

Modern Slavery Statement

2019/2020 Financial Year



Reporting Entity

Over the last 20 years EB Games has become one of Australia's leading retailers and has grown to more than 420 corporate stores across Australia and New Zealand under two brand names, EB Games and Zing Pop Culture.

In 2004 EB Games joined the GameStop group which operates more than 5,000 company stores across 10 countries.



COMPANY FACT SHEET

Entity	Electronics Boutique Australia Pty Limited ACN 077 681 442 ('EB Games')	
Ultimate Holding Company	GameStop Corp. (Publicly listed company on the New York Stock Exchange)	
Employees	+ 3,000	
Areas of Employment		
Distribution Centre /Warehouse	<ul style="list-style-type: none"> • Logistics • Import management • Refurbishment of second-hand goods • Picking and packing • Forklift and machinery operators 	
Store Support Centre (SSC)	<ul style="list-style-type: none"> • Customer service • Store support lines • Finance and Accounts • Property • Legal • Buying 	<ul style="list-style-type: none"> • Marketing/Social media • Website/eCommerce/ Development • Human Resources/Payroll • Loss Prevention • IT
Field Team	<ul style="list-style-type: none"> • Operations managers • Field managers • Store managers • Sales associates 	
Areas of Operation	Australia and New Zealand	

EA

GAMES

Nintendo



EB ETHOS



Family.
Integrity.
Vision.
Vitality.
Accountability.
Recognition.

Our Values

Our EB Ethos reflects the heart and soul of EB Games. It defines how we do things, what we stand for and what it takes to work here.

When we interact with our customers and colleagues the EB Ethos helps us develop and grow. Together these values form a culture that we think is unique and sets us apart from the rest.

We are proud of our diverse culture and strive to create an inclusive environment for all employees.

We welcome individuals from diverse backgrounds to be part of the EB Games family.

Our Brands

EB GAMES

The retail sale of video game and computer equipment, software, digital currency and subscriptions, accessories, games, pop culture items, collectibles, related apparel, and other merchandise.



The retail sale of merchandise related to movies, television shows, the internet, games, books, music and other popular culture mediums including toys, comics, trading cards, clothing, screen media, apparel, board games and other items of a collectable or popular culture nature.



MONOPOLY
GAMER

AGES 8+
2-4 Players

Collector's Edition

Hasbro Gaming

Nintendo

Price tag: \$65

Our Supply Chain

We have large and far reaching supply chains which is reflected in the diversity of products we bring to the market and the scale of our operations.

