioni contro chiunque segnali in buona fede un problema, presti aiuto a chi desidera procedere alla segnalazione o partecipi a indagini relative a una sospetta violazione, anche se alla fine le accuse non vengono convalidate.

Segnalazione esterna

Se il tuo problema riguarda le categorie elencate nell'Appendice A, puoi scegliere di presentare una segnalazione alla seguente autorità competente in Italia:

- [Autorità Nazionale Anticorruzione \(ANAC\)](#)

Tuttavia, raccomandiamo caldamente di segnalare gli eventuali casi di cattiva condotta innanzitutto direttamente a NIKE o alla persona designata a livello locale ricorrendo a uno dei canali indicati nella sezione "Come segnalare un problema". Si tratta del metodo più efficace per consentire a NIKE di effettuare indagini approfondite e occuparsi tempestivamente dei problemi segnalati.

Appendice A

Categorie dei problemi che rientrano nell'ambito di applicazione di questa procedura di reclamo:

- Appalti pubblici
- Servizi, prodotti e mercati finanziari
- Riciclaggio di denaro e finanziamento del terrorismo
- Sicurezza e conformità dei prodotti
- Sicurezza dei trasporti
- Tutela dell'ambiente
- Protezione dalle radiazioni e sicurezza nucleare
- Sicurezza di generi alimentari e mangimi
- Salute e benessere degli animali
- Sanità pubblica
- Tutela del consumatore
- Privacy e dati personali; sicurezza delle reti e dei sistemi informativi
- Interessi finanziari e mercato interno dell'Unione Europea, incluse legge sulla concorrenza e tassazione d'impresa
- Condotte illecite ai sensi del Decreto legislativo n. 231 dell'8 giugno 2001 o violazione dei relativi modelli organizzativi e gestionali
- Altri illeciti amministrativi, contabili, civili o penali che ledono l'interesse pubblico o l'integrità di NIKE

Spain Complaint Procedure

Introduction and Scope

At NIKE, Inc. we are committed to doing business with high ethical standards and carrying out our activities in a fair, responsible and sustainable way. We also expect our business partners to adhere to the same principles of legality and integrity to which NIKE holds itself.

We firmly believe that a culture of openness and honesty is an integral part of our company's long-term success. Reporting conduct that does not align with our values and possible breaches of applicable laws and regulations helps us protect NIKE, our employees, partners, investors and consumers, and the communities in which we operate. We treat reports seriously, fairly and promptly, and we take appropriate action to remedy and prevent violations where needed.

If this Procedure conflicts with locally applicable laws and regulations, local law shall prevail.

How to Raise a Concern

There are multiple ways to report a concern.

You may choose to:

- Use the [Speak Up Portal](#). If your concern falls under one of the categories listed in Appendix A, you may choose to have your report routed to a local channel (refer to the "What You Can Report" section below).
- Contact [People Solutions](#) through the NIKE HR website.
- Contact your NIKE manager or any NIKE leader.

You can access the [Speak Up Portal](#) and visit [Zero](#) to find related resources, including information on the various Speak Up channels. NIKE also provides a link to the Speak Up Portal on its [investors website](#). You can report a concern online, or if you prefer to report a concern by phone, the Speak Up Portal will provide you with a toll-free telephone number for the country from which you are contacting us.

Who Can Report a Concern

Anyone who acquired information on a relevant wrongdoing in a work-related/professional context can use NIKE's Speak Up Portal to ask a question or report a concern, including:

- Employees, former employees and candidates whose employment has not started
- Self-employed professionals or freelancers
- Shareholders and persons belonging to the administrative, management or supervisory body, including non-executive members
- Service providers, contractors, subcontractors and suppliers, as well as any persons acting under their supervision and direction
- Volunteers or unpaid workers or trainees.

What You Can Report

You can report any actual or suspected misconduct or concerns relating to NIKE's Code of Ethics, including but not limited to discrimination, retaliation and harassment in the workplace; unethical business conduct; accounting and financial reporting violations; theft, fraud and discount abuse; health, safety and security concerns; misuse or misappropriation of information; product and process concerns; human rights violations and environmental breaches.

However, the Speak Up process and related Complaint Procedure are not intended for questions or complaints about products, orders or customer service-based encounters. These concerns should be addressed to NIKE's [customer service channels](#).

If you are located in Spain, you may have the option to report locally if your concern falls under one of the categories listed in Appendix A of this Procedure. Choosing to report locally means that your report will be directed to the Local Designated Person, who will be your point of contact throughout the Speak Up process. In Spain, People Solutions will act as the Local Designated Person. This role may be delegated to other appropriate functions or third parties as needed.

We encourage you to keep using the global channel. However, whether you choose to report locally or globally, your concern will be directed to the appropriate channel.

What Happens After Reporting a Concern Using the Speak Up Portal

When you report your concern either online or by telephone, you will be given a unique report key, and you will be asked to create a password. The report key and password will allow you to access your original report, by internet or telephone. You will also be able to add additional details to your report, and monitor its status. You are encouraged to check back after your report has been submitted to see if any follow-up questions have been posed to you.

How Concerns Are Handled

Regardless of how you choose to raise a concern, your report will be triaged and assigned to the relevant investigations team for review. An initial assessment will be carried out, for which you may be asked to provide additional information about your concern.

