



# CODE OF BUSINESS CONDUCT AND ETHICS

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**AT FANATICS, WE PERFORM OUR WORK WITH INTEGRITY AND PROFESSIONALISM. OUR EMPLOYEES WORK IN A SAFE, RESPECTFUL, AND FAIR WORKPLACE. WE CREATE QUALITY PRODUCTS AND SERVICES THAT SEEK TO WOW OUR FANS.**



Team Fanatics,

Integrity, discipline, and professionalism are the hallmarks of great companies. As our operations expand, as we onboard more colleagues and as our roster of partners multiply, we correspondingly need an unwavering attention to detail in our practices, policies, and standards. As an industry leader we must continue to raise the bar, strive to be even better than our best and acknowledge that what has gotten us to this spot will only be a part of what is needed to continue our trajectory. We therefore need to be ever more vigilant and ever more focused. As a result, over the last several months you have no doubt witnessed a focus on operational excellence across all our support and administrative functions and that continues with this Code of Business Conduct and Ethics.

Over the past decade, Fanatics has evolved from a North American e-commerce and merchandise company to a global digital sports platform that has become one of the world's fastest growing and most exciting businesses. It is more important than ever to stay true to who we are, and know what we stand for, as a company. We strive to be world class in all our operations and strongly believe in doing business the right way. Fanatics is committed to working each day to deliver an unrivaled fan experience and best-in-class products across our global digital sports platform; to create an inclusive and diverse work environment focused on the safety and well-being of our employees; to deliver for our hundreds of professional and collegiate sports properties; and to align our Company's goals with environmental, social and governance issues where we can have the biggest influence.

We each make decisions daily that affect Fanatics as a company. That's why this Code of Business Conduct and Ethics is so important. It provides the basic legal framework and essential behaviors that help us make the right decisions and ensure we're conducting ourselves ethically and in compliance with the law, our policies, and our values. Your choices have significant impact on our reputation so please read and apply our Code of Business Conduct and Ethics, making sure your actions show respect for and earn the trust of our stakeholders, including fans, partners, community, employees, and investors. While this document may be a bit long it can be summarized with one concept. It is what I call the "Wall Street Journal Test." If your actions, behaviors, decisions were described in detail on the front page of the Wall Street Journal, would you be proud of the story and send it to family and friends?

Remember that in your business interactions, you are Fanatics and if there is one thing to remember it is: do the right thing, always.

**GLENN H. SCHIFFMAN**

Executive Vice President & Chief Financial Officer  
Fanatics Holdings, Inc.



Employees are expected to report actual or suspected non-compliance with this Code of Business Conduct and Ethics, or red flags or indications that non-compliance has occurred or is likely to occur. Please call the Company's Compliance Helpline (833-999-7327) at any time, and for any reason. Reports can be made anonymously. Fanatics will never allow any form of retaliation for making a report. You may also file a report through other means, as detailed in this Code of Business Conduct and Ethics.

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# 1 INTRODUCTION

## 1.1 PURPOSE AND SCOPE

This Code of Business Conduct and Ethics (this “Code”) contains general guidelines for conducting the business of Fanatics Holdings, Inc. (“Fanatics”) and Fanatics’ wholly and majority-owned subsidiaries (collectively, with Fanatics, “we,” “us,” “our,” or the “Company”) consistent with the highest standards of business ethics. To the extent this Code requires a higher standard than required by commercial practice or applicable laws, rules, or regulations, the Company adheres to these higher standards.

This Code applies to all of the Company’s directors, officers, and other employees. We refer to all officers and other employees covered by this Code as “Company employees” or simply “employees,” unless the context otherwise requires. In this Code, we refer to Fanatics’ principal executive officer, principal financial officer, principal accounting officer, and controller, or persons performing similar functions, as Fanatics’ “principal financial officers.”

## 1.2 SEEKING HELP AND INFORMATION

This Code is not intended to be a comprehensive rulebook and cannot address every situation that you may face. If you feel uncomfortable about a situation or have any doubts about whether it is consistent with the Company’s ethical standards, seek help. We encourage you to contact your manager for help first. If your manager cannot answer your question or if you do not feel comfortable contacting your manager, contact Fanatics’ Chief of Corporate and Governance Affairs or Chief People Officer or, alternatively, any member of Fanatics’ Legal or Human Resources Departments.

