



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

Dear NFL Colleague:

The National Football League is proud to be America's most popular and respected sports league. As stated in the League's Statement of Mission and Values, we must maintain an environment that inspires confidence and trust among our colleagues, Clubs, business partners, and the public. At the highest level, we do this by living up to our values. Respect requires that we honor hard work and treat everyone fairly and with dignity. Integrity means that we always look to make the right call. Responsibility to Team means that we support each other to do the right thing. Resiliency requires that we strive for excellence, overcome obstacles, and find solutions. Behind each of these values is the simple message that we must all give complete attention to the best interests of the NFL. We must be thoughtful and consider the consequences of actions that we undertake.

Our Compliance Plan ensures that all employees are aware of their responsibilities to each other, to those we represent, and to those with whom we do business. The Compliance Plan requires each of us to adhere to business practices and procedures that comply with the law and reflect the highest level of integrity. Among other requirements, this means every colleague must recognize and avoid activities and relationships that may tarnish the NFL's reputation; for example, those that involve, or might appear to involve, conflicts of interest.

The Statement of Policy that follows this message sets forth the elements of the Compliance Plan, discusses the obligations of every employee, elaborates on specific areas of our business, and describes the procedures used by the NFL's Compliance Officers in administering the Plan. I ask that you give your full cooperation to the Compliance Officers appointed to administer the Plan. We are all asked to certify that we have reviewed and followed the Compliance Plan and all policies referenced herein. From time to time, the Compliance Officers may ask us to attend specialized compliance training programs. Participation is mandatory.

The NFL is committed to the highest level of integrity in business practices with individuals, organizations, and governments wherever we operate. The Compliance Officers should be advised promptly of any information concerning possible violations of the law or this Compliance Plan by any employee of the NFL. A violation of the Compliance Plan or the law, including failure to report observed or known instances of such activity, constitutes conduct detrimental to the NFL and is subject to disciplinary action, up to and including termination of employment. Retaliation against a person who reports a violation, or assists in the investigation of a reported violation, will not be tolerated.

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

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

ROGER GOODELL  
Commissioner

April 2024

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## **STATEMENT OF POLICY**

### **I. INTRODUCTION**

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

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

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

Furthermore, the NFL expects its employees to recognize and avoid activities and relationships that involve, or might appear to involve, conflicts of interest. A conflict of interest exists whenever an employee's actions on behalf of the NFL might be, or could appear to be, affected by considerations other than the best interests of the NFL, even if such actions are lawful. Accepting significant gifts from business partners or providing services to another organization, including serving on certain boards, could be considered a conflict of interest.

Specific guidelines concerning the avoidance of conflicts of interest are set forth in this Plan and should be strictly observed. We expect our business partners to adhere to the same standards in their dealings with us, as well as with others on our behalf, because some may seek to attribute the actions of our business partners to the NFL. For the purposes of the Compliance Plan, the term "business partners" refers to outside individuals and entities doing or seeking to do business with the NFL or acting on the NFL's behalf.

Following this Statement of Policy are: (1) brief descriptions of the resources available to assist your learning, understanding, and compliance with League policies; (2) procedures regarding how to report information about potential violations of the Compliance Plan; and (3) discussions of issues.

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<sup>\*</sup>The "National Football League," for the purposes of the Compliance Plan, refers to the NFL League Office, NFL Management Council, NFL Enterprises LLC, NFL Properties LLC, NFL Productions LLC, NFL NSI LLC, NFL Ventures L.P., and each of their related subsidiaries and affiliates.

## II. REPORTING AND INVESTIGATING SUSPECTED VIOLATIONS

### A. Obligation to Report

At all times, you are expected to comply with the NFL Constitution and Bylaws, the NFL Personal Conduct Policy, the NFL Employee Handbook, the NFL Gambling Policy, the NFL Information Security Policies, all other NFL policies, rules, and regulations, in their present form and as amended from time to time, and all applicable decisions of the Commissioner. League policies are available on NFL Playbook or by contacting a Compliance Officer. Seek guidance or advice from the NFL Compliance Officers whenever necessary.

#### TIME-OUT #1



**How can I access the NFL Compliance Plan and other League policies?** Employees can access the Compliance Plan and other NFL Policies on Playbook or by contacting an NFL Compliance Officer.

**Who are the NFL Compliance Officers?** The NFL's Compliance Officers are employees designated to administer the Compliance Plan and address Compliance Plan inquiries, disclosures, and potential violations. For 2024, the NFL Compliance Officers are:

- Sabrina Perel, VP, Chief Compliance Officer
  - (212) 450-2390, [sabrina.perel@nfl.com](mailto:sabrina.perel@nfl.com)
- Nick Macri, Director, Compliance
  - (212) 450-2458, [nick.macri@nfl.com](mailto:nick.macri@nfl.com)

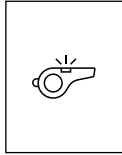
### B. Procedures for Reporting and Investigating Suspected Violations

You are expected to bring to the attention of a Compliance Officer any information you have regarding a violation of the Compliance Plan and/or suspected criminal wrongdoing or violations of law by any employee or agent of the NFL. The NFL requires all employees to come forward with such information, without regard to the identity or position of the suspected offender.

Because failure to report improper or criminal activity can itself be understood to condone the activity, we emphasize the importance of reporting. Failure to report knowledge of illegal conduct and/or violations of this Compliance Plan may result in disciplinary action against those who fail to report. If you are more comfortable reporting to the head of your department, or anyone else in a position of responsibility, please feel free to do so. You may also contact Human Resources or the Legal Department. What is important is that you make the report.

- Information about known or suspected violations must be reported promptly, and we ask that you provide as much detail as possible concerning the matter.
- Employees may visit, call, or email a Compliance Officer directly using the information provided above. Employees may also file a report via the NFL Ethics Hotline, including anonymously, by phone (888-291-6472), or by visiting [NFLEthicsHotline.com](https://NFLEthicsHotline.com).

## TIME-OUT #2



**Can I report a Compliance Plan violation anonymously?** Yes. Employees can make reports anonymously through the NFL Ethics Hotline by phone (888-291-6472), or by visiting [NFLEthicsHotline.com](http://NFLEthicsHotline.com).