You will be informed of the outcome of the initial assessment, and whether it leads to the opening of a formal investigation. If so, and where possible, you will be informed of the outcome of the investigation (subject to privacy and confidentiality requirements).

NIKE will handle your report as efficiently as possible. Each case is different and thus the length of time needed to resolve your concern may vary. NIKE strives to handle all reports thoroughly based on a reasonable timeframe. For concerns that fall within one of the categories listed in Appendix A, you will receive an acknowledgement of receipt within seven days and information on follow-up action within three months of filing. If the nature of the investigation requires a longer timeframe for completion, you will be informed of the delay (which should not exceed three additional months).

Remaining Anonymous

NIKE contracts with a third-party company, NAVEX, to host the Speak Up Portal, and to receive and process reports.

You may report your concern anonymously on the Speak Up Portal. If you choose to remain anonymous, NAVEX will not pursue your identity and will ensure anonymity is maintained.

Anonymous reporters can access status updates or check for follow-up questions, if any, by logging into the Speak Up Portal with their report key and password. If you would like to receive notifications, you may provide a personal email address that will **not** be included with your report to NIKE.

Please know that reporting anonymously may limit NIKE's ability to thoroughly investigate your concerns, though we will do so to the best of our ability.

How Confidentiality and Data Protection Are Ensured

The teams responsible for receiving and handling reports treat them in strict confidence. Reports are processed on a need-to-know basis to protect the identity of the reporter and any third parties mentioned, and to maintain the confidentiality of information shared in the report.

The review and investigation of reports are carried out in accordance with data privacy legal requirements. Information concerning the collection, processing and retention of personal data can be found in the [Privacy Policy](#) on the Speak Up Portal.

Protection From Retaliation

NIKE does not tolerate retaliation against any individual who reports in good faith a concern, who assists a reporter in raising a concern, or who participates in any investigation of a suspected violation, even if the allegation is ultimately not substantiated.

Making a Report Externally

If your concern relates to the categories listed in Appendix A, you may choose to submit a report to the following competent authorities in Spain and expect protection as with an internal report:

- General Autoridad Independiente de Protección del Informante (AAI)
- [Andalusian Anti-Fraud Office](#)
- [Anti-Fraud Office of Catalonia](#)
- Galician Authority for the Protection of Informant Persons
- [Prevention and Anti-Corruption Office](#)
- [Office of Good Practices and Anti-Corruption](#)
- [Agency for the Prevention and Fight Against Fraud and Corruption](#)

However, it is strongly recommended to first report possible misconduct to NIKE or the Local Designated Person directly, using any of the channels highlighted in the “How to Raise a Concern” section. This remains the most efficient way to allow NIKE to thoroughly investigate and promptly address reported issues.

Appendix A

Categories of Concerns within the scope of this Complaint Procedure:

- Public procurement
- Financial services, products and markets
- Money laundering and terrorist financing
- Product safety and compliance
- Transport safety
- Protection of the environment
- Radiation protection and nuclear safety
- Food and feed safety
- Animal health and welfare
- Public health
- Consumer protection
- Protection of privacy and personal data, and security of network and information systems
- Occupational health and safety violations
- Financial interests and internal market of the European Union, including competition law and corporate taxation
- Acts or omissions that could constitute a serious criminal or administrative offence, including those entailing a financial loss for Spanish tax and social security authorities

Procedimiento de reclamación para España

Introducción y alcance

En NIKE, Inc. nos comprometemos a trabajar con unos estándares éticos altos y a llevar a cabo nuestras actividades de una manera justa, responsable y sostenible. Además, esperamos que nuestros partners comerciales cumplan los mismos principios de legalidad e integridad por los que se rige Nike.

Creemos firmemente que la transparencia y la honestidad son una parte fundamental del éxito a largo plazo de nuestra empresa. Denunciar conductas que no están en línea con nuestros valores y posibles incumplimientos de las leyes y normativas aplicables nos ayuda a proteger a Nike, a nuestra plantilla, a partners, a inversores, a consumidores y a las comunidades con quienes trabajamos. Tratamos las denuncias con total seriedad e imparcialidad y de forma inmediata. Además, tomamos las medidas adecuadas para remediar y prevenir las infracciones cuando sea necesario.

Si este procedimiento contradice las leyes y normativas locales aplicables, prevalecerá la legislación local.

Cómo presentar una denuncia

Hay muchas formas de presentar una denuncia.

Puedes:

- Utilizar el [portal Speak Up](#). Si el motivo de tu denuncia aparece en una de las categorías del Apéndice A, puedes redirigirla a un canal local (consulta la sección "Qué puedes denunciar" a continuación).
- Contactar con [People Solutions](#) mediante el sitio web de NIKE HR.
- Contactar con tu manager de Nike o con cualquier leader de Nike.

Para encontrar recursos relacionados, como información sobre los distintos canales de Speak Up, puedes entrar en [Zero](#) y acceder al [portal Speak Up](#). Nike también ofrece un enlace al portal Speak Up en su [sitio web para inversores](#). Puedes presentar una denuncia online, pero, si prefieres llamarnos, el portal Speak Up te ofrece un número de teléfono gratuito de tu país/región para ponerte en contacto con nuestro equipo.