### BEFORE TAKING AN ACTION, ASK YOURSELF

- Is it legal?
- Does it comply with the Code?
- Does it reflect our Company values and ethics?
- Does it respect the rights of others?
- Could it damage the reputation of the Company?
- Would I be embarrassed to read about it in the media?

If you are unsure or the answer is “yes,” please reach out to your manager, the Chief of Corporate and Governance Affairs or the Chief People Officer or, alternatively, any member of Fanatics’ Legal or Human Resources Departments.



## 2 CODE ADMINISTRATION

Although everyone at the Company is expected to comply with this Code, Fanatics' Chief of Corporate and Governance Affairs (the "Policy Owner") is responsible for the implementation and enforcement of this Code. The Policy Owner may assign one or more individuals within the Company with responsibility for this Code in their respective

operations. Any exception to this Code for Fanatics' directors, executive officers, or other principal financial officers must be approved by Fanatics' Board of Directors. Exceptions to this Code for other employees must be approved by the Policy Owner (or, if the activity involves the Policy Owner, Fanatics' Chief Financial Officer).

## 3 CONFLICTS OF INTEREST

### 3.1 IDENTIFYING POTENTIAL CONFLICTS OF INTEREST

Employees and directors must act in the best interests of the Company. You must refrain from engaging in any activity or having a personal interest that presents a "conflict of interest" and should seek to avoid even the appearance of a conflict of interest. A conflict of interest occurs when your personal interest interferes with the interests of the Company. A conflict of interest can arise whenever you, as an employee, or director, take action or have an interest that prevents you from performing your Company duties and responsibilities honestly, objectively, and effectively.

Identifying potential conflicts of interest may not always be clear-cut. The following situations might reasonably be expected to give rise to a conflict of interest and should be identified to, and addressed by the Policy Owner, or, as appropriate, Fanatics' Board of Directors:

- **Outside Employment.** An employee being employed by, serving as a director of, or providing any services to a company that the individual knows or suspects is a material customer, supplier, or competitor of the Company (other than services to be provided as part of an employee's job responsibilities for the Company).
- **Improper Personal Benefits.** An employee or director obtaining any material (as to such employee or director) personal benefits or favors because of their position with the Company. See Section 7 for additional guidance regarding gifts and entertainment.
- **Financial Interests.** An employee having a "material interest" (ownership or otherwise) in any company that the individual knows or suspects is a material customer, supplier, or competitor of the Company and using their position to influence a transaction with such company. Whether an employee has a "material interest" will be determined by the Policy Owner in light of all of the circumstances, including consideration of the relationship of the employee to the customer, supplier, or competitor; the relationship of the employee to the specific transaction; and the importance of the interest to the employee having the interest.
- **Loans or Other Financial Transactions.** An employee or director obtaining loans or guarantees of personal obligations from, or entering into any other personal financial transaction with, any company that the individual knows or suspects is a material customer, supplier, or competitor of the Company. This guideline does not prohibit arms-length transactions with banks, brokerage firms, or other financial institutions.
- **Service on Boards and Committees.** An employee

or director serving on a board of directors or trustees or on a committee of any entity (whether profit or not-for-profit) whose interests reasonably would be expected to conflict with those of the Company.

- **Actions of Family Members.** The actions of family members outside the workplace may also give rise to the conflicts of interest described above because they may influence an employee's or director's objectivity in making decisions on behalf of the Company. For purposes of this Code, "family members" include your spouse or life-partner, brothers, sisters, parents, in-laws, and children, whether such relationships are by blood or adoption.

### 3.2 DISCLOSURE OF CONFLICTS OF INTEREST

The Company requires that employees and directors disclose any situation that reasonably would be expected to give rise to a conflict of interest. If you suspect that you have a situation that could give rise to a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it in writing to your manager or the Policy Owner, or if you are a director, executive officer, or other principal financial officer, to Fanatics' Board of Directors. The Policy Owner will work with you to determine whether you have a conflict of interest and, if so, how best to address it. All transactions that could give rise to a conflict of interest involving a director, executive officer, or principal financial officer must be approved by Fanatics' Board of Directors, and any such approval will not be considered a waiver of or exception to this Code.