- **Investigation.** Reports of suspected violations will be investigated under the supervision of a Compliance Officer utilizing other NFL resources, including Human Resources, Internal Audit, or the Security Department, when necessary. Employees are expected to cooperate in the investigation of reported violations and to provide all information and materials as requested. In addition, employees are expected to abide by all instructions regarding the investigation and maintain confidentiality.
- **Confidentiality.** To the extent practical and appropriate under the circumstances, the NFL will protect the privacy of the individuals involved. However, employees should be aware that Compliance Officers and those assisting them are obligated to act in the best interests of the League and accordingly, confidentiality cannot be guaranteed.
- **Protection Against Retaliation.** Retaliation in any form against an individual who reports a violation of this Policy, or who assists in the investigation of a reported violation, is itself a serious violation of this Policy. Acts of retaliation should immediately be reported to Human Resources, the Legal Department, or the [NFL Ethics Hotline](http://NFL Ethics Hotline) so that appropriate action may be taken.
- **NFL Response.** Upon investigation and confirmation of a violation, the NFL will respond promptly and appropriately. When necessary, the NFL's response may include taking disciplinary action such as termination of the offender's employment and/or updating this Policy in order to better detect and deter such violations in the future.

### III. DISCIPLINARY ACTION

All employees (regardless of full-time, part-time, seasonal, intern, or other employment status) are expected to adhere to this Policy. After appropriate investigation, if a Compliance Officer establishes that this Policy has been violated – whether by unethical or unlawful actions, condoning or failing to report information as to inappropriate or illegal actions by others, failing to cooperate in or assist with an investigation, retaliating against those who report suspected wrongdoing or otherwise – appropriate discipline may result, up to and including termination of employment. The NFL reserves the right to commence civil proceedings or initiate criminal proceedings if, in its sole discretion, it deems such action appropriate in light of the violation established.

#### IV. AREAS OF PARTICULAR INTEREST

We have identified the following areas that deserve particular note in the context of our business.

##### A. Honesty and Fairness

The NFL is engaged in worldwide and varied business relationships with other organizations and individuals and acts as both a seller and buyer of goods and services. Many of us are therefore called upon in the course of our duties to represent the NFL in dealings with third-party entities, organizations, and individuals in addition to our daily interactions with colleagues. Regardless of the identity of the individuals or organizations we deal with, we should always adhere to the following standards:

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

##### B. Confidentiality

In the course of your association with the NFL, you may become aware of non-public information about the NFL, its Clubs, executives of NFL or Club entities, football players – including former, current, and draft-eligible players – business partners such as licensees, sponsors, and television networks, and other individuals or entities. “Non-public information” includes, but is not limited to, information obtained by virtue of your position with the NFL that is confidential or has not been disseminated to the public at large. You should never disclose or threaten to disclose non-public information to anyone outside of the NFL, either directly or indirectly, or to anyone who is or could be adverse to or competitive with the NFL unless authorized to do so. This prohibition applies even after you leave your employment with the NFL, to the extent permissible by law. Compliance with this Policy is critical to our efforts to ensure NFL, player, and team information is not used for improper purposes, including gambling, and protects the integrity of our game.

Any breach or threatened breach of this provision may result in disciplinary action for current employees, up to and including termination of employment, as well as injunctive relief or other remedies available in law and/or equity for both current and former employees or any individuals covered by this Policy, as the NFL expressly reserves all rights and remedies. Any unauthorized disclosure of non-public information of which an employee becomes aware should be reported immediately. Further, any inquiries from reporters or other members of the media should be referred to the Communications Department for response.

## C. Accurate and Complete Records

Accurate records play a vital role in assuring the maintenance of high ethical standards. All NFL information you maintain in the course of our job function must be recorded accurately, completely, and in a timely manner. It is a violation of the Compliance Plan to falsify information in NFL records.

In particular, it is critical that business transactions are recorded accurately and completely. As such, never make false or artificial entries in the NFL's business or financial records. Never understate or overstate reports of sales or expenses, or alter any documents used to support those reports. All assets and liabilities must be recorded in the regular books of account. Use the best available information for any estimates and ensure that you can support any assumptions made.

When committing the NFL to use suppliers for goods or services, employees must follow the procedures outlined in the [Requisition Training](#) and found on [Playbook](#). Employees are further subject to the [Contract Management Policy](#) (section O below). Purchase orders are expected for the majority of committed expenses. Payments will not be processed without evidence of an approved purchase order. For the purchase of physical goods, employees must verify that the physical goods were received prior to invoice payment in accordance with the Requisition Training.

Each requisition and invoice initiated in the Oracle financial system requires the approval of a director or above (based on dollar limits set within Oracle). Instructions on how to review requisitions and invoices can be found in the [Approvals Requisition and Invoice Training](#).

## D. Fraud

Each of us is expected to adhere to the highest ethical and professional standards in carrying out our responsibilities as NFL employees. As such, fraud and any related misconduct will not be tolerated in any form and may result in termination of employment and possible criminal and civil liability. Fraud is defined as any knowing misconception or misrepresentation of the truth or concealment of a material fact to induce another to act in his or her detriment or to deceive a party, including the NFL. Employees are reminded of their affirmative obligation to report fraud. Reports may be made to your department head, a Compliance Officer, or a member of the Internal Audit staff.

### TIME-OUT #3



**I submitted five parking receipts totaling \$150 in a recent Travel & Expense report. I put all five receipts in for reimbursement when, in fact, two of the parking receipts were for personal trips. Is this fraud?**

Yes. Fraud is defined as a knowing misrepresentation of the truth. Having the NFL reimburse you for personal expenses constitutes fraud.

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

## E. Anti-Corruption

It is a violation of NFL policy to offer bribes and other improper advantages in connection with the activities of the NFL. The NFL is committed to complying with all applicable anti-bribery and anti-corruption laws, including the United States Foreign Corrupt Practices Act (“FCPA”), the United Kingdom Bribery Act (“UK Bribery Act”), U.S. federal, state, and local anti-corruption laws for government officials, and anti-corruption laws in Australia, Brazil, Canada, China, Germany, Mexico, and any other countries in which the NFL conducts business. Bribery, kickbacks, and other improper inducements or payments to government officials, business partners, vendors, and suppliers are prohibited. No NFL employee may, directly or indirectly, offer, promise, pay, give, or authorize any financial or other advantage, or anything else of value, to any other person or organization, with the intent to exert improper influence over the recipient, induce the recipient to violate his or her duties, secure an improper advantage for the NFL or its Clubs, or improperly reward the recipient for past conduct. All employees are further prohibited from demanding, agreeing to receive, or accepting a bribe, kickback, or any other improper financial or other advantage. Please note that anti-bribery and anti-corruption laws and League policies also apply to individuals and entities that do business on behalf of the NFL.