Quién puede presentar una denuncia

Cualquier persona que haya obtenido información sobre alguna infracción relevante en un contexto profesional o laboral puede utilizar el portal Speak Up de Nike para consultar dudas o informar de un problema. Por ejemplo:

- personal, antiguo personal y solicitantes de empleo que no hayan empezado a trabajar
- profesionales por cuenta propia
- accionistas y personas pertenecientes al órgano de administración, dirección o supervisión, incluidos miembros no ejecutivos
- proveedores de servicios, contratistas, subcontratistas y proveedores, así como cualquier persona bajo la supervisión y dirección de estos
- personas voluntarias o personal no remunerado o en formación

Qué puedes denunciar

Puedes informar sobre presuntas infracciones, infracciones reales o conductas indebidas relacionadas con el Código ético de Nike. Esto incluye, entre otros, discriminación, represalias y acoso en el lugar de trabajo; conductas empresariales indebidas; infracciones en informes financieros y de contabilidad; robo, fraude y abusos de descuentos; problemas relacionados con la salud, la seguridad y la protección; uso indebido o apropiación indebida de información; problemas sobre productos y procesos; violaciones de los derechos humanos e infracciones medioambientales.

Sin embargo, el proceso de Speak Up y el procedimiento de reclamaciones correspondiente no están pensados para enviar preguntas o quejas sobre productos, pedidos o experiencias con el servicio de atención al cliente. Estos problemas deben dirigirse a los [canales del servicio de atención al cliente](#) de Nike.

Si estás en España, es posible que puedas denunciar a nivel local si el motivo de la denuncia pertenece a una de las categorías que aparecen en el Apéndice A de este procedimiento. Si decides informar de un asunto a nivel local, tu denuncia se dirigirá a una persona designada de tu zona, que será tu punto de contacto durante todo el proceso de Speak Up. En España, People Solutions actuará como persona designada de tu zona. Este puesto puede delegarse a otras funciones que se consideren adecuadas o a terceros según sea necesario.

Te animamos a usar el canal global, pero ten en cuenta que tu denuncia se redirigirá al canal adecuado tanto si decides emitirla a nivel local como si prefieres la vía global.

¿Qué ocurre después de informar de un problema a través del portal Speak Up?

Cuando informes de algún problema, ya sea online o por teléfono, se te proporcionará una clave de denuncia única y se te pedirá que crees una contraseña. Estas credenciales te permitirán acceder a tu denuncia original, tanto por Internet como por teléfono. También podrás añadir detalles adicionales a tu denuncia y hacer un seguimiento de su estado. Te recomendamos que vuelvas a comprobar tu denuncia tras enviarla para ver si se te ha planteado alguna pregunta de seguimiento.

Cómo se gestionan las denuncias

Independientemente de cómo decidas informar de la situación, tu denuncia se clasificará y se asignará al equipo de investigación correspondiente para su revisión. A continuación, se llevará a cabo una evaluación inicial, para la cual es posible que se te pida que proporciones más información sobre tu denuncia.

Se te informará del resultado de la evaluación inicial y de si se decide abrir una investigación formal. Si es así, y siempre que sea posible, se te informará del resultado de la investigación (conforme a los requisitos de privacidad y confidencialidad).

Nike gestionará tu denuncia de la forma más eficiente posible. Ten en cuenta que cada caso es diferente y, por tanto, el tiempo necesario para resolver un problema no es siempre el mismo. Nike se esfuerza por gestionar todas las denuncias minuciosamente y en un periodo de tiempo razonable. Si el motivo de tu denuncia pertenece a una de las categorías del Apéndice A, recibirás un acuse de recibo en un plazo de

7 días e información sobre las medidas de seguimiento en un plazo de 3 meses desde la notificación del problema. Si la naturaleza de la investigación requiere más tiempo para completarse correctamente, se te informará del retraso (que no debería ser superior a 3 meses).

Anonimato asegurado

Nike contrata a una empresa externa llamada NAVEX tanto para poder utilizar el portal Speak Up como para recibir y procesar denuncias.

El portal Speak Up te permite presentar denuncias de forma anónima. Si decides hacerlo así, NAVEX no investigará tu identidad y se asegurará de mantener tu anonimato.

Las personas que informen de alguna infracción de manera anónima pueden comprobar el estado de su denuncia o ver si se han añadido preguntas de seguimiento iniciando sesión en el portal Speak Up con la clave y la contraseña asociadas. Si quieres recibir notificaciones, deberás proporcionar una dirección de correo electrónico personal, que **no** se incluirá en la denuncia que se envíe a Nike.

Ten en cuenta que presentar la denuncia de forma anónima puede limitar la capacidad de Nike de investigar a fondo el problema que nos has notificado, aunque haremos todo lo que podamos.

Cómo se garantiza la confidencialidad y la protección de datos

Los equipos responsables de recibir y gestionar las denuncias las tratan con estricta confidencialidad. Las denuncias se procesan según sea necesario para proteger la identidad de las personas que las presentan y de las terceras partes mencionadas, y para mantener la confidencialidad de la información contenida en la denuncia.

La revisión e investigación de las denuncias se llevan a cabo de acuerdo con los requisitos legales de privacidad de datos. Puedes encontrar información relativa a la recopilación, el procesamiento y la conservación de datos personales en la [Política de privacidad](#) del Portal Speak Up.