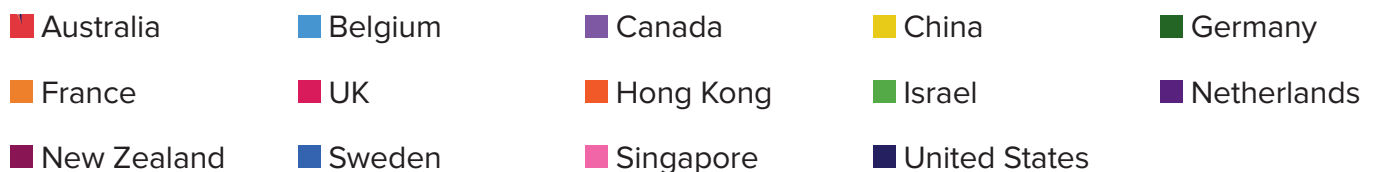
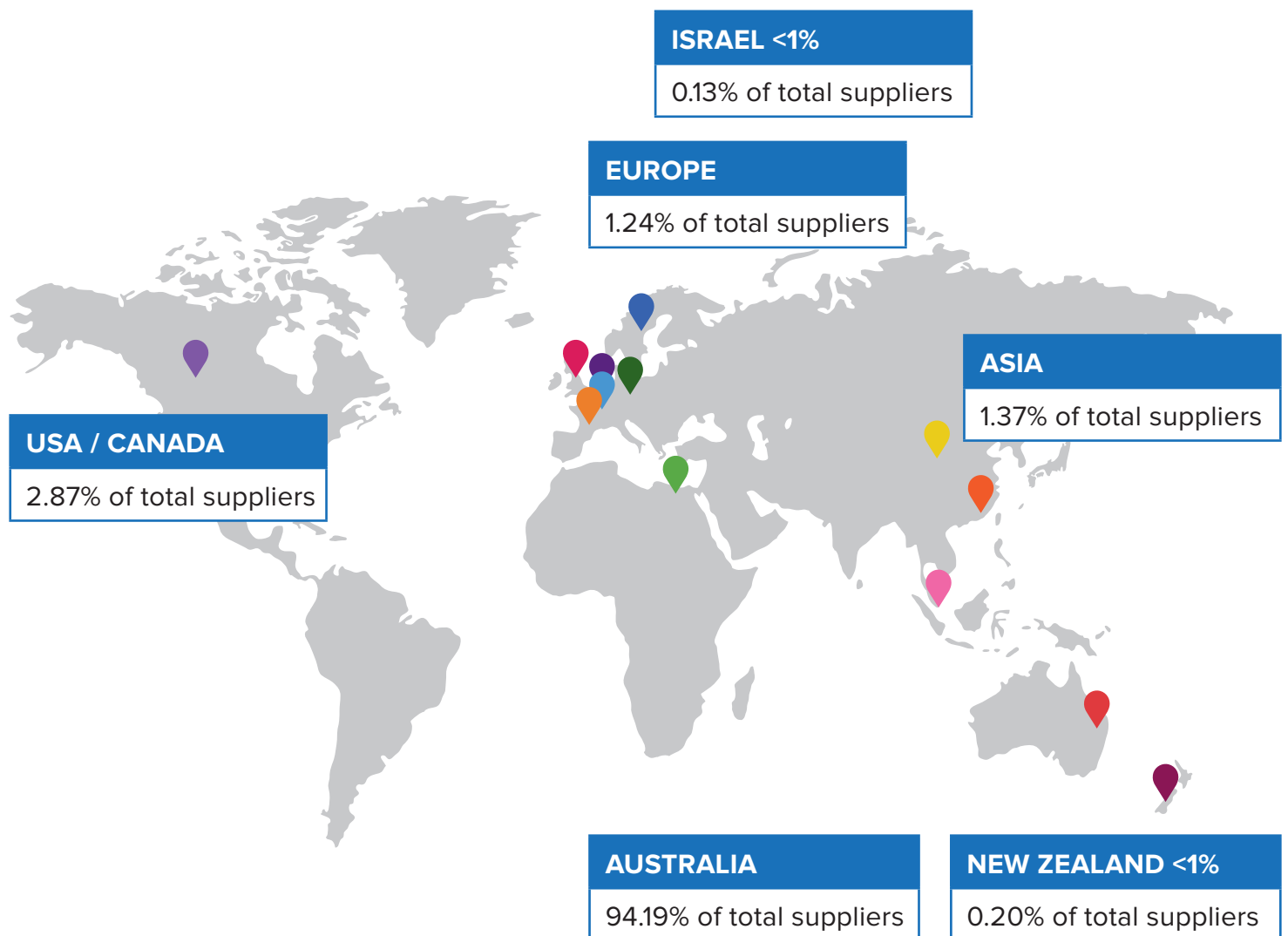
Over 90% of our annual spend with suppliers is with Australian companies. In some instances, we are dealing with offices of global companies located in Australia or Australian based subsidiaries which results in a high percentage of our cash spend remaining in Australia.

We acknowledge that in some circumstances the product provided by the supplier is not necessarily produced or distributed from their Australian office.

When considering our supply chain, we have looked at a range of aspects within our business, including the supply of:

- Physical product sold by our company
- Manufacturers our business engages to make products on our behalf
- External professional advisors
- Office suppliers such as stationary, cleaners, etc.
- Real estate

Geographical Location of Suppliers



Risks In Supply Chain

We have worked through our organisation as a whole, reviewing the above areas in our supply chain, to separate out the areas where we have identified potential risks of modern slavery in our business. This risk has then been split into two categories –

- Operational risk
- Production and buying risk

Operational Risk

Our operations are based entirely in Australia and New Zealand. We have been able to undertake a thorough review of potential modern slavery risks in the operational aspects of our organisation because of our domestic location.

People are our strength. We recruit and develop a diverse team of high performers and strong leaders who love winning, embrace change, and embody the values of EB Ethos.

At EB Games we pride ourselves on the quality of working conditions provided to our staff across the business and ensure we go above and beyond to instil a sense of value and empowerment. We are constantly ensuring all employment law requirements are met for our staff in both Australia and New Zealand and are swift to implement any necessary changes or updates as required.