The NFL engages in activities outside the United States. Under the FCPA, it is illegal for any NFL employee, business partner, or third-party representative acting on the NFL’s behalf to give anything of value, directly or indirectly, to a foreign government official or employee, a foreign political party, or a candidate for foreign political office, if doing so could reasonably be understood to be part of an improper effort to obtain or retain business for the NFL. No improper payment or benefit of any kind, whether it is in cash or other value provided, should be made to any government official, employee, or entity outside the United States. Except under limited circumstances, employees should seek prior approval from a Compliance Officer before providing any gifts, game tickets, meals, or other hospitality to any government official. (Note: as provided in the [NFL Anti-Corruption Manual](#), there are limited exceptions to this pre-approval requirement.)

Within the United States, a complex network of federal, state, and local laws and regulations exist for dealing with U.S. government officials and agencies; for example, gifts to U.S. government officials are highly regulated and restricted, regardless of the purpose of the gift. In addition:

- It is often illegal to give a government official anything of value for or because of their past or future action, even if not for corrupt purposes;
- Advocacy directed at, or an attempt to influence, government officials on behalf of the NFL may be regulated as lobbying;
- Political contributions may be regulated as to source and amount; and
- Employees may not use NFL corporate resources for personal political purposes (e.g., hosting a campaign fundraiser at NFL offices or using NFL staff or resources, including stationery and stamps, to send invitations to the fundraiser).



Employees should be aware of these laws and policies before acting and must consult with a Compliance Officer if contemplating engaging in any of these activities.

#### TIME-OUT #4



**Employees based in the Mexico City office would like to invite certain executives of a potential media partner, which is partially owned by the Mexican government, to a game in London so the potential partner can observe an International Game. What action is required to ensure their invitation does not trigger a violation of the NFL’s Anti-Corruption Manual?** Contact a Compliance Officer to seek approval BEFORE extending any invitation. By way of example, League employees should be prepared to discuss with a Compliance Officer the purpose of the invitation, the League’s contacts with the media partner and its executives, and details on the nature of the local executives’ roles and responsibilities at the media company.

When considering offering game tickets, hospitality, meals, or merchandise swag to a government official, first contact a Compliance Officer, who can answer questions concerning the Anti-Corruption Manual and discuss with you the circumstances surrounding your proposed invitation or gift and whether it may be permissible under both anti-bribery laws and the internal rules and policies of the proposed invitee’s agency or company. Note: for purposes of the Anti-Corruption Manual and certain anti-bribery laws, employees of government-owned or controlled entities – such as state-owned media companies – are considered government officials.

The [Anti-Corruption Manual](#) can be found on Playbook, along with the related [Anti-Corruption Manual Control Forms](#). A [Resource Guide](#) that addresses key provisions of the Manual and explains how you can help mitigate corruption risk can also be found on Playbook.

#### TIME-OUT #5



**I work in Events and have been asked to provide a complimentary Draft ticket to the mayor of the Draft host city. Can I provide this ticket?** It depends, as the relevant laws are complex and can be quite restrictive. Under the Anti-Corruption Manual, you must seek pre-approval from a Compliance Officer BEFORE extending any complimentary tickets to a federal, state, or local public official.

#### F. Conflicts of Interest

You should never engage in an activity that conflicts with the best interests of the NFL, or that gives the appearance of creating a conflict with the best interests of the NFL. A conflict of interest arises when you engage in outside or personal activities that could influence the decisions that you make for the NFL. For example, if your position requires you to determine which of two apparel companies should get an exclusive NFL license, the fact that you own stock in one of the companies may, or may appear to, significantly influence your decision. Under such circumstances, it is possible that your personal interest will receive, or be perceived as receiving, a

higher priority than the best interests of the NFL. Even if you are acting in the best interests of the NFL, the mere appearance of a conflict or other impropriety can be harmful to the NFL, and recusing yourself from the decision might be the best recourse.

Reasonable persons may not want to deal with the NFL if they question your ability to make impartial business decisions. The best interests of the NFL are always served by compliance with the law and this Compliance Plan. Should a conflict or the appearance of a conflict arise, please seek guidance from a Compliance Officer immediately.

#### TIME-OUT #6



**I have been invited by an NFL media partner to attend a Los Angeles Lakers game with courtside seats and dinner to be provided. I understand that the NFL is considering expanding its relationship with this partner. If I accept, does that violate the NFL's Conflicts of Interest Policy?** Not necessarily, as the invitation may be considered local and reasonable under the circumstances, but it should be discussed in advance with a Compliance Officer since the NFL and the existing media partner are discussing expanding the scope of their business deal, and it could look as if the tickets were an inducement for the relationship to grow. If approved by Compliance, it may also need to be approved by your department head.

Generally speaking, a conflict of interest arises when an employee has a competing interest or loyalties that are, or could be, at odds with each other. These competing interests may occur as a result of engaging in outside or other personal activities, or due to personal relationships. Circumstances that give rise to a conflict of interest include, but are not limited to:

- Hiring a family member's company to provide services to the NFL;
- Having an ownership interest in an entity retained as a vendor to the NFL;
- Having an ownership interest in a company that is an NFL licensee or business partner;
- Having an ownership interest in an entity that produces supplies or products purchased by the NFL;
- Serving on a board of directors of a company that provides services to or competes with NFL business;
- Serving as an advisory board member of an entity that does business with the NFL or competes with the NFL;
- Accepting a significant gift from a business partner or potential business partner (see Section G of this Policy); and

- Accepting travel and entertainment provided by a business partner or potential business partner.

Below are policies that address specific conflicts of interest:

**Outside Employment or Services:** Conflicts of interest can arise when securing employment or providing services to organizations outside of the NFL. A conflict can arise from performing outside work for a number of reasons, including:

- the outside work requires a time commitment that impedes your ability to perform your NFL duties;
- the outside work would require you to use your NFL contacts, knowledge, or resources to benefit another company;
- the outside work competes with the NFL, a Club, or NFL partner;
- the outside company or organization you are providing services to is an NFL partner or vendor; and
- the outside work is prohibited under the [NFL Gambling Policy](#) or another League policy.