Protección contra represalias

Nike no consiente represalias contra ninguna persona que presente de buena fe una denuncia, que ayude a alguien a presentar una denuncia o que participe en cualquier investigación de una presunta infracción, incluso si la acusación finalmente no está fundamentada.

Presentar una denuncia a nivel externo

Si el asunto sobre el que quieres avisar está relacionado con las categorías del Apéndice A, puedes presentar una denuncia a las siguientes autoridades españolas competentes y recibir la misma protección que hubieras tenido presentándola a nivel interno.

- Autoridad Independiente de Protección del Informante (AAI)
- [Oficina Andaluza Antifraude](#)
- [Oficina Antifraude de Cataluña](#)
- Autoridad Gallega de Protección a la Persona Informante

- [Oficina de Prevención y Lucha contra la Corrupción de las Islas Baleares \(oficina extinguida\)](#)
- [Oficina de Buenas Prácticas y Anticorrupción de Navarra](#)
- [Agencia de Prevención y Lucha contra el Fraude y la Corrupción de la Comunidad Valenciana](#)

Sin embargo, primero se recomienda informar de cualquier posible conducta inapropiada directamente a Nike o a la persona designada de tu zona mediante alguno de los canales indicados en la sección "Cómo informar de un problema". Esta sigue siendo la forma más eficaz de que NIKE[[]] investigue a fondo los problemas notificados y los pueda gestionar a la mayor brevedad posible.

Apéndice A

Categorías de infracciones que engloba este procedimiento:

- Contratación pública
- Productos, mercados y servicios financieros
- Blanqueo de capitales y financiación del terrorismo
- Seguridad y cumplimiento de los productos
- Seguridad en el transporte
- Protección del medioambiente
- Protección radiológica y seguridad nuclear
- Seguridad de alimentos y piensos
- Salud y bienestar animal
- Salud pública
- Protección del consumidor
- Protección de la privacidad y los datos personales; seguridad de las redes y de los sistemas de información
- Infracciones de la seguridad y la salud laborales
- Intereses financieros y mercado interior de la Unión Europea, incluido el derecho de la competencia y la fiscalidad de las sociedades
- Actos u omisiones que puedan constituir una infracción penal o administrativa grave, incluidos los que suponen una pérdida económica para las autoridades fiscales y de seguridad social de España

Germany Complaint Procedure

Introduction and Scope

At NIKE, Inc. we are committed to doing business with high ethical standards and carrying out our activities in a fair, responsible and sustainable way. We also expect our business partners to adhere to the same principles of legality and integrity to which NIKE holds itself.

We firmly believe that a culture of openness and honesty is an integral part of our company's long-term success. Reporting conduct that does not align with our values and possible breaches of applicable laws and regulations helps us protect NIKE, our employees, partners, investors and consumers, and the communities in which we operate. We treat reports seriously, fairly and promptly, and we take appropriate action to remedy and prevent violations where needed.

If this Procedure conflicts with locally applicable laws and regulations, local law shall prevail.

How to Raise a Concern

There are multiple ways to report a concern.

You may choose to:

- Use the [Speak Up Portal](#). If your concern falls under one of the categories listed in Appendix A, you may choose to have your report routed to a local channel (refer to the "What You Can Report" section below).
- Contact [People Solutions](#) through the NIKE HR website.
- Contact your NIKE manager or any NIKE leader.

You can access the [Speak Up Portal](#) and visit [Zero](#) to find related resources, including information on the various Speak Up channels. NIKE also provides a link to the Speak Up Portal on its [investors website](#). You can report a concern online, or if you prefer to report a concern by phone, the Speak Up Portal will provide you with a toll-free telephone number for the country from which you are contacting us.

Who Can Report a Concern

Anyone who acquired information on a relevant wrongdoing in a work-related or professional context can use NIKE's Speak Up Portal to ask a question or report a concern, including:

- Employees, former employees and candidates whose employment has not started
- Self-employed professionals or freelancers
- Shareholders and persons belonging to the administrative, management or supervisory body, including non-executive members
- Service providers, contractors, subcontractors and suppliers, as well as any persons acting under their supervision and direction
- Volunteers or unpaid workers or trainees.

What You Can Report

You can report any actual or suspected misconduct or concerns relating to NIKE's Code of Ethics, including but not limited to discrimination, retaliation and harassment in the workplace; unethical business conduct; accounting and financial reporting violations; theft, fraud and discount abuse; health, safety and security concerns; misuse or misappropriation of information; product and process concerns; human rights violations and environmental breaches.

However, the Speak Up process and related Complaint Procedure are not intended for questions or complaints about products, orders or customer service-based encounters. These concerns should be addressed to NIKE's [customer service channels](#).

If you are located in Germany, you may have the option to report locally if your concern falls under one of the categories listed in Appendix A of this Procedure. Choosing to report locally means that your report will be directed to the Local Designated Person, who will be your point of contact throughout the Speak Up process. In Germany, People Solutions will act as the Local Designated Person. This role may be delegated to other appropriate functions or third parties as needed.

We encourage you to keep using the global channel. However, whether you choose to report locally or globally, your concern will be directed to the appropriate channel.