## 4 CORPORATE OPPORTUNITIES

As an employee or director of the Company, you have an obligation to advance the Company's interests when the opportunity to do so arises. If you discover or are presented with a business opportunity through the use of corporate property or information or because of your position with the Company, you should first present the business opportunity to the Company before pursuing the opportunity in your individual capacity. No employee or director may use corporate property, information, or their position with the Company for personal gain while employed by the Company or, for a director, while serving on Fanatics' Board of Directors.

You should disclose to your manager the terms and conditions of each business opportunity covered by this Code that you wish to pursue. Your manager will contact the Policy Owner and the appropriate management personnel to determine whether the Company wishes to pursue the business opportunity. If the Company waives its right to pursue the business opportunity, you may pursue the business opportunity on the same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Code.

## 5 CONFIDENTIAL INFORMATION

Employees and directors have access to a variety of confidential information regarding the Company. Confidential information includes all non-public information, including information about the Company's financial and business performance, that might be of use to competitors, or, if disclosed, harmful to the Company or its collaborators, customers, or suppliers. Employees and directors have a duty to safeguard all confidential information of the Company and that of third parties with which the Company conducts business, except when disclosure is authorized by the Company or legally mandated. Unauthorized disclosure of any confidential information is prohibited. Additionally, employees and directors should take appropriate precautions to ensure that confidential or sensitive business

information, whether it is proprietary to the Company or another company, is not communicated within the Company except to employees and directors who have a need to know such information to perform their responsibilities for the Company. An employee's and director's obligation to protect confidential information continues after they leave the Company. Unauthorized disclosure of confidential information could cause competitive harm to the Company or its collaborators, customers, or suppliers and could result in legal liability to you and the Company.

Any questions or concerns regarding whether disclosure of Company information is legally mandated should be promptly referred to the Policy Owner.

## 6 COMPETITION AND FAIR DEALING

All employees should endeavor to deal fairly with fellow employees and with the Company's collaborators, licensors, customers, suppliers, and competitors. Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. Employees should maintain

and protect any intellectual property licensed from licensors with the same care as they employ with regard to Company-developed intellectual property. Employees should also handle the nonpublic information of our collaborators, licensors, suppliers, and customers responsibly and in accordance with our agreements with them, including information regarding their technology and product pipelines.



## 7 GIFTS AND ENTERTAINMENT

The giving and receiving of gifts is a common business practice designed to build relationships and understanding among business partners, and the Company permits appropriate business gifts and entertainment. Gifts and entertainment, however, should not compromise, or appear to compromise, your ability to make objective and fair business decisions. Nor should such expenses be used as a bribe or improper quid pro quo related to our business. In addition to these expectations, the giving and receiving of gifts may be subject to a variety of laws, rules, and regulations – including rules that may apply to the organization of the intended recipient and our own policies with respect to such activities. For further guidance on gift giving rules and requirements, please see Fanatics Anti-Corruption Compliance Policy.

### EXAMPLES OF PROHIBITED GIFTS

- Gifts in the form of cash, gift cards, or gift certificates
- Gifts or hospitality for family members of public officials
- Gifts or hospitality unrelated to a business purpose
- Gifts to public officials worth more than a nominal value

## 8 COMPANY RECORDS

Accurate and reliable records are crucial to our business. Our records are the basis of our earnings statements, financial reports, regulatory submissions, and many other aspects of our business, and guide our business decision-making and strategic planning. Company records include financial records, personnel records, records relating to our technology and product development, customer collaborations, manufacturing and regulatory submissions, and all other records maintained in the ordinary course of our business.

All Company records must be complete, accurate, and reliable in all material respects. Each employee and director must follow any formal document retention policy of the Company with respect to Company records within such employee's or director's control. Please contact the Policy Owner to obtain a copy of any such policy or with any questions concerning any such policy.