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

- ❖ **Full-Time Employees:** Prior to accepting any outside employment or providing services to an outside organization, you must obtain Compliance approval and notify Human Resources. Please reach out to a Compliance Officer to discuss.
- ❖ **All Other Employees:** You must disclose any outside employment or services you provide on your annual Compliance Plan certification. If you obtain outside employment after you submit your annual certification, you must inform a Compliance Officer of the outside work.

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

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

**Business Interactions:** In dealing with individuals and entities that are doing or seeking to do business with the NFL, or that are acting on the NFL's behalf as business partners, you are expected to act in a manner that is in the best interests of the NFL. You are expected to select the NFL's sponsors, licensees, vendors, suppliers, contractors, consultants, agents, and other business partners solely on their merits, and in compliance with all NFL policies, including the [Contract Management Policy](#), and without regard to non-business considerations.

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

#### TIME-OUT #7



**Following the season, a game day technology provider wants to give a gift card and/or a small thank you gift to NFL Football Operations employees in recognition of their hard work and collaboration throughout the season. Can NFL employees accept these gifts?** You should consult with a Compliance Officer before giving or accepting gifts, including gift cards. Not only might gifts under these circumstances create a conflict of interest, or the appearance of a conflict of interest, with a vendor, it may also violate the Gift Policy (see Section G of this Policy) and possibly violate the gift policy of the vendor.

Please be advised that the NFL expects you to recognize and avoid activities and relationships that involve, or might appear to involve, conflicts of interest, as well as behavior that may cause embarrassment to the NFL.

The following are examples of prohibited conduct or relationships with respect to NFL business partners, but in no manner should this be construed as an exhaustive list:

- Direct or indirect solicitation, receipt, or delivery of a bribe, kickback, gratuity, or other payment from or to any business partner in consideration of doing business;
- Direct or indirect solicitation, receipt, or delivery from or to any business partner of payments, services, gifts, loans, special discounts, or other inducements not generally available to NFL employees or to the general public (see Section G of this Policy);
- Personal financial involvement or ownership of an interest in a business partner (that is not disclosed and authorized or approved in accordance with this Compliance Plan);

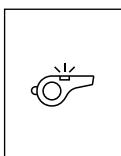
- Providing independent consulting, employment, or other personal services to, or personally investing with, any business partner, or any player, agent, Club executive, game official, or any individual who owns or operates an NFL Club;
- Participating in a business or investment opportunity made available to you by virtue of your position at the NFL and not available to others inside or outside the NFL (e.g., accepting the opportunity to purchase shares on a preferred basis in an initial public offering of a current or potential NFL business partner or serving on an outside board);
- Soliciting donations for charitable or civic organizations from business partners or spending or authorizing the spending of NFL funds for such purposes, in circumstances where you gain significant personal benefit from such activity. This Policy is not intended to prevent employees from supporting charitable organizations as a matter of civic or social responsibility, either financially or through personal service or encouraging partners to support NFL charitable interests either financially or through personal service;
- Engaging in outside activity of any type that is so substantial, as to call into question the employee's ability to devote appropriate time and attention to their job responsibilities with the NFL; and
- Using your position with the NFL to take advantage of NFL resources for outside personal activities or gain. Such resources include but are not limited to: (i) personnel, including NFL On-Air Talent or production staff; and (ii) office space or resources, including NFL studios or equipment, such as cameras and associated items.

#### TIME-OUT #8



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

#### TIME-OUT #9



**A friend and I would like to start a podcast where we talk about pop culture and sports, including the NFL. Are there any limitations on what we discuss on the podcast?** As an NFL employee, you should never represent that you speak on behalf of the NFL and you should not discuss the following on your podcast:

- Any League or Club confidential or proprietary information, including NFL Media research or inside information you may

have access to. For example, information relating to player injuries, roster moves, disciplinary matters, and business decisions prior to public announcement.

- Betting lines on the NFL or any other sports. You should not make picks on NFL games.

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

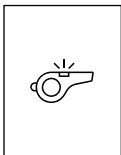
**What if I record segments of the podcast while working at Super Bowl or Draft?** Under these circumstances, capturing or otherwise creating content for your own personal use or advantage is inappropriate. NFL employees must use the unique access they have to NFL events responsibly and refrain from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

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

Anything that would constitute a conflict of interest on the part of an employee is also unacceptable if engaged in through, or in benefit of, a third party, such as a spouse, family member, close friend, or any other person or entity with whom the employee is closely identified or in which the employee has any significant ownership or financial interest.

If you have any doubt as to whether your situation involves a conflict of interest or an appearance of impropriety, consult with a Compliance Officer before proceeding. If you learn after the fact that a conflict exists, or if you previously were or currently are involved in a conflict of interest, you should promptly disclose it to a Compliance Officer so that it may be resolved appropriately.

#### **TIME-OUT #10**



**I work in Sponsorship, and my NFL job responsibilities include managing the account for the NFL's relationship with ABC Beverage Company, an NFL sponsor. My spouse is applying for a job as an executive in sales at ABC Beverage Company. Do I need to disclose this situation to a Compliance Officer?** Yes. Disclose in order to avoid a conflict of interest and the appearance that NFL confidential information could be shared with ABC should your spouse work as an executive in their sales department. Keep in mind, if your spouse is hired, the NFL may choose to modify your job responsibilities if it deems your spouse is in a role at ABC Beverage Company that could present a conflict of interest.

## G. Gifts, Entertainment, and Other Business Hospitality Between NFL Employees and Business Partners and Others

Under no circumstances should you solicit a gift, regardless of its value, from business partners. Further, it is a violation of the Compliance Plan to **accept** a **significant gift** from business partners or to **give** a **significant gift** to business partners unless it is first cleared with a Compliance Officer. Your department head may also need to review the giving or acceptance of such a gift. Business partners include sponsors, licensees, content distributors, advertisers in NFL-controlled media, other NFL customers, and NFL vendors and service providers. A **significant gift** is one valued in excess of Two Hundred Fifty Dollars (\$250), or a series of gifts received over the course of a twelve-month period from a single business partner that have a cumulative fair market value in excess of Two Hundred Fifty Dollars (\$250). Finally, gifts to any federal, state, or local government official must first be cleared with a Compliance Officer. (Please see Section E regarding gifts to non-U.S. government officials.)