What Happens After Reporting a Concern Using the Speak Up Portal

When you report your concern either online or by telephone, you will be given a unique report key, and you will be asked to create a password. The report key and password will allow you to access your original report, by internet or telephone. You will also be able to add additional details to your report, and monitor its status. You are encouraged to check back after your report has been submitted to see if any follow-up questions have been posed to you.

How Concerns Are Handled

Regardless of how you choose to raise a concern, your report will be triaged and assigned to the relevant investigations team for review. An initial assessment will be carried out, for which you may be asked to provide additional information about your concern.

You will be informed of the outcome of the initial assessment, and whether it leads to the opening of a formal investigation. If so, and where possible, you will be informed of the outcome of the investigation (subject to privacy and confidentiality requirements).

NIKE will handle your report as efficiently as possible. Each case is different and thus the length of time needed to resolve your concern may vary. NIKE strives to handle all reports thoroughly based on a reasonable timeframe. For concerns that fall within one of the categories listed in Appendix A, you will receive an acknowledgement of receipt within seven days and information on follow-up action within three months of filing.

Remaining Anonymous

NIKE contracts with a third-party company, NAVEX, to host the Speak Up Portal, and to receive and process reports.

You may report your concern anonymously on the Speak Up Portal. If you choose to remain anonymous, NAVEX will not pursue your identity and will ensure anonymity is maintained.

Anonymous reporters can access status updates or check for follow-up questions, if any, by logging into the Speak Up Portal with their report key and password. If you would like to receive notifications, you may provide a personal email address that will **not** be included with your report to NIKE.

Please know that reporting anonymously may limit NIKE's ability to thoroughly investigate your concerns, though we will do so to the best of our ability.

How Confidentiality and Data Protection Are Ensured

The teams responsible for receiving and handling reports treat them in strict confidence. Reports are processed on a need-to-know basis to protect the identity of the reporter and any third parties mentioned, and to maintain the confidentiality of information shared in the report.

The review and investigation of reports are carried out in accordance with data privacy legal requirements. Information concerning the collection, processing and retention of personal data can be found in the [Privacy Policy](#) on the Speak Up Portal.

Protection From Retaliation

NIKE does not tolerate retaliation against any individual who reports in good faith a concern, who assists a reporter in raising a concern, or who participates in any investigation of a suspected violation, even if the allegation is ultimately not substantiated.

Making a Report Externally

If your concern relates to the categories listed in Appendix A, you may choose to submit a report to the following competent authorities in Germany:

- [Bundeskartellamt](#)
- [Federal Office of Justice](#)
- [Central Audit Office for Combating Corruption in Berlin \(Zentrale Revision zur Korruptionsbekämpfung \(ZRK\)\)](#)

However, it is strongly recommended to first report possible misconduct to NIKE or the Local Designated Person directly, using any of the channels highlighted in the “How to Raise a Concern” section. This remains the most efficient way to allow NIKE to thoroughly investigate and promptly address reported issues.

Appendix A

Categories of Concerns within the scope of this Complaint Procedure:

- Violations punishable by law
- Violations subject to a fine if the violated regulation serves to protect life, limb or health, or to protect the rights of employees or their representative bodies
- Money laundering, terrorist financing
- Product safety and compliance
- Transport safety
- Protection of environment
- Radiation protection and nuclear safety
- Food and feed safety
- Animal health and welfare
- Public health
- Consumer protection
- Privacy and personal data; security of network and information systems
- Financial services, products and markets
- Public procurement
- Financial interests and internal market of the European Union, including competition law and corporate taxation

Beschwerdeverfahren - Deutschland

Einführung und Geltungsbereich

Wir bei NIKE, Inc. haben uns dazu verpflichtet, unsere Geschäfte nach hohen ethischen Standards zu führen und unsere Geschäftspraktiken auf faire, verantwortungsvolle und nachhaltige Weise umzusetzen. Wir erwarten auch von unseren Geschäftspartnern, dass sie sich an dieselben Grundsätze der Rechtmäßigkeit und Integrität halten, denen sich NIKE verpflichtet fühlt.

Wir sind der festen Überzeugung, dass eine Kultur der Offenheit und Ehrlichkeit für den langfristigen Erfolg unseres Unternehmens unerlässlich ist. Das Melden von Verhaltensweisen, die nicht mit unseren Werten übereinstimmen, und von möglichen Verstößen gegen geltende Gesetze und Vorschriften unterstützt uns dabei, NIKE, unsere Mitarbeiter:innen, Partner, Investor:innen und Kund:innen sowie die Communitys, in denen wir tätig sind, zu schützen. Wir behandeln alle Meldungen ernsthaft, fair und zeitnah und ergreifen bei Bedarf geeignete Maßnahmen, um Regelverstöße zu korrigieren und zu vermeiden.

Sollte dieses Verfahren im Widerspruch zu lokalen Gesetzen und Vorschriften stehen, hat das lokale Recht Vorrang.

Wie melde ich ein Anliegen?

Dir stehen mehrere Wege offen, ein Anliegen zu melden.

Wähle entsprechend deiner Situation:

- Nutze das [Speak Up Portal](#). Wenn dein Anliegen unter eine der in Anhang A aufgeführten Kategorien fällt, kannst du deine Meldung an einen lokalen Kanal weiterleiten (siehe Abschnitt "Was kannst du melden?" weiter unten).
- Wende dich über die NIKE HR-Website an [People Solutions](#).
- Wende dich an deine:n Nike Manager:in oder eine:n andere:n NIKE Leader:in.

