

Foot Locker Conflict Minerals Policy

Our commitment

Foot Locker 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 use in Foot Locker products of “conflict minerals” from the Democratic Republic of Congo (DRC) or an adjoining country that finance armed conflict would be inconsistent with this commitment. Conflict minerals are defined as tin, tantalum, tungsten and gold (commonly referred to as 3T&G), regardless of where they are sourced, processed or sold (“Conflict Minerals”).

Conflict Minerals can make their way into the supply chains of various products used by consumers and businesses around the world. Foot Locker strives to use only materials in Foot Locker sourced products that do not finance armed conflict, and we will work within our supply chain to take steps to comply with the U.S. Conflict Minerals requirements.

Background on the final rule under Section 1502 of the Dodd-Frank Act

The U.S. Securities and Exchange Commission (SEC) has adopted a final rule to implement reporting and disclosure related to Conflict Minerals, as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rule requires manufacturers who are SEC filers to disclose whether the products they manufacture or contract to manufacture contain Conflict Minerals that are “necessary to the functionality or production” of those products.

Our Policy and efforts

Foot Locker has initiated a comprehensive process to comply with the rule and is taking steps to increase its supply chain due diligence measures as they relate to Conflict Minerals in its supply chain. In accordance with this Policy, Foot Locker is specifically:

- Using the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance 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 Foot Locker’s products.
- Committed to improve, over time, the ability to track and trace any Conflict Minerals used in its supply chain.
- Contacting its suppliers to determine the country of origin of any Conflict Minerals used in its supply chain.

Foot Locker 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 a timely response to our queries about purchased components, assistance in reaching out to their suppliers in case the source of minerals is not currently known, and regular communications with Foot Locker about the supplier’s Conflict Minerals tracking and tracing efforts.

Questions and comments

Foot Locker welcomes questions and comments regarding this Policy, or any concerns around the Conflict Minerals sourced by Foot Locker, all of which should be sent to:

Foot Locker, Inc.
Attn: General Counsel
330 West 34th Street, 4th Floor
New York, New York 10001

This Policy will be regularly reviewed and updated as needed.