The following are procedures that employees must follow when giving gifts to business partners or receiving gifts from business partners:

- Any significant gift must be reported to a Compliance Officer directly;
- Employees are responsible for tracking the value of gifts received or given for purposes of determining whether gifts given or received over the course of a twelve-month period constitute a significant gift. Accordingly, employees should create and maintain a gift-log that tracks the date of the gift, the approximate value of the gift, and the business partner associated with the gift;
- If a business partner gives you gifts that individually or cumulatively are valued in excess of Two Hundred Fifty Dollars (\$250), you should explain our policies to that business partner and request approval from a Compliance Officer before you accept them. Such an approval request should be sent in writing. If advance approval is not possible, you must request approval within seven (7) days of receipt of the gift. If approval is not granted, you should decline the gift or return it;
- If declining or returning a prohibited gift is not practicable, an alternative solution will be arranged by a Compliance Officer. Examples of such solutions are donating the gift to charity, distributing a food basket or similar gift among members of your department, holding a lottery for the gift among employees, or having the employee pay fair market value to the business partner for the prohibited gift;
- If the person offering you a gift urges that you not disclose the gift, you should report those statements promptly and either decline the gift or turn it over to a Compliance Officer;
- If you anticipate possibly receiving a significant gift (for example, if doing business in certain countries where such gift-giving is customary, or if you are aware that a business partner has provided such gifts in the context of its other business relationships), you

should review the matter in advance with a Compliance Officer and also possibly your department head;

- If you contemplate giving a significant gift (for example, if doing business in certain countries where such gift-giving is customary), you should review the matter in advance with a Compliance Officer and also possibly your department head;
- If you contemplate giving any gift, regardless of value, to a public agency or its employee, you should review the matter in advance with a Compliance Officer to avoid any violation of the public agency's conflicts of interest or gift policies;
- No payment of any kind, whether it is in cash or other value provided, should be made to any government official or entity without consulting a Compliance Officer in order to determine whether the payment would be prohibited. Individually and legally made campaign contributions are not considered gifts subject to this rule; and
- Unless authorized, receipt of any fees or significant gifts for contributing to media or social media, or for speaking at an engagement or other event concerning your role with the NFL or because you are an employee of the NFL, is not permitted. In addition, employees must refer any speaking engagement requests and opportunities to the NFL Communications Department.

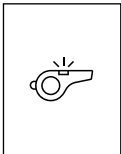
Exceptions to the above restrictions on receiving and giving significant gifts may be allowed in special circumstances and require disclosure to and approval by a Compliance Officer and also possibly your department head. Such disclosure and approval should come in advance of receipt of such gift, if possible. If you are in doubt as to whether to give or accept a gift, consult with a Compliance Officer. Such exceptions may include, but are not limited to, the following:

- You may be permitted to receive a significant gift if you can demonstrate that you have a separate relationship outside of your NFL employment with an individual from whom you receive the gift and such gift was provided in a manner that would not otherwise be deemed to gain business favor for future NFL business or to thank for past NFL business awarded;
- You may be permitted to receive a significant gift if the business partner has a legitimate business reason to provide the gift (for example, a licensee providing licensed products to individuals for use at an NFL event) and the gift is the type of product the business partner normally offers consumers in the course of its business;
- Receipt of an item that is part of a standard gift package provided by the business partner to all NFL employees at NFL events is not considered acceptance of a significant gift;
- Acceptance of entertainment by a business associate is permissible as long as the entertainment is reasonable (e.g., dinner, sports events) and either (i) does not involve travel occurring outside of the local area, or (ii) if occurring outside of the local area, involves travel that has been paid for by you personally or by the NFL;



- Entertaining a business associate does not constitute the offering of a significant gift as long as the entertainment is reasonable and (i) does not involve travel occurring outside of the local area, or (ii) if occurring outside the local area involves travel that has been paid for by the business associate;
- Distribution of standard NFL gift packages, by you or your department, to business partners at NFL events (e.g., Super Bowl) does not constitute the offering of a significant gift; and
- Although gifts that fall within an exception as described above might not count against the Two Hundred Fifty Dollars (\$250) calculation that employees must track for purposes of determining whether gifts given or received over the course of a twelve-month period constitute a significant gift, they must all be reported in real-time to Compliance.

### TIME-OUT #11



**A business partner invited me to participate in a golf tournament where the winner is awarded a new set of golf clubs. If I win, can I accept this prize?** You should consult with a Compliance Officer to determine whether this may be acceptable under the Compliance Plan.

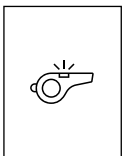
The cost of the golf outing plus the value of the prize should be reviewed to determine if one or both could be considered a significant gift.

**Please note that all significant gifts – whether accepted or declined – must be reported to a Compliance Officer. NFL executive management is provided a summary of significant gifts.**

Please further note that as gift-giving to and from club personnel occurs from time to time, you should consult with a Compliance Officer concerning any questions you may have about such gifts and avoiding conflicts of interest.

Finally, employees are prohibited from giving gifts of any value to the NFL’s “onsite vendors” such as mailroom, travel, reception, IT and similar non-employee staff who may provide services at our office locations. The [Onsite Vendor Gift Policy](#) provides further information in this regard.

### TIME-OUT #12



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

## H. Ownership and Trading of Securities

To (i) ensure the integrity of our decision-making processes, (ii) avoid any appearance of impropriety or conflicts of interest, and (iii) avoid concerns about the possibility of insider trading, NFL employees may not take advantage of any business opportunity in any public or private enterprise, or any parent, subsidiary, or affiliate of such enterprise, resulting from such NFL employee's employment with the NFL (this includes relationships with any such enterprise with which the NFL or a Club or an owner of a Club does business, as well as NFL or Club sponsors, licensees, significant marketing partners or vendors, and other significant business partners). This does not prohibit an ownership interest (a) through a blind trust or mutual fund-type arrangement, or (b) if the company is sufficiently large (e.g., public companies with market capitalization in excess of \$1 billion) and the employee's ownership interest is *de minimis* and therefore unlikely to be considered material to the partner's financial condition. Compliance approval is needed prior to investing in or joining the board of a Special Purpose Acquisition Company (SPAC).

NFL employees are required to conduct due diligence, including, but not limited to, reviewing public records to determine if investment in a particular company is permissible under these rules.