Im [Speak Up Portal](#) und auf [Zero](#) findest du weitere Ressourcen, einschließlich Informationen zu den verschiedenen Speak Up-Kanälen. Auf der NIKE [Website für Investor:innen](#) findest du ebenfalls einen Link zum Speak Up Portal. Neben den Online-Kanälen kannst du deine Bedenken auch telefonisch melden, wenn du dies bevorzugst. Im Speak Up Portal findest du eine gebührenfreie Telefonnummer für das Land, aus dem du uns erreichen möchtest.

Wer kann ein Anliegen melden?

Jede Person, die in ihrem Arbeits- oder Geschäftsumfeld Kenntnis von einem konkreten Fehlverhalten erlangt, kann das Speak Up Portal von NIKE nutzen, um eine Frage zu stellen oder ein Anliegen zu melden, u. a.:

- Mitarbeiter:innen, ehemalige Mitarbeiter:innen und Kandidat:innen, deren Arbeitsverhältnis noch nicht begonnen hat
- Selbstständige oder Freiberufler:innen

- Aktionär:innen sowie Mitglieder der Verwaltungs-, Management- oder Aufsichtsorgane, einschließlich nicht geschäftsführender Mitglieder
- Dienstleistungserbringende, auftragnehmende Parteien, Subunternehmen und Lieferfirmen sowie alle unter deren Aufsicht und Weisung handelnden Personen
- Freiwillige, unbezahlte Arbeiter:innen oder Trainees.

Was kannst du melden?

Du kannst jegliches tatsächliche oder vermutete Fehlverhalten oder Anliegen bezüglich des Verhaltenskodex von NIKE melden. Darunter fallen unter anderem Diskriminierung, Vergeltungsmaßnahmen und Belästigung am Arbeitsplatz, unethisches Geschäftsgebaren, Verstöße gegen die Buchhaltung und Finanzberichte, Diebstahl, Betrug und Rabattmissbrauch, Gesundheits-, Sicherheits- und Schutzbedenken, Missbrauch oder Veruntreuung von Informationen, Bedenken bezüglich Produkte und Verfahrensweisen, Menschenrechtsverletzungen und Verstöße gegen Umweltauflagen.

Die Speak Up-Plattform und das damit verbundene Beschwerdeverfahren sind jedoch nicht für Fragen oder Beschwerden zu Produkten, Bestellungen oder Interaktionen mit dem Customer Service gedacht. Anliegen dieser Art sollten über die [Customer Service-Kanäle](#) von NIKE eingereicht werden.

Wenn du an einem Standort in Deutschland arbeitest, hast du die Möglichkeit, dein Anliegen lokal zu melden, sofern es in eine der in Anhang A dieses Dokuments aufgeführten Kategorien fällt. Wenn du dich für eine lokale Meldung entscheidest, wird dein Anliegen an die zuständige Person vor Ort weitergeleitet, die während des gesamten Speak Up-Verfahrens dein:e Ansprechpartner:in bleibt. In Deutschland übernimmt People Solutions die Rolle der lokalen Ansprechperson. Diese Rolle kann bei Bedarf an andere zuständige Stellen oder Dritte delegiert werden.

Wir empfehlen dir, weiterhin den standortunabhängigen Kanal zu verwenden. Ungeachtet dessen, ob du dich für eine lokale oder standortunabhängige Meldung entscheidest, wird dein Anliegen an den entsprechenden Kanal weitergeleitet.

Wie geht es weiter, nachdem ich mein Anliegen im Speak Up Portal gemeldet habe?

Wenn du deine Meldung online oder telefonisch abgibst, erhältst du einen persönlichen Vorgangscodex und wirst aufgefordert, ein Kennwort zu vergeben. Mit dem Vorgangscodex und dem Kennwort kannst du über das Internet oder per Telefon auf deine ursprüngliche Meldung zugreifen. Außerdem kannst du deiner Meldung weitere Details hinzufügen und ihren Status verfolgen. Wir empfehlen dir, nach dem Absenden deiner Meldung zu überprüfen, ob es Rückfragen an dich gibt.

Wie werden Anliegen behandelt?

Unabhängig davon, wie du ein Anliegen vorbringst, wird deine Meldung vorsortiert und an das zuständige Untersuchungsteam zur Überprüfung weitergeleitet. Daraufhin wird eine erste Bewertung durchgeführt, gegebenenfalls wirst du gebeten, ergänzende Informationen zu deinem Anliegen nachzureichen.

Du wirst über das Ergebnis der ersten Beurteilung informiert und darüber, ob eine offizielle Untersuchung eingeleitet wird. In diesem Fall wirst du, soweit möglich, über das Ergebnis der Untersuchung in Kenntnis gesetzt (unter Berücksichtigung der Anforderungen an Datenschutz und Vertraulichkeit).

NIKE wird deine Meldung so schnell wie möglich bearbeiten. Da jeder Fall anders gelagert ist, kann die Bearbeitungszeit variieren. NIKE ist bestrebt, alle Berichte gründlich und innerhalb eines angemessenen Zeitrahmens zu bearbeiten. Bei Anliegen, die in eine der in Anhang A aufgeführten Kategorien fallen, erhältst du innerhalb von sieben Tagen eine Eingangsbestätigung und innerhalb von drei Monaten nach Einreichung Informationen über das weitere Vorgehen.

