NIKE, INC. POLICY ON PUBLIC POLICY AND POLITICAL ACTIVITIES

Overview

NIKE, Inc.’s mission is to bring inspiration and innovation to every athlete in the world and we take an inclusive approach to include all athletes – if you have a body, you’re an athlete. This commitment extends to our Company’s participation in public policy discourse and in the political process. As public policy decisions can affect our business, we believe we have a responsibility to our shareholders, employees, consumers, business partners and stakeholders to address policy areas that may impact our company. In order to advocate for public policies that support our Company’s objectives, we focus on educating policy makers on our business and business interests and, as permitted by law and deemed appropriate by management, we contribute to candidates for public office, related organizations, ballot initiatives and industry associations. Our engagement in public policy and political activities are conducted in compliance with all applicable laws and reporting requirements, as well as this Policy which has been reviewed and approved by the NIKE, Inc. Board of Directors.

Applicability

This revised Policy on Public Policy and Political Activities (the “Policy”) governs public policy statements, lobbying activities, corporate political contributions and industry association engagement by NIKE, Inc. and its majority-owned subsidiaries (the “Company”). Unless otherwise noted, this Policy applies in the U.S. and globally. This revised policy is effective as of January 1, 2022.

Engagement with Government Representatives

Company employees must promptly engage and consult the NIKE, Inc. Government and Public Affairs department (“GPA”) or the Legal department on matters involving multilateral, federal, state or local governments, as well as their respective agencies. Only Company officers and those selected by GPA or the Legal department may express the Company’s views on public policy, legislation, ballot initiatives, regulations or government action. Other employees may communicate the Company’s views only with specific guidance from GPA. Only GPA or the Legal department may hire lobbyists to advance business interests.

Political Activities of Employees

While Company employees may participate as individual citizens in the political process, decisions to do so are entirely personal, voluntary and on their own time. Employees engaging in political campaign activities are expected to do so as private citizens and must at all times make clear that their views and actions are their own, and not those of the Company. Employees must not use their position with the Company to pressure other employees to make contributions to or support or oppose any political candidates, elections or ballot initiatives. In
advance of formally seeking, or being considered for appointment to, government or public office, whether compensated or not, employees must notify the GPA team and the Ethics & Compliance Office. Any political solicitations by a NIKE, Inc. employee to fellow employees must be done on one’s own private time, outside of the Company. Finally, employees engaging in political activities must also adhere to the applicable provisions of the Company’s code of conduct, *Inside the Lines*.

**Corporate Political Contributions, Industry Associations and Public Policy Statements**

Public policy issues have the potential to impact the Company’s business, its shareholders, employees, consumers, business partners, stakeholders and the communities it serves. As part of our engagement in public policy and the political process, the Company may determine that it is appropriate and in the Company’s best interests to make political contributions to candidates for public office, political organizations or ballot initiatives; contribute or pay membership fees to business and industry associations and coalitions that are engaged in political activity (“Industry Associations”); and approve government or public policy statements (“Policy Statements”) of organizations with political or social objectives.

The Company’s Board of Directors has adopted this revised Policy to ensure that political contributions, industry association expenditures and public policy statements are made to promote business objectives and enhance shareholder value, and that they are made in a manner consistent with the Company’s values without regard to the private political preferences of company officers and executives. The use of any Company funds for political activity must adhere to this Policy and its approval guidelines.

**Political Contribution Approval Guidelines**

Any political contribution or industry association expenditure made by the Company must be approved in advance by the relevant GPA geographic leader, as well as the GPA global vice president. Such contributions or expenditures must promote the business interests and objectives of the Company. Further, the relevant GPA geographic leader and GPA global vice president shall consult with the Company’s legal counsel, compliance personnel and members of management as appropriate.

In addition, any political contribution to a candidate, political organization or ballot initiative in excess of USD $25,000 in a calendar year requires the additional approval of the NIKE, Inc. General Counsel and the business leader of the geography in which the contribution will be made.

In addition to this Policy, any and all political contributions must also comply with Company’s code of ethics, the Foreign Corrupt Practices Act and all other applicable laws and regulations in the jurisdictions in which the contributions will be made.
Lobbying Oversight
The Company may from time to time directly engage external registered lobbyists to assist the Company in monitoring governmental policy development, advising the Company or communicating the Company’s positions on various public policy and political issues that concern the business interests of the Company. Only GPA or the Legal department may engage external registered lobbyists or firms who advise on governmental affairs issues, with the approval of the relevant geographic GPA leader and the GPA global vice president. The Company will make all required public disclosures regarding lobbying activity.

Industry Association Approval Guidelines
Membership fees or contributions to an industry association that will aggregate to more than USD $25,000 in a calendar year must be approved in advance by the relevant GPA geographic leader and the GPA global vice president. Engagements with industry associations must support business objectives that GPA determines are beneficial to Company and its priorities. Our engagement with industry associations is focused on specific Company interests and we acknowledge that any group’s agenda may not align with ours in all policy areas. Therefore, our engagement with a particular group does not and should not imply our endorsement of all the policy positions of that particular group.

Policy Statements Guidelines
Any statement expressing a Company position on a matter of public policy or political activity must be approved in advance by GPA and must support objectives that GPA determines are beneficial to business interests. Further, the relevant GPA geographic leader and GPA global vice president shall consult with the Company’s legal counsel, compliance personnel and members of management as appropriate.

Federal Elections
The Company will not make political contributions related to a U.S. federal election, including candidates, political parties or political action committees.

NIKE Political Action Committee
Any contributions by the NIKE Political Action Committee shall comply with all applicable laws, including required disclosures, and shall be approved by the board of directors of the Committee. The NIKE Political Action Committee is a voluntary organization where Company employees may participate.

Board Oversight
Management will report annually to the Corporate Responsibility, Sustainability & Governance Committee of the Board of Directors of NIKE, Inc. regarding the Company’s compliance with this Policy.

All political contributions made by the Company to political candidates, political organizations or ballot initiatives will be reported to, and reviewed by, the Corporate Responsibility,
Sustainability & Governance Committee. Any membership fees or contributions to an industry association that aggregate to more than USD $25,000 in a calendar year will also be reported to, and reviewed by, the Committee. Any policy statements that make commitments regarding matters that involve Board responsibilities or that involve public reporting must be reviewed by the Corporate Responsibility, Sustainability & Governance Committee.

Disclosure

The Company shall at all times comply with all current applicable laws and regulations relating to corporate political contributions. On an annual basis, the Company will publish on its website all cash political contributions to candidates, political organizations or ballot initiatives. Similarly, in-kind or product donations that aggregate to more than USD $25,000 in retail value in a calendar year to candidates, political organizations or ballot initiatives will also be reported.

The Company will publish membership fees or contributions to any industry association that aggregate to more than USD $25,000 in a calendar year. NIKE, Inc. will also make a reasonable effort to obtain annually from those industry associations where membership fees and contributions aggregate to more than USD $25,000 in a calendar year the portion of said expenditures used for lobbying expenditures or political contributions. This information will also be published on the Company’s website.

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Amendments to the Policy

Amendments to the Policy must be approved by the Board of Directors.

Effective January 1, 2022