There may be instances in which an NFL employee's ownership of an interest in a business partner may not, in the judgment of a Compliance Officer, implicate the policies underlying the above restrictions. If an employee wishes to own an interest in a business partner that is not in compliance with these provisions, prior approval must be obtained from a Compliance Officer.

It is against NFL policy (and the law) for any employee to engage in "Insider Trading", which commonly refers to the use of material non-public information in connection with the purchase or sale of a publicly traded security. It is also illegal to trade on material non-public information obtained as a result of your NFL employment, in a way that attempts to hide or mislead others regarding the true identity of the trader. Under no circumstances may an NFL employee invest or divest any shares in a company if the NFL employee is aware of material, non-public, and confidential information about the company.

For purposes of the foregoing rules, (a) any reference to "employee" includes members of an employee's immediate family and/or household, and (b) any reference to "ownership" includes ownership in the employee's name or the name of a broker, bank, or other nominee or agent. Any employee whose current ownership in a company is prohibited by reason of the foregoing policies should contact a Compliance Officer to discuss the matter.

## I. Service on Corporate or Charitable Boards of Directors

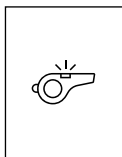
From time to time, employees may be asked to serve on a board of directors or advisory board of a corporation, charity, or other organization. The League respects these commitments and encourages all employees to be involved in civic or charitable activities of their choice. However, certain procedures should be followed to avoid conflicts of interest or the appearance of impropriety.

- Unless you will be offering unpaid voluntary service to an educational, charitable, residential, and/or religious organization that is entirely unrelated to sports, media,

entertainment, or gambling, you must obtain advance approval of board service from a Compliance Officer and possibly also your department head;

- With respect to boards of corporations or other organizations, a Compliance Officer may request further information concerning: (i) whether the corporation or organization is, or may become, a vendor or partner to the NFL, or the NFL a vendor or partner to it; (ii) whether the NFL and the corporation or organization have, or potentially may have, competing businesses, services, or products; (iii) equity, compensation, or other fees you may receive or be awarded by virtue of your board position; and (iv) whether the corporation or organization has requested that you enter into an agreement with it concerning your board position;
- For-profit corporations should provide appropriate levels of D&O insurance and should fully defend and indemnify you and the NFL for any costs or claims that the NFL or any Club may incur as the result of your board service. If your board service is approved by a Compliance Officer, you may be required to periodically update Compliance regarding your position. For example, a Compliance Officer may grant approval subject to your continuing obligation to notify a Compliance Officer concerning matters pertaining to (i) or (ii) above and/or whether to recuse yourself from certain business decisions. There may be changed circumstances resulting in Compliance revoking its prior approval. At all times, you should seek guidance whenever the potential for conflicts or competing interests arises;
- Board service must be strictly in your personal capacity and not as a representative of the NFL;
- Board service must not detract from or conflict with your ability to fully and faithfully perform your NFL duties. You may be requested to document the amount of time spent on your outside commitment to ensure that it does not interfere with your NFL duties;
- You should not use NFL personnel or office resources to perform services in connection with outside commitments unless you obtain advanced approval from a Compliance Officer and the NFL is reimbursed a fair amount; and
- It is highly advisable for you to ensure that any not-for-profit organizations you serve maintain adequate insurance coverage for directors and officers. If the organization does not carry such insurance, you should consult your own agent or broker to determine whether you already have or should separately purchase such coverage.

### TIME-OUT #13



**I work in the International group on social media initiatives. I was asked to join the advisory board of a startup tech company that offers unique services for use on social media platforms that the NFL is considering using. Do I need to disclose this situation to a Compliance Officer?** Since the startup is in the media space and because there is the

potential for a conflict of interest, you must contact a Compliance Officer to discuss your board service prior to accepting this position

#### J. Business Development Opportunities

The NFL is constantly exploring business development opportunities, including ways to grow its existing businesses and to develop new sources of revenue. You are expected to immediately notify the NFL regarding business opportunities that you reasonably should know the NFL is or might be interested in pursuing, and to avoid personal involvement in business opportunities that might conflict with the NFL's interests. The following are examples of prohibited conflicts:

- Competing with the NFL, directly or indirectly, in the development or implementation of a business opportunity;
- Personal financial involvement in or the provision of consulting, employment, or other services to any business program or venture that competes or potentially could compete with the NFL;
- Personal financial involvement in or the provision of consulting, employment, or other services to any business program or venture in which the NFL is a participant or is likely to be a participant;
- Using NFL assets, facilities, or services for the personal benefit of you or someone else;
- Ownership of property affected by the NFL's actions, or acquired as a result of NFL-related non-public or confidential information; and
- Spending time setting up or consulting other businesses or seeking clients for a new venture in expectation of leaving the NFL, during regular NFL business hours, while still employed by the NFL.

#### K. Gambling

Gambling and gambling-related activities can pose a serious threat to the integrity of professional football and public confidence in the NFL. Employees are strictly prohibited from participating in or facilitating any form of illegal gambling, whether on sports or otherwise. As set forth in the NFL [Gambling Policy](#), employees (and other NFL Personnel) are subject to the following prohibitions concerning gambling activities, regardless of whether the activities are legal in a given state or location:

- No placing, soliciting, or facilitating any bet, whether directly or through a third party, on any NFL game, practice, or other event. This includes betting on game outcome, statistics, score, performance of any individual participant, or any other kind of "proposition bet" or parlay betting;