## 9 PROTECTION AND USE OF COMPANY ASSETS

Employees and directors should protect the Company's assets and ensure their efficient use for legitimate business purposes only and not for any personal benefit or the personal benefit of anyone else. Theft, carelessness, and waste have a direct impact on the Company's financial performance. The use of Company funds or assets, whether or not for personal gain, for any unlawful or improper purpose is prohibited.

Employees and directors should be aware that Company property includes all data and

communications transmitted or received to or by, or contained in, the Company's electronic or telephonic systems. Company property also includes all written communications. Employees, directors, and other users of this property should have no expectation of privacy with respect to these communications and data. To the extent permitted by law, the Company has the ability, and reserves the right, to monitor all electronic and telephonic communication. These communications may also be subject to disclosure to law enforcement or government officials.

## 10 COMPLIANCE WITH LAWS AND REGULATIONS

Each employee and director has an obligation to comply with all laws, rules, and regulations applicable to the Company's operations. These include, without limitation, laws covering interactions with the government, political contributions, antitrust, insider trading, bribery and kickbacks, copyrights, trademarks and trade secrets, information privacy, illegal political contributions, antitrust prohibitions, foreign corrupt practices, offering or receiving gratuities, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information, or misuse of corporate assets. You are expected to understand and comply with all laws, rules and regulations that apply to your job position. If any doubt exists about whether a course of action is lawful, you should seek advice from your manager or the Policy Owner.

### 10.1 INTERACTIONS WITH THE GOVERNMENT

The Company is committed to ensuring that all dealings with governments and their representatives are conducted with the highest standards of business ethics and compliance with all applicable laws and regulations, including the special requirements that apply to communications with governmental bodies that may have regulatory authority over our products and operations. If your job responsibilities include interacting with the government, you are expected to

understand and comply with the special laws, rules, and regulations that apply to your job position as well as with any applicable standard operating procedures that the Company has implemented. If any doubt exists about whether a course of action is lawful, you should seek advice immediately from your manager and the Policy Owner. Fanatics' Anti-Corruption Compliance Policy also provides additional guidance regarding dealings with government officials.

In addition to the above, you must obtain approval from the Policy Owner for any work activity that requires communication with any member or employee of a legislative body or with any government official or employee. Work activities covered by this policy include meetings with legislators or members of their staff or with senior executive branch officials on behalf of the Company (whether these interactions involve Company employees and directors, or are conducted via one of our agents or third parties). Preparation, research, and other background activities that are done in support of lobbying communication also require approval, even if a communication ultimately is not made. If any doubt exists about whether a given work activity would be considered covered by this provision, you should seek advice immediately from your manager and the Policy Owner.

## 10.2 POLITICAL CONTRIBUTIONS

As a Company we do not engage in political activity, including lobbying or campaign contributions, using Company funds, facilities, or in-kind gifts. Exceptions to this rule must be approved in advance by the Policy Owner, and contributions must be made in accordance with applicable law. Employees and directors must also comply with any other Company policies related to political activity that may apply. The Company encourages its employees and directors to participate in the political process as individuals and on their own time. The Company will not reimburse you for personal political contributions. When you participate in non-Company political affairs, you should be careful to make it clear that your views and actions are your own, and not made on behalf of the Company. Please contact the Policy Owner if you have any questions concerning Company policies regarding political contributions.

## 10.3 COMPLIANCE WITH ANTITRUST LAWS

Antitrust laws of the United States and other countries are designed to protect consumers and competitors against unfair business practices and to promote and preserve competition. Our policy is to compete vigorously and ethically while complying with all antitrust, monopoly, competition, or cartel laws in all countries, states, or localities in which the Company conducts business. Violations of antitrust laws may result in severe penalties against the Company and its employees and directors, including potentially substantial fines and criminal sanctions. Please contact the Policy Owner if you have any questions concerning Company policies regarding compliance with antitrust laws.

