

# **Foot Locker, Inc. Conflict Minerals Policy**

## **Introduction**

Foot Locker, Inc. (the “Company”) is committed to maintaining a socially responsible supply chain and to sourcing components and materials from companies that share our values regarding human rights, ethics, and environmental responsibility. The Company strives to work with suppliers that conduct business responsibly and ethically.

## **SEC Conflict Minerals Rule**

As part of its commitment to responsible product sourcing, the Company works with our suppliers to help ensure compliance with the final rule (the Final Rule) of the U.S. Securities and Exchange Commission (SEC) regarding reporting and disclosure related to conflict minerals, as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. Conflict minerals are defined as tin, tantalum, tungsten and gold (commonly referred to as 3TG), regardless of where they are sourced, processed or sold (Conflict Minerals). The Final Rule requires SEC registrants whose manufactured products contain Conflict Minerals that are necessary to the functionality or production of their products to conduct a “country of origin inquiry” reasonably designed to determine whether the Conflict Minerals that are necessary to the functionality or production of the products that we manufactured or contracted to manufacture originated from the Democratic Republic of Congo or adjoining countries, and, if so, conduct due diligence on the source and chain of custody of the Conflict Minerals and provide necessary disclosures.

## **Conflict Minerals Procedures**

The Company has initiated a comprehensive process to comply with the Final Rule and implement related supply chain due diligence measures. In accordance with this Policy, the Company is specifically:

- using the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition, as the international framework for meeting the sourcing expectations of our customers, regulators and stakeholders;
- involved in strengthening its due diligence capabilities and processes to identify the source of Conflict Minerals, if any, used in the Company’s products;
- committed to improve, over time, the ability to track and trace any Conflict Minerals used in its supply chain; and
- contacting its suppliers to determine the country of origin of any Conflict Minerals used in its supply chain.

The Company must rely on the cooperation of its suppliers in the implementation of and adherence to this Policy in order to meet its SEC reporting obligations. Our expectations of suppliers include that suppliers provide a timely response to our queries about purchased components, that suppliers reach out to their suppliers to obtain Conflict Minerals supply chain information as requested by the Company, and that suppliers engage in regular communications with the Company about the supplier’s Conflict Minerals tracking and tracing efforts.

This Policy will be regularly reviewed and updated as needed.