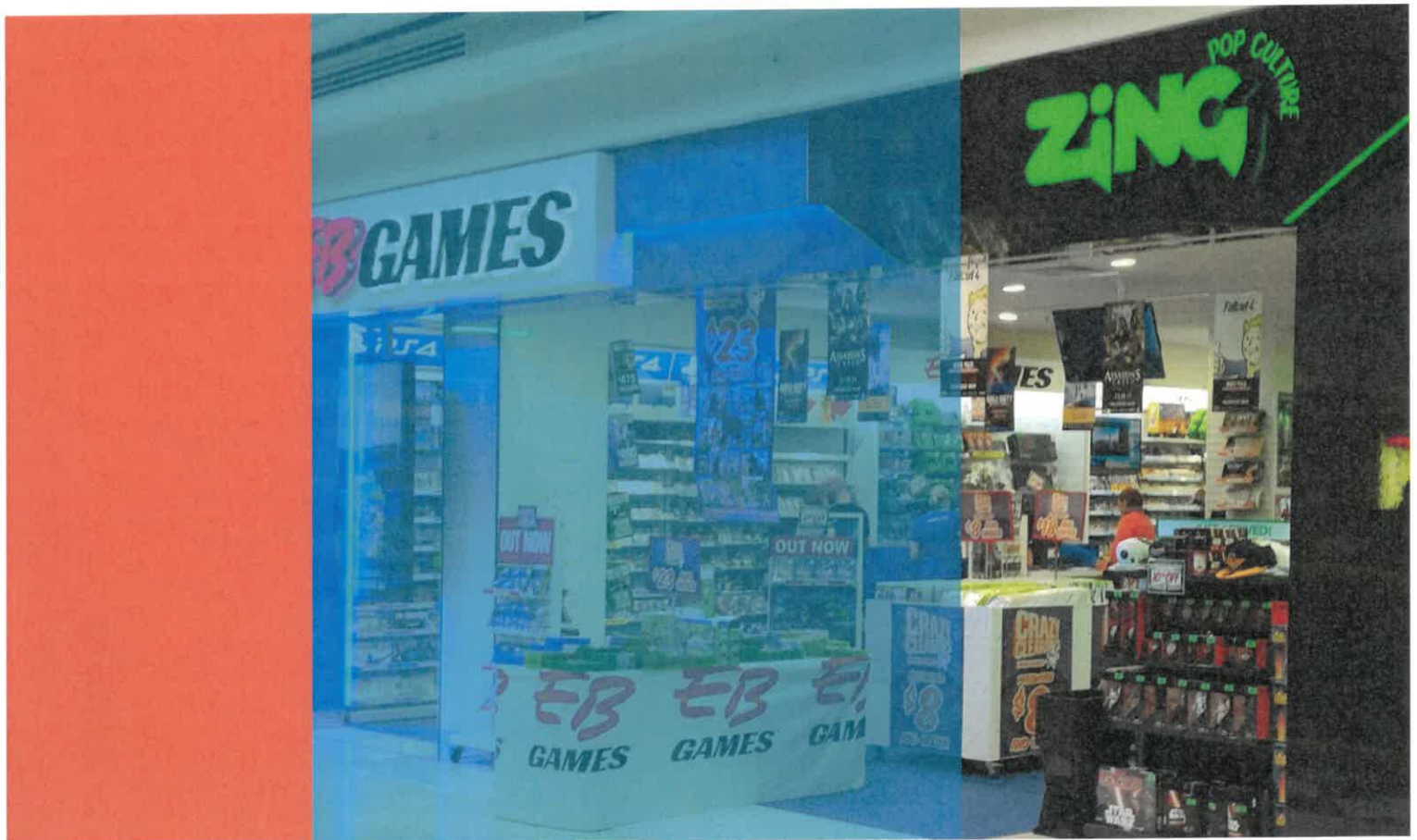


# Modern Slavery Statement

2023/2024 Financial Year



**EB GAMES**

**ZING**  
POP CULTURE

# Reporting Entity

---

Over the last 27 years, the reporting entity, Electronics Boutique Australia Pty Ltd ACN 077 681 422, trading as EB Games (**EB Games, we, our, us**) has become one of Australia's leading retailers and has grown to more than 400 corporate stores across Australia and New Zealand under two brand names, EB Games and Zing Pop Culture.

EB Games became an entity of GameStop Corp (**Gamestop Group**) in 2004. Gamestop Group operates more than 4,100 company stores across 7 countries.

During the financial year ending January 2024 (**2024 Reporting Period**), EB Games continued to work towards minimising modern slavery within its own business operations and supply chains. This statement intends to meet the requirements of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and describes the steps taken by EB Games in addressing modern slavery.



## COMPANY FACT SHEET- Structure and Operations

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

百

GAMES

Nintendo



# EB ETHOS



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

## 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. All EB Games employees in Australia are required to comply with EB Game's Code of Conduct and its key principles.

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

---

The logo for EB Games, featuring the letters 'EB' in a stylized, red, italicized font, followed by the word 'GAMES' in a bold, black, italicized sans-serif font.

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 logo for ZING Pop Culture, featuring the word 'ZING' in a large, green, stylized font with a jagged, speech-bubble-like outline. Above the 'ING' part of 'ZING', the words 'POP CULTURE' are written in a smaller, green, sans-serif font, following the curve of the top of the 'ZING' letters.

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.



# Our Supply Chain

---

We have large and far-reaching supply chains which are reflected in the diversity of the 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.