Du möchtest anonym bleiben?

Die Firma NAVEX wurde von NIKE mit dem Hosting des Speak Up Portals beauftragt und ist für den Empfang und die Bearbeitung der Meldungen zuständig.

Im Speak Up Portal kannst du deine Anliegen anonym melden. Wenn du anonym bleiben möchtest, verzichtet NAVEX darauf, deine Identität festzustellen und stellt sicher, dass deine Anonymität gewahrt bleibt.

Auch anonyme Hinweisgeber:innen können den Status ihrer Meldung überprüfen oder nachsehen, ob es Folgefragen gibt, indem sie sich mit ihrem Vorgangscodex und ihrem Kennwort im Speak Up Portal anmelden. Um Benachrichtigungen zu erhalten, kannst du eine persönliche E-Mail-Adresse angeben, die **nicht** mit der Meldung an NIKE übermittelt wird.

Beachte bitte, dass anonyme Meldungen die Möglichkeiten von NIKE einschränken können, Anliegen vollständig zu untersuchen. Wir bemühen uns selbstverständlich, auch in solchen Fällen eine umfassende Prüfung durchzuführen.

Wie gewährleisten wir Vertraulichkeit und Datenschutz?

Die Teams, die für den Empfang und die Bearbeitung von Meldungen zuständig sind, behandeln diese streng vertraulich. Die Meldungen werden nur von Personen bearbeitet, die davon Kenntnis haben müssen, damit die Identität der meldenden Person und der in der Meldung erwähnten Dritten geschützt wird und die Vertraulichkeit der in der Meldung enthaltenen Informationen gewahrt bleibt.

Die Prüfung und Untersuchung der Meldungen erfolgen unter Beachtung der datenschutzrechtlichen Bestimmungen. Informationen zur Erhebung, Verarbeitung und Speicherung personenbezogener Daten findest du in der [Datenschutzrichtlinie](#) im Speak Up Portal.

Schutz vor Vergeltungsmaßnahmen

NIKE duldet keine Vergeltungsmaßnahmen gegen Personen, die in gutem Glauben ein Anliegen melden, die eine Person bei der Meldung eines Anliegens unterstützen oder die an einer Untersuchung eines mutmaßlichen Verstoßes beteiligt sind, selbst wenn sich die Anschuldigung letztendlich als unbegründet erweist.

Ein Anliegen extern melden

Wenn sich dein Anliegen auf eine der in Anhang A aufgeführten Kategorien bezieht, hast du die Möglichkeit, dich an die folgenden zuständigen Behörden in Deutschland zu wenden:

- [Bundeskartellamt](#)
- [Bundesamt für Justiz](#)
- [Zentrale Revision zur Korruptionsbekämpfung \(ZRK\) in Berlin](#)

Es wird jedoch dringend empfohlen, ein etwaiges Fehlverhalten zunächst direkt NIKE oder der zuständigen Person vor Ort zu melden, und zwar über einen der im Abschnitt "Wie melde ich ein Anliegen?" genannten Kanäle. Dies ist nach wie vor der effizienteste Weg für NIKE, gemeldete Probleme gründlich zu untersuchen und umgehend zu lösen.

Anhang A

Kategorien von Anliegen im Geltungsbereich dieses Beschwerdeverfahrens:

- Strafbare Handlungen
- Verstöße mit Geldstrafen, insofern die verletzte Vorschrift dem Schutz des Lebens, der körperlichen Unversehrtheit oder der Gesundheit oder dem Schutz der Mitarbeiterrechte oder der sie vertretenden Organe dient
- Geldwäsche, Terrorismusfinanzierung
- Produktsicherheit und -Compliance
- Transportsicherheit
- Umweltschutz
- Strahlenschutz und nukleare Sicherheit
- Lebens- und Futtermittelsicherheit
- Tiergesundheit und Tierschutz
- Gesundheitswesen
- Verbraucherschutz
- Datenschutz und personenbezogene Daten; Sicherheit von Netzwerken und Informationssystemen
- Finanzdienstleistungen, Produkte und Märkte
- Öffentliches Procurement
- Finanzielle Interessen und Binnenmarkt der Europäischen Union, einschließlich Wettbewerbsrecht und Unternehmensbesteuerung

Poland Complaint Procedure

Introduction and Scope

At NIKE, Inc. we are committed to doing business with high ethical standards and carrying out our activities in a fair, responsible and sustainable way. We also expect our business partners to adhere to the same principles of legality and integrity to which NIKE holds itself.

We firmly believe that a culture of openness and honesty is an integral part of our company's long-term success. Reporting conduct that does not align with our values and possible breaches of applicable laws and regulations helps us protect NIKE, our employees, partners, investors and consumers, and the communities in which we operate. We treat reports seriously, fairly and promptly, and we take appropriate action to remedy and prevent violations where needed.

If this Procedure conflicts with locally applicable laws and regulations, local law shall prevail.

How to Raise a Concern

There are multiple ways to report a concern.

You may choose to:

- Use the [Speak Up Portal](#). If your concern falls under one of the categories listed in Appendix A, you may choose to have your report routed to a local channel (see the "What You Can Report" section below).
- Contact [People Solutions](#) through the NIKE HR website.
- Contact your NIKE manager or any NIKE leader.

