

GameStop

CONFLICT MINERALS POLICY

Similar to the issue of conflict diamonds or blood diamonds, there has been increased awareness about conflict minerals that are mined in conditions of armed conflict and human rights abuses, notably in the Democratic Republic of the Congo (“DRC”) and its adjoining countries (together with the DRC, the “Covered Countries”). In an effort to further the humanitarian goal of ending such violence and abuse, in 2010 Congress enacted Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, and the Securities and Exchange Committee subsequently adopted reporting rules, requiring public companies engaged in manufacturing products or contracting for the manufacture of products to disclose whether the minerals used in their products are “conflict minerals” originating from the Covered Countries.

The term “conflict minerals” is defined as (A) columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Covered Countries. The conflict minerals are then refined into tantalum, tin, tungsten and gold, which are often referred to as “3TG”.

We, at GameStop Corp., including all members of our family of brands (collectively, “GameStop”) take our social responsibilities seriously and are committed to sourcing products from other companies that share our values regarding respect for human rights, integrity and environmental responsibility.

To meet our obligations under the conflict minerals legislation as well as to encourage social responsibility, we have generally adopted the following framework under the Organization for Economic Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the related supplements for gold and for tin, tantalum and tungsten (collectively, “OECD Guidance”) into our proper due diligence measures regarding our supply chain for products that we manufacture or contract for others to manufacture for us that could potentially contain any of the 3TG metals:

1. Establish strong company management systems;
2. Identify and assess risks in the supply chain;
3. Design and implement a strategy to respond to identified risks;
4. Carry out independent third party audits of smelters’/refiners’ sourcing; and
5. Report annually on supply chain due diligence.

GameStop does not directly source conflict minerals from mines, smelters or refiners, and is in most cases several levels removed from these market participants. Furthermore, given the complexity of the supply chain, we recognize we cannot successfully put this framework in place without the full cooperation of our manufacturers, vendors and suppliers. Accordingly, we are working with, and will continue to work with, our supply chain partners so that we can have greater confidence that our products are produced in ways that do not support the mining and use of conflict minerals in any of the Covered Countries. GameStop reserves the right to request from any supplier at any time such information, certifications, and documentation as it shall deem necessary to monitor or assess compliance with this policy.

GameStop files conflict minerals reports on Form SD with the Securities and Exchange Commission and such reports are made publicly available on GameStop’s website at <https://investor.gamestop.com/sec-filings>.

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