- No placing, soliciting, or facilitating bets on any other professional (e.g., NBA, MLB, NHL, PGA, USTA, MLS, WNBA), college (e.g., NCAA basketball), international (e.g., World Cup), or Olympic sports competition, tournament, or event;
- Unless duly authorized, no using, disclosing or providing access to confidential, non-public information regarding any NFL game or event, including but not limited to: (a) a participant's availability for or performance in an NFL game or event; or (b) personnel-related decisions regarding an official, player, coach, or League or Club executive, including team rosters and game working assignments;
- No entering, visiting, or using a sportsbook at any time during the NFL playing season;
- No gambling in any Club or League facility or venue (e.g., practice facility, stadium, team hotel, Draft site, or other League event site); on any League or Club charter or other transport; while traveling on Club or League business; or while making an endorsement or promotional appearance;
- No accepting prizes with a value in excess of Two Hundred Fifty Dollars (\$250) in any season-long fantasy football game, participating in any "daily" or other similar short duration fantasy football game that offers a prize, or participating in any fantasy football game (including daily, season-long, or other format) if participation is prohibited by applicable law or regulation;
- Employees (and other NFL Personnel) may hold certain investments in publicly traded companies with sports betting revenue, as authorized under the Gambling Policy and as pre-approved by NFL Compliance, where required. Ownership is permitted in gambling entities, defined as "[a] casino, sportsbook, or other establishment or business that offers commercial gambling":
  - through mutual fund accounts not designated as self-directed, or other passive diversified accounts; OR
  - in shares of a publicly traded company, provided: (i) the shares held are a *de minimis* percentage of the company's shares outstanding, (ii) the company's primary business is something other than Sports Betting Operations (as defined in the Gambling Policy), and (iii) the NFL employee holding such shares has no role with the company and no access to its non-public information.
    - Employees (and other NFL Personnel) are required to seek guidance from a Compliance Officer before making an investment pursuant to this exception. Employees (and other NFL Personnel) will be required to divest their shares in the company should any of (i), (ii), or (iii) no longer be applicable; and
- Employees (and other NFL Personnel) may not work for, or operate, in whole or in part, directly or indirectly, a gambling entity.

The Gambling Policy requires that you report the disclosure or loss of confidential, non-public information or if you are approached by a third party asking for such information or a “tip”.

The complete [Gambling Policy](#) is available on NFL Playbook or can be obtained from a Compliance Officer.

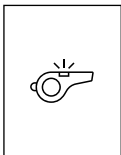
#### TIME-OUT #14



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

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

#### TIME-OUT #15



**My friend asked me to enter a NCAA March Madness tournament bracket. I am not required to pay an entry fee, but a \$100 cash prize will be awarded to the winner. Can I enter the bracket?** No. The potential for receiving a prize for college sports betting makes this opportunity prohibited.

#### L. Game and Event Tickets

**NFL Game and Event Tickets (“NFL-Issued”):** With no exceptions, employees may not profit, even if only by one dollar, from the re-sale of a ticket obtained from the League, a Club, or a business partner to any NFL game (including pre-season, regular season, post-season, or Super Bowl) or League- or Club-sponsored event (e.g., NFL Super Bowl Tailgate Party, NFL Honors, NFL Draft, team party, or other). Such re-sale is prohibited whether it is considered selling, bartering, or trading and regardless of whether the transaction is legal in a given state. Such re-sale is prohibited whether the ticket was provided for free, has no face value, or was purchased at face value. Accordingly, (i) if you obtain such tickets on a complimentary basis, you may not sell the tickets for any price or trade them for personal gain; (ii) if you pay face value for the tickets, you may not sell them at any price greater than face value; and (iii) if you pay an amount less than face value for the tickets, you may not sell them for more than you paid to obtain them. Additionally, no other designee, e.g., family or friends, may profit or otherwise benefit from the transfer or sale of such tickets.

Employees will be held accountable for the actions of any third party to whom they either directly or indirectly sell or give NFL Game or Event Tickets. If you can permissibly sell or give such tickets to a friend or acquaintance, you must explain to that person that the ticket cannot be

transferred or re-sold in violation of this Policy, and if that person ignores your advice, you will be held responsible as if you yourself engaged in the transaction.

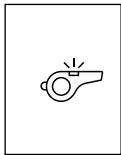
If you wish to donate a ticket that was obtained from the League, a Club, or a business partner to a charity for inclusion in a raffle prize or auction donation, you must report the transaction to a Compliance Officer at the time of the transaction using the [NFL Raffle Ticket Form](#) on Playbook or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

Note: Per the NFL Pro Bowl and Super Bowl Staffing and Attendance Policy, employees who receive complimentary game or event tickets (e.g., NFL Super Bowl Tailgate Party) as working staff who are subsequently removed from the working staff assignment list or whose date of departure has changed so they are no longer in attendance through the completion of the game or event, are required to return their tickets to the League. Supervisors who become aware of removals from the working staff list must promptly notify the Events Department so tickets can be properly revoked and/or reassigned. These requirements further apply to employees whose employment with the League is terminated prior to the game or the event.

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

Employees are responsible for reviewing and understanding this Compliance Plan “Use of Tickets” Policy, the [NFL Game Ticket Policy](#), the [Anti-Corruption Manual](#), and all other existing League policies with regard to this subject matter, including those pertaining specifically to Super Bowl tickets – regarding both purchasing tickets and receiving them as working staff – as available on Playbook, or by contacting a Compliance Officer.

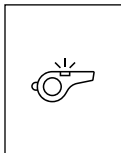
#### TIME-OUT #16



**My boss bought 49ers tickets from the NFL at face value and sold them to me for half-price when she learned she couldn’t attend. I now have a conflict as well. Can I sell them to my neighbor for face value?**

No. The Compliance Plan prohibits the re-sale of NFL-issued tickets for any profit, even if you are re-selling the ticket at face value.

#### TIME-OUT #17



**I purchased two tickets to the Super Bowl from the League at face value. I sold the tickets, also at face value, to “a friend of a friend” that I have never met or spoken to. Could this violate the Compliance Plan?** You complied with the Policy prohibiting the sale of game tickets obtained from the League for more than face value.

However, you did not comply with the Policy that applies when you give or sell game tickets to a friend or acquaintance, which requires you to explain to that person that the ticket cannot be transferred or re-sold

in violation of League policy. If the tickets are re-sold for more than face value, you will be held responsible as if you yourself engaged in this transaction.

#### M. Profiting from Certain League or Club Gifts

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

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

#### N. Compliance with Antitrust Laws

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

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

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

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

Please contact the Legal Department whenever you have a question relating to the laws



governing competition or concerns about the possible anti-competitive effect of particular transactions.