You can access the [Speak Up Portal](#) and visit [Zero](#) to find related resources, including information on the various Speak Up channels. NIKE also provides a link to the Speak Up Portal on its [investors website](#). You can report a concern online, or if you prefer to report a concern by phone, the Speak Up Portal will provide you with a toll-free telephone number for the country from which you are contacting us.

Who Can Report a Concern

Anyone who acquired information on a relevant wrongdoing in a work-related/professional context can use NIKE's Speak Up Portal to ask a question or report a concern, including:

- Employees, former employees and candidates whose employment has not started
- Self-employed professionals, freelancers, proxies or commercial representatives
- Shareholders and persons belonging to the administrative, management or supervisory body, including non-executive members
- Service providers, contractors, subcontractors and suppliers, as well as any persons acting under their supervision and direction
- Volunteers or unpaid workers or trainees.

What You Can Report

You can report any actual or suspected misconduct or concerns relating to NIKE's Code of Ethics, including but not limited to discrimination, retaliation and harassment in the workplace; unethical business conduct; accounting and financial reporting violations; theft, fraud and discount abuse; health, safety and security concerns; misuse or misappropriation of information; product and process concerns; human rights violations and environmental breaches.

However, the Speak Up process and related Complaint Procedure are not intended for questions or complaints about products, orders, or customer service-based encounters. These concerns should be addressed to NIKE's [customer service channels](#).

If you are located in Poland, you may have the option to report locally if your concern falls under one of the categories listed in Appendix A of this procedure. Choosing to report locally means that your report will be directed to the Local Designated Person, who will be your point of contact throughout the Speak Up process. In Poland, People Solutions will act as the Local Designated Person. This role may be delegated to other appropriate functions or third parties as needed.

We encourage you to keep using the global channel. However, whether you choose to report locally or globally, your concern will be directed to the appropriate channel.

What Happens After Reporting a Concern Using the Speak Up Portal

When you report your concern either online or by telephone, you will be given a unique report key, and you will be asked to create a password. The report key and password will allow you to access your original report, by internet or telephone. You will also be able to add additional details to your report, and monitor its status. You are encouraged to check back after your report has been submitted to see if any follow-up questions have been posed to you.

How Concerns Are Handled

Regardless of how you choose to raise a concern, your report will be triaged and assigned to the relevant investigations team for review. An initial assessment will be carried out, for which you may be asked to provide additional information about your concern.

You will be informed of the outcome of the initial assessment, and whether it leads to the opening of a formal investigation. If so, and where possible, you will be informed of the outcome of the investigation (subject to privacy and confidentiality requirements).

NIKE will handle your report as efficiently as possible. Each case is different and thus the length of time needed to resolve your concern may vary. NIKE strives to handle all reports thoroughly based on a reasonable timeframe. For concerns that fall within one of the categories listed in Appendix A, you will receive an acknowledgement of receipt within seven days and information on follow-up action within three months of filing.

Remaining Anonymous

NIKE contracts with a third-party company, NAVEX, to host the Speak Up Portal, and to receive and process reports.

You may report your concern anonymously in the Speak Up Portal. If you choose to remain anonymous, NAVEX will not pursue your identity and will ensure anonymity is maintained.

Anonymous reporters can access status updates or check for follow-up questions, if any, by logging into the Speak Up Portal with their report key and password. If you would like to receive notifications, you may provide a personal email address that will **not** be included with your report to NIKE.

Please know that reporting anonymously may limit NIKE's ability to thoroughly investigate your concerns, though we will do so to the best of our ability.

How Confidentiality and Data Protection Are Ensured

The teams responsible for receiving and handling reports treat them in strict confidence. Reports are processed on a need-to-know basis to protect the identity of the reporter and any third parties mentioned, and to maintain the confidentiality of information shared in the report.

The review and investigation of reports are carried out in accordance with data privacy legal requirements. Information concerning the collection, processing and retention of personal data can be found in the [Privacy Policy](#) on the Speak Up Portal.

Protection From Retaliation

NIKE does not tolerate retaliation against any individual who reports in good faith a concern, who assists a reporter in raising a concern, or who participates in any investigation of a suspected violation, even if the allegation is ultimately not substantiated.

Making a Report Externally

If your concern relates to the categories listed in Appendix A, you may choose to submit a report to the following competent authorities in Poland:

- [Commissioner for Human Rights](#)
- Competent public authorities for areas listed in art.3.1. of the Act of 14 June 2024 on the protection of whistleblowers

However, it is strongly recommended to first report possible misconduct to NIKE or the Local Designated Person directly, using any of the channels highlighted in the "How to Raise a Concern?" section. This remains the most efficient way to allow NIKE to thoroughly investigate and promptly address reported issues.

Appendix A

Categories of Concerns within the scope of this Complaint Procedure:

- Corruption
- Public procurement
- Financial services, products and markets
- Money laundering and terrorist financing
- Product safety and compliance
- Transport safety
- Protection of the environment
- Radiation protection and nuclear safety
- Food and feed safety
- Animal health and welfare
- Public health
- Consumer protection
- Protection of privacy and personal data
- Security of network and information systems
- Financial interests of Poland and the European Union
- Internal market of the European Union, including competition law and corporate taxation