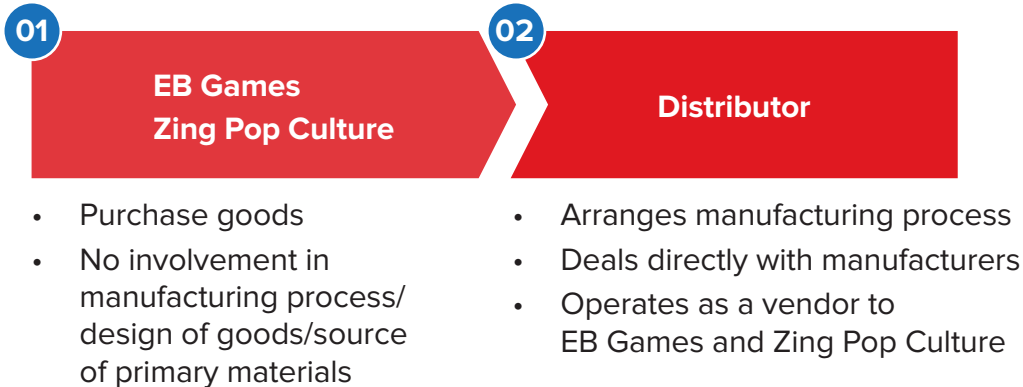
It is because of this we are proud to confirm the risk of modern slavery from an operational perspective is very low.

Production and Buying Risk

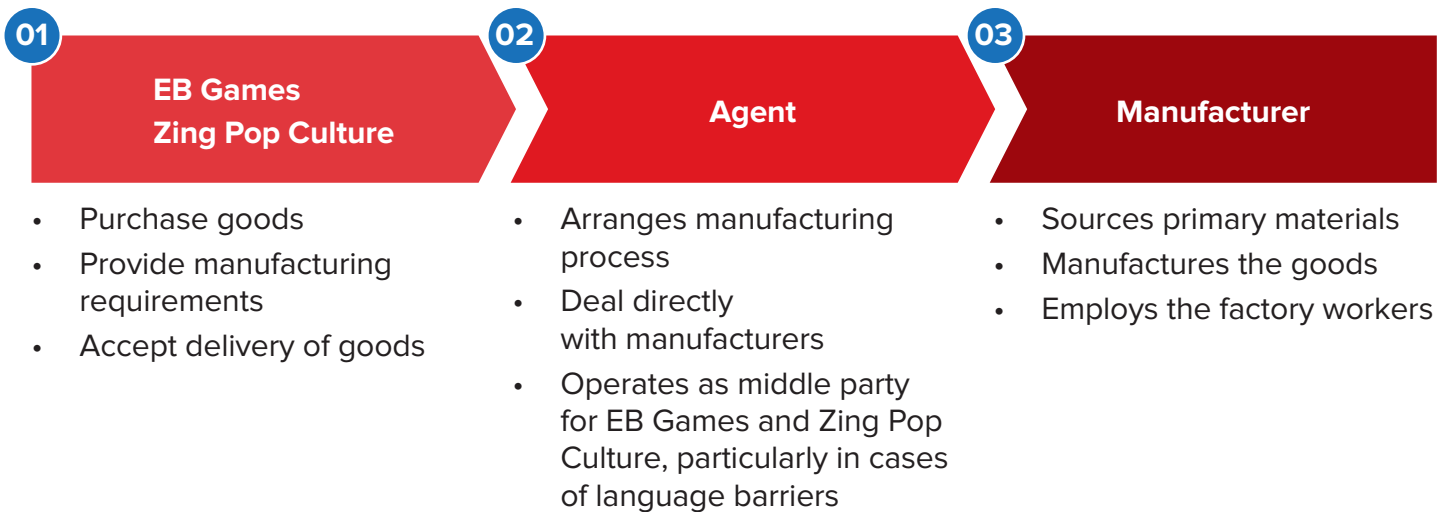
Our supply chain with respect to the product we sell and manufacture holds the largest area for the opportunity of modern slavery.

When reviewing this specific supply chain in our organisation we have broken it down into three main segments (see next page):