### 10.3.1 MEETINGS WITH COMPETITORS; PROFESSIONAL ORGANIZATIONS AND TRADE ASSOCIATIONS

In the ordinary course of the Company's business, employees of the Company may collaborate and meet with companies engaged in competing lines of business or companies that could be deemed competitors of the Company. Employees may also attend meetings of professional organizations and trade associations at which competitors are present. Employees should exercise caution in this context, recognizing the potential for the appearance of

## EXAMPLES OF GOVERNMENT REPRESENTATIVES

- Athletic director at a state-owned university
- Coach of a national team
- Local health inspector
- Customs officials
- Tax or financial regulator
- Manager of a team owned by a sovereign wealth fund
- Journalist at state-run media

impropriety. At such meetings, you should not discuss the Company's pricing policies or other competitive terms or any other proprietary, competitively sensitive information.

## 10.4 COMPLIANCE WITH INSIDER TRADING LAWS

Employees and directors are responsible for complying with all applicable laws and regulations regarding insider trading. Accordingly, no employee or director shall purchase or sell any type of security while in possession of material, nonpublic information relating to the security or its issuer, whether the issuer of the security is the Company or any other company, or "tip" or "suggest" that anyone else buy or sell securities of any company on the basis of material nonpublic information. For example, if a director or employee learns material nonpublic information about another company with which the Company does business, including a business partner, that person may not trade in such company's securities until the information becomes public or is no longer material. In addition, no employee or director shall purchase or sell any security of any other company, including another company in the Company's industry, on the basis of material non-public information obtained in the course of their employment or service with the Company.

Violation of insider trading laws can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including, for an employee, termination of employment or, for a director, a request that such director resign from Fanatics' Board of Directors. Please contact the Policy Owner if you have any questions concerning Company policies regarding compliance with insider trading laws.

## 11 ANTI-CORRUPTION COMPLIANCE AND THE UNITED STATES FOREIGN CORRUPT PRACTICES ACT

The Company is committed to complying with the United States Foreign Corrupt Practices Act (the “FCPA”), the United Kingdom Bribery Act, Japan’s Unfair Competition Prevention Act, and all other applicable anti-corruption laws in the countries where we do business. The Company prohibits its employees, directors, and agents from corruptly offering, giving, authorizing, or promising money or anything of value (such as cash or cash equivalents, NFTs, gifts, travel expenses, use of corporate/private aircraft, entertainment, hospitality, charitable or political donations, jobs or internships, discounts or favorable pricing, or any other benefits of any size or value), directly or indirectly, to win or retain business, to secure an improper business advantage, or to influence any act or decision of any government official or employee of a state-owned or controlled entity, political party, candidate for political office, or official of a public international organization. The Company also prohibits employees, directors, officers, and agents acting on behalf of the Company from requesting or receiving bribes, kickbacks, or other improper inducements in any way related to the Company’s business. The use of agents or third parties for the payment of bribes, kickbacks, or other inducements is expressly prohibited, as is the use of personal funds to engage in corrupt conduct otherwise prohibited by this Code. Violations of the FCPA and other applicable anti-corruption laws can result in severe fines, criminal sanctions, and other collateral consequences. Non-compliance by Company personnel could result in disciplinary action by the Company, up to and including, for an employee, termination of employment or, for a director, a request that such director resign from Fanatics’ Board of Directors. The Company will also take appropriate action against any agent or third party who violates these standards. For further guidance, please see Fanatics’ Anti-Corruption Compliance Policy.

### EXAMPLES OF ANYTHING OF VALUE

- FanCash or eGift cards
- Company-branded swag
- Game tickets
- Player autographs, trading cards, jerseys, or memorabilia
- Sports betting or gambling free-play or bonuses
- Fan experiences, Fanatics Live events, player meetings

### EXAMPLES OF IMPROPER ADVANTAGES FOR THE COMPANY

- Securing a building license for a flagship store
- Importing goods at a lower tariff rate
- Securing a contract with a national team
- Obtaining a permit for a filming location
- Renewing naming rights at a multi-purpose arena



## 12 INTERNATIONAL TRADE LAWS

Company employees and agents must know and comply with United States trade control laws and regulations (including export controls, sanctions, customs, and anti-boycott), as well as the trade control laws of other countries where the Company operates.