#### O. Contract Management Policy

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

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

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

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

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

#### P. Intellectual Property

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

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

#### Q. Use of Social Media

The growth of social media platforms such as TikTok, X (formerly Twitter), YouTube, Instagram, Snapchat, and Facebook has created important new ways for the NFL to communicate with fans. We define social media as interactive computer-mediated technologies that facilitate the creation and public sharing of information, pictures, ideas, and other content across virtual communities and networks. The NFL has been at the forefront of the use of new platforms and will continue to emphasize innovative and appropriate use of these forms of communication. While these platforms present opportunities, we must be mindful of longstanding policies that serve to protect the League's core values, the integrity of our game, and our long-term business interests. Accordingly, all employees are expected to adhere to the following principles:

- All employees who believe they have a business purpose that necessitates the use of social media platforms for official NFL communications (i.e., to post messages on social media on behalf of the NFL) must first contact the NFL Communications Department for approval;
- Employees may receive questions on social media regarding issues relating to the League. Employees may not, under any circumstances, respond on behalf of the League without prior approval;
- If given approval to use social media for official NFL communications, all communications and statements made through social media must be professional, accurate, and consistent with all NFL policies and procedures;
- The very public and immediate nature of these sites renders any post or comment "on the record," available to the media, public, and NFL business partners, and subject to discovery in litigation matters;
- Making confidential or privileged information public will subject an employee to discipline, up to and including termination of employment;
- Any comment on a social media site (whether made on behalf of the League or otherwise), or through any other venue, that violates League policies (including

the Equal Employment Opportunity and Non-Harassment Policy), including misrepresenting one's job responsibilities, is prohibited and will subject the employee making such comment to discipline, up to and including termination of employment;

- Employees who have personal social networking accounts, including, but not limited to, TikTok, X, YouTube, Instagram, Snapchat, and Facebook pages, may not use them to communicate on behalf of the NFL;
- Employees should not hold themselves out as having the authority to speak on behalf of the NFL and should not use social media handles/monikers that suggest or imply any authority to speak on behalf of the NFL;
- Except as authorized, employees in the Officiating Department are prohibited from commenting on NFL matters on any social media site at any time, including on Game Day;
- Any comment or post made by an NFL employee on social media reflects on the NFL and must be in accordance with NFL standards of conduct;
- Employees must respect all copyright and other intellectual property laws when it comes to the use of logos and trademarks of the NFL and its Clubs; and
- The NFL reserves the right to require that employees withdraw certain posts, avoid discussing certain League-related subjects, and remove comments in violation of this Policy. Importantly, however, nothing in this statement, or in the rest of this Use of Social Media Policy, is meant to restrict employees from collectively discussing the terms and conditions of their employment with the NFL.

#### R. Media Inquiries

Employees must refer all media inquiries and speaking engagement requests and opportunities to the NFL Communications Department. Employees may not, under any circumstances, respond to media inquiries on behalf of the League without prior approval.

Employees should not hold themselves out as having the authority to speak on behalf of the NFL and should not use social media handles and monikers that suggest or imply any authority to speak on behalf of the NFL.

In addition, any press releases or other information provided to the media, whether promotional, informational, or otherwise, which is or will reasonably appear to be provided on behalf of the NFL, must be approved in advance by the NFL Communications Department.

#### S. Information Security Policies

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

#### T. Document Management Policy

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

#### U. Artificial Intelligence Policy

All employees must comply with the NFL's [Artificial Intelligence Policy](#), which may be accessed on Playbook.

#### V. Data Privacy

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

#### W. Expectation of Privacy

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

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

#### X. Right of Publicity Release

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

I understand that, in connection with my work at the National Football League ("NFL") offices, I may be identified, interviewed, filmed, or photographed, or that my image may appear in film, video, or photographs taken during activities or events organized or conducted by the NFL, and hereby grant the NFL, NFL Ventures, L.P., NFL Properties LLC, NFL Productions LLC, and each of their parents, subsidiaries, affiliates, successors and assigns, and each of their respective shareholders, officers, directors, employees, agents, representatives, and licensees (collectively, the "NFL Entities") the irrevocable,

perpetual, worldwide, and royalty-free right, but not the obligation, (a) to take such interviews, testimonials, photographs, films, or videos containing my name, identity, and/or likeness (the “Images”), and (b) to copy, modify, adapt, distribute, publish, display, exhibit, and otherwise use, either in whole or in part, the Images, or my name, identity, and/or likeness, for any purpose whatsoever, including, but not limited to, advertising purposes, or for the purposes of trade, in all media now known or hereafter created, throughout the universe, in perpetuity. I understand and agree that the Images may or may not contain attributions specifically identifying me, and I hereby release and discharge the NFL Entities, their employees, agents, successors, licensees, and assigns from any and all claims I might have in connection with the NFL Entities’ use, display, dissemination, or exploitation of the Images, including, but not limited to, any claims for defamation; violation of any moral or artist rights; and/or any right of privacy or publicity. I acknowledge that, as between me and the NFL Entities, the NFL Entities are the sole and exclusive owners of all right, title, and interest in all copyrights, trademark rights, and any and all other intellectual property rights, worldwide, in the Images, and the individual components thereof and I shall take no action to challenge or object to the validity of such rights or the NFL Entities’ ownership or registration thereof.

## V. POLICIES RELATED TO HUMAN RESOURCES AND SECURITY

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

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

The NFL is committed to providing equal employment opportunities and a work environment in which all individuals are treated with respect and dignity. Each person has the right to work in a professional atmosphere free from harassment, including racial and sexual harassment. The NFL finds unacceptable and will not tolerate any form of discrimination or harassment based on ancestry, race (including traits historically associated with race, including, but not limited to, hair texture and protective hairstyles), color, religion, sex (including pregnancy, childbirth, breastfeeding and/or related medical conditions), gender, gender identity, gender expression, national origin, age, disability, medical condition (including cancer and genetic characteristics), marital status, military or veteran status, genetic information, sexual orientation, or other status protected by applicable federal, state, or local law. This Policy extends to the workplace, all work-related settings, and NFL-sponsored events.

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

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

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

The NFL deals with labor organizations such as the NFL Players Association and NFL Referees Association. Under United States law, it is illegal for the NFL or an NFL employee to pay to or receive from any labor organization that represents NFL or Club employees, or any official of such labor organization, any money or other thing of value.

If you have any questions, please contact Human Resources or the NFL Management Council.

C. Controlled Substances and Illegal Drugs (Security)

The NFL promotes a drug-free workplace for all NFL employees and considers drug abuse to be a potential safety and security problem. The unlawful manufacture, distribution, possession, or use of a controlled substance or an illegal drug, including but not limited to while at an NFL facility or while conducting NFL business, is prohibited. Violations of this Policy will result in disciplinary action, up to and including termination of employment, and may have legal consequences.

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

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

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

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

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

## E. Personal Conduct Policy

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