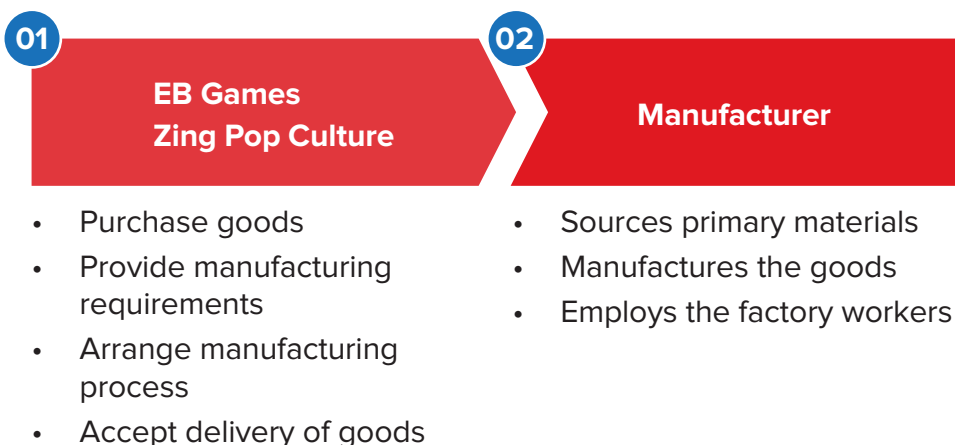
EB Games buys direct from distributor



EB Games engages an agent to deal with manufacturer



EB Games engages manufacturer directly



Risk Assessment And Due Diligence

EB Games → Distributor

In circumstances where we purchase goods directly from a distributor/vendor EB Games is not involved with the manufacturing process.

Despite not being involved in the manufacturing process we still require adherence to strict employment standards by the distributor and

endeavour to ensure all vendors/distributors to comply with the GameStop Vendor Product Quality Terms and Conditions ('Terms and Conditions') and the Supplier Code of Conduct ('Code').

The Terms and Conditions and the Code sets out the required employment standards, including –

NO	<ul style="list-style-type: none"> • Child labour • Forced labour • Harassment or coercion • Bribery • Fraud
MUST NOT	<ul style="list-style-type: none"> • Discriminate • Restrict freedom of association
MUST	<ul style="list-style-type: none"> • Ensure the Code is communicated to employees, and authorised subcontractor employees (including posting a copy in the local language in a place readily accessible to employees at all times) • Pay at least minimum wages and provide required benefits and entitlements • Provide reasonable working hours with days off • Provide safe and healthy workplaces

In addition to these requirements, we retain the right to conduct periodical audits to ensure their compliance with the Terms and Conditions and the Code. Failure to comply with our Terms and Conditions and the Code entitles us to suspend future orders or terminate any existing purchase orders.

**EB Games → Agent →
Factory and EB Games → Factory**

When dealing with manufactures, whether through an agent or directly, our company has strict measures in place to ensure we are minimising our risk of modern slavery.

For all manufacturers we work with we require a Business Social Compliance Initiative ('BSCI') or similar third party audit to be conducted and an achievement of a 'C' grade or higher in each category.

Any areas that do not achieve at least a 'C' grade compliance are required to be remediated by the next audit. If a manufacturer fails to reach minimum standards by the second audit, we terminate our agreement and cease

all business dealings with them.

For most scenarios where we engage factories to manufacture products on our behalf we are also partnering with a licensor.

Where a licensor is involved, we provide a copy of the BSCI audit for the licensor to confirm the accuracy of the audit report and to issue any remediation notices. Once the licensor has approved the manufacturer we proceed with the agreement.

The licensors we partner with hold very high standards for manufactures and do not waiver in their requirements.

In the rare instances where we are not dealing with licensed product, we undertake to obtain the BSCI audit report and conduct a follow up where remediation is required.

Remediation

EB Games is committed to promoting a culture of ethical behaviour, compliance, and good corporate governance.

As part of this EB Games has a Whistleblower Policy accessible to all employees in the company. We are committed to supporting a whistleblower while they raise concerns and protecting them throughout the process.

We also insist on compliance and rectification of deficient areas in BSCI audit reports received from manufacturers and refuse to deal with companies that do not meet our requirements.

Assess Effectiveness Of Actions

Our current approach to measuring the effectiveness of our actions includes –

- Continual monitoring of our current systems
- Engagement of external parties to conduct audits
- Reviewing compliance with our Supplier Code of Conduct and Vendor Product Quality Terms and Conditions
- Strong governance

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Consultation

Whilst we do not have any subsidiary companies, we ensure that the practices implemented into our Australian business are mirrored in our New Zealand business.

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Future Commitments

Over the next financial year, we will focus on –

- Continuing to review and update and processes and procedures currently in place
- Assessing ourselves against the requirements of the *Modern Slavery Act 2018 (Cth)*

Stephen Charles Wilson
Managing Director

*Approved by the Board of Directors for Electronics Boutique Australia Pty Limited ACN 077
681 442*



EB GAMES **ZING** POP CULTURE