United States laws and regulations also impose various trade sanctions or embargoes prohibiting exports, transactions, and other dealings with certain countries, territories and persons, and prohibit cooperation with certain boycotts imposed by some countries against others. The Company does not engage in unauthorized dealings with sanctioned countries or parties, nor does it participate in prohibited boycotts. Employees involved in export transactions or international operations must

familiarize themselves with the list of countries against which the United States maintains comprehensive sanctions and the rules relating to exporting to or transacting with such countries, either directly or indirectly through foreign subsidiaries or other third parties. Due to the complexities of these international trade laws, employees should contact the Policy Owner before engaging in transactions with countries or persons that may be affected by economic or trade sanctions. If requested to participate in or cooperate with an international boycott that the United States does not support (e.g., the boycott of Israel sponsored by the Arab League), you may not agree to or comply with such request. Immediately report this request to the Policy Owner. For further guidance, please see Fanatics' Trade Controls Compliance Policy.

## 13 ENVIRONMENT, HEALTH AND SAFETY

The Company is committed to providing a safe and healthy working environment for its employees and to avoiding adverse impact and injury to the environment and the communities in which it does business. Company employees must comply with all applicable environmental, health and safety laws, regulations, and Company standards. It is your responsibility to understand and comply with the laws, regulations, and policies that are relevant to your job. Failure to comply with environmental, health and safety laws and regulations can result in civil and criminal liability against you and the Company, as well as disciplinary action by the Company, up to and including termination of employment. You should contact the Policy Owner if you have any questions about the laws, regulations, and policies that apply to you.

### 13.1 ENVIRONMENT

All Company employees should strive to conserve resources and reduce waste and emissions through recycling and other energy conservation measures. You have a responsibility to promptly report any

known or suspected violations of environmental laws or any events that may result in a discharge or emission of hazardous materials.

### 13.2 HEALTH AND SAFETY

The Company is committed not only to complying with all relevant health and safety laws, but also to conducting business in a manner that protects the safety of its employees. All employees are required to comply with all applicable health and safety laws, regulations, and policies relevant to their positions. If you have a concern about unsafe conditions or tasks that present a risk of injury to you, please report these concerns immediately to your manager, the Policy Owner or Fanatics' Chief People Officer.

### 13.3 EMPLOYMENT PRACTICES

The Company pursues fair employment practices in every aspect of our business. The following is only intended to be a summary of certain of our employment policies and procedures.

The Company respects human rights and is committed to ensuring that the Company's partners and suppliers do not rely on forced, compulsory, or child labor in any way related to the Company's activities. As part of that commitment to human rights, the Company expects its suppliers to comply with local laws related to work hours, child labor, and work environments, and strictly prohibits human trafficking in any way related to the Company's business. It also is the Company's expectation that its partners, vendors, and suppliers comply with these standards and with the Company's other applicable policies, including any supplier code of conduct that the Company may have in place from time to time.

Company employees and directors must comply with all applicable labor and employment laws, including anti-discrimination laws and laws related to freedom of association and privacy. It is your responsibility to understand and comply with the laws, regulations, and policies that are relevant to your job. Failure to comply with labor and employment laws can result in civil and criminal liability against you and the Company, as well as disciplinary action by the Company, up to and including termination of employment or, for a director, a request that such director resign from Fanatics' Board of Directors. You should contact your manager, the Policy Owner or Fanatics' Chief People Officer if you have any questions about the laws, regulations, and policies that apply to you.

### **13.4 HARASSMENT AND DISCRIMINATION**

The Company is committed to providing equal opportunity and fair treatment to all individuals on the basis of merit, without discrimination because of race, color, religion, national origin, sex (including pregnancy, childbirth and related medical conditions), sexual orientation, age, disability, veteran status, or other characteristic protected by law. The Company also prohibits harassment based on these characteristics in any form, whether physical or verbal and whether committed by managers, non-supervisory personnel, or non-employees. Harassment may include, but is not limited to, offensive sexual flirtations, unwanted sexual advances or propositions, verbal abuse, sexually or racially degrading words, or the display in the workplace of sexually suggestive or racially degrading objects or pictures.

If you have any complaints about discrimination or harassment, report such conduct to your manager or to the Policy Owner or Fanatics' Chief People Officer. All complaints will be treated with sensitivity and discretion. Your manager, the Policy Owner, Fanatics' Chief People Officer and the Company will protect your confidentiality to the extent possible, consistent with law and the Company's need to investigate your concern. Where our investigation uncovers harassment or discrimination, we will take prompt corrective action, which may include disciplinary action by the Company, up to and including, termination of employment or, for a director, a request that such director resign from Fanatics' Board of Directors. The Company strictly prohibits retaliation against an employee who, in good faith, files a complaint.

Any member of management who has reason to believe that an employee or director has been the victim of harassment or discrimination or who receives a report of alleged harassment or discrimination is required to report it to the Policy Owner or Fanatics' Chief People Officer immediately.

### **13.5 DRUGS AND ALCOHOL**

The Company is committed to maintaining a drug-free workplace. All Company employees must comply strictly with Company policies regarding the possession, sale, and use of illegal drugs and marijuana. Possessing, using, selling, or offering illegal drugs, marijuana, and other controlled substances is prohibited under all circumstances while on duty or on the premises of the Company.

In general, the Company allows alcohol in its offices for consumption at employee social gatherings and Company-sponsored events. Some offices in certain jurisdictions may have other policies. As a responsible employer, the safety, security, and welfare of our colleagues and others is the Company's top priority. Moderate alcohol consumption on Company property or while conducting Company business off-site, such as at a business dinner, may be permitted, but you are expected to show good judgment at all times in connection with alcohol consumption. Abusing alcohol or drinking alcohol to the point of impairment is strictly prohibited under all circumstances while on duty or on Company premises. The Company will not tolerate drinking in a way that leads to inappropriate behavior, endangers the safety of others, or violates the law.

Employees should take care to make sure people who don't or can't consume alcohol feel included and welcome to participate in social gatherings and Company-sponsored events.

All Company employees are prohibited from reporting for work, or driving a Company vehicle or any vehicle on Company business, while under the influence of any illegal drug, marijuana, controlled substance, or alcohol.

### **13.6 VIOLENCE PREVENTION AND WEAPONS**

The safety and security of Company employees are vitally important. The Company will not tolerate violence or threats of violence in, or related to, the workplace. If you experience, witness, or otherwise become aware of a violent or potentially violent situation that occurs on the Company's property or affects the Company's business, you must immediately report the situation to your manager, the Policy Owner or Fanatics' Chief People Officer.

The Company does not permit any individual to have weapons of any kind on Company property or in vehicles, while on the job or off-site while on Company business, except to the extent this prohibition would conflict with applicable laws or regulations. This is true even if you have obtained legal permits to carry weapons. The only exception to this policy applies to security personnel who are specifically authorized by Company management to carry weapons.

### **13.7 PERSONAL CONDUCT AND SOCIAL MEDIA**

Company employees should take care when presenting themselves in public settings, as well as online and in web-based forums or networking sites. Employees are encouraged to conduct themselves in a responsible, respectful, and honest manner at all times. The Company understands that employees may wish to create and maintain a personal presence online using various forms of social media. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established Fanatics' Social Media Policy, which contains guidelines for appropriate use of social media. Please see Fanatics' Social Media Policy for additional information.

### **13.8 PUBLIC COMMUNICATIONS**

Absent prior approval, the only persons authorized to speak on behalf of the Company to third parties, including, but not limited to, the press, the media, securityholders, analysts, or the investment community are those designated by Fanatics' Communications Team and/or Fanatics' Investor Relations Team. Inquiries from third parties should be forwarded to Fanatics' Communications Team and/or Fanatics' Investor Relations Team. Under no circumstances should unauthorized persons respond to third-party inquiries without prior authorization from Fanatics' Communications Team and/or Fanatics' Investor Relations Team.

## 14 POLICIES AND PROCEDURES REGARDING ACCOUNTING, INTERNAL ACCOUNTING CONTROLS, FRAUD, OR AUDITING MATTERS

The Company is committed to maintaining its books and records in compliance with all applicable laws, rules, and regulations. The Company encourages employees, directors and third-party vendors, customers, and business partners to make us aware of any practices, procedures or circumstances that raise concerns about the integrity of our financial statements, books, and records.

All employees, directors, and third parties making reports are asked to report complaints about accounting, internal accounting controls, auditing matters, or questionable financial practices (“Accounting Complaints”) to the Company’s Compliance Helpline (see Section 16). You may

remain anonymous and will not be required to reveal your identity in a telephone call to the Company’s Compliance Helpline, although providing your identity may assist the Company in investigating your concern. Employees, directors, and third parties are encouraged to provide as much detail and supporting information as possible about their concerns in order to assist the investigative process.

It is the policy of the Company to treat Accounting Complaints seriously and expeditiously. Accounting Complaints will be reviewed by the Audit Committee of Fanatics’ Board of Directors (the “Audit Committee”) with the oversight of the Policy Owner or such other persons as the Audit Committee determines to be appropriate.

## 15 NON-COMPLIANCE AND INVESTIGATIONS

The Company takes compliance with applicable laws and regulations and this Code seriously and will conduct appropriate investigations of credible allegations of non-compliance. The Company will timely investigate all legitimate complaints reported under this Code.

If you are accused of violating this Code, you will be given an opportunity to present your version of the events at issue prior to any determination of appropriate discipline. In all cases, consistent with local law and agreement terms, disciplinary

action may include, for an employee, termination of employment or, for a director, a request that such director resign from Fanatics’ Board of Directors. Employees and directors who violate the law or this Code may expose themselves to substantial civil damages, criminal fines, and prison terms. The Company may also face substantial fines and penalties and may incur damage to its reputation and standing in the community. Your conduct as a representative of the Company, if it does not comply with the law or with this Code, can result in serious consequences for both you and the Company.



## 16 REPORTING QUESTIONS OR CONCERNS

Employees should not hesitate to raise questions about this Code or applicable laws and regulations to their managers, the Policy Owner or Fanatics' Chief People Officer or, alternatively, to any member of Fanatics' Legal or Human Resources Departments. Fanatics' Legal and Human Resources Departments will support anyone who raises genuine concerns in good faith or asks questions regarding this Code regardless of their position within the Company.

Employees are expected to report actual or suspected non-compliance with this Code, or red flags or indications that non-compliance has occurred or is likely to occur. Employees who are aware of actual or suspected non-compliance but fail to report such violations will be subject to appropriate disciplinary action which may include, for an employee, termination of employment or, for a director, a request that such director resign from Fanatics' Board of Directors.

The Company will not tolerate any form of retaliation against any person who has raised an ethical or legal concern in good faith. This applies even if your report does not turn out to be an actual violation. Retaliation is strictly prohibited and can result in discipline. The Company will endeavor to protect the identity of reporting persons to the extent feasible.

### REPORTING POINTS OF CONTACT

- Your manager
- The Policy Owner (Fanatics' Chief of Corporate Governance and Affairs)
- Fanatics' Chief People Officer
- Fanatics' Legal Department
- Fanatics' Human Resources Department
- Company's Compliance Helpline (anonymous reporting available)

Reports may be submitted through the Company's Compliance Helpline, which is administered by Navex Services. Reports can be made anonymously as follows:

- Website: <https://fanatics.ethicspoint.com>
- Toll-Free Telephone: 833-999-7327
- Mobile intake site  
URL: [fanaticsmobile.ethicspoint.com](https://fanaticsmobile.ethicspoint.com) or scan the QR code below



- Toll-Free Telephone (from an outside line, dial direct for your country):

COUNTRY	PHONE NUMBER
Belgium	0800 12 696
Brazil	0800 729 2313
Canada	833-996-3923
France	0 800 90 31 85
Germany	0800 1814418
Honduras	2217-0416
Hong Kong	800901257
India	0008000 503705
Italy	800768401
Japan	0800-080-9419
Spain	900751047
Thailand	1800 018 104
United Kingdom & Northern Ireland	0808 169 6525
United States	833-999-7327
Vietnam	024 4458 1731

## 17 CONCLUSION

This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Company policy. The Company reserves the right to amend, supplement, or discontinue this Code and the matters addressed herein, without prior notice, at any time.

Effective Date: September 2022





**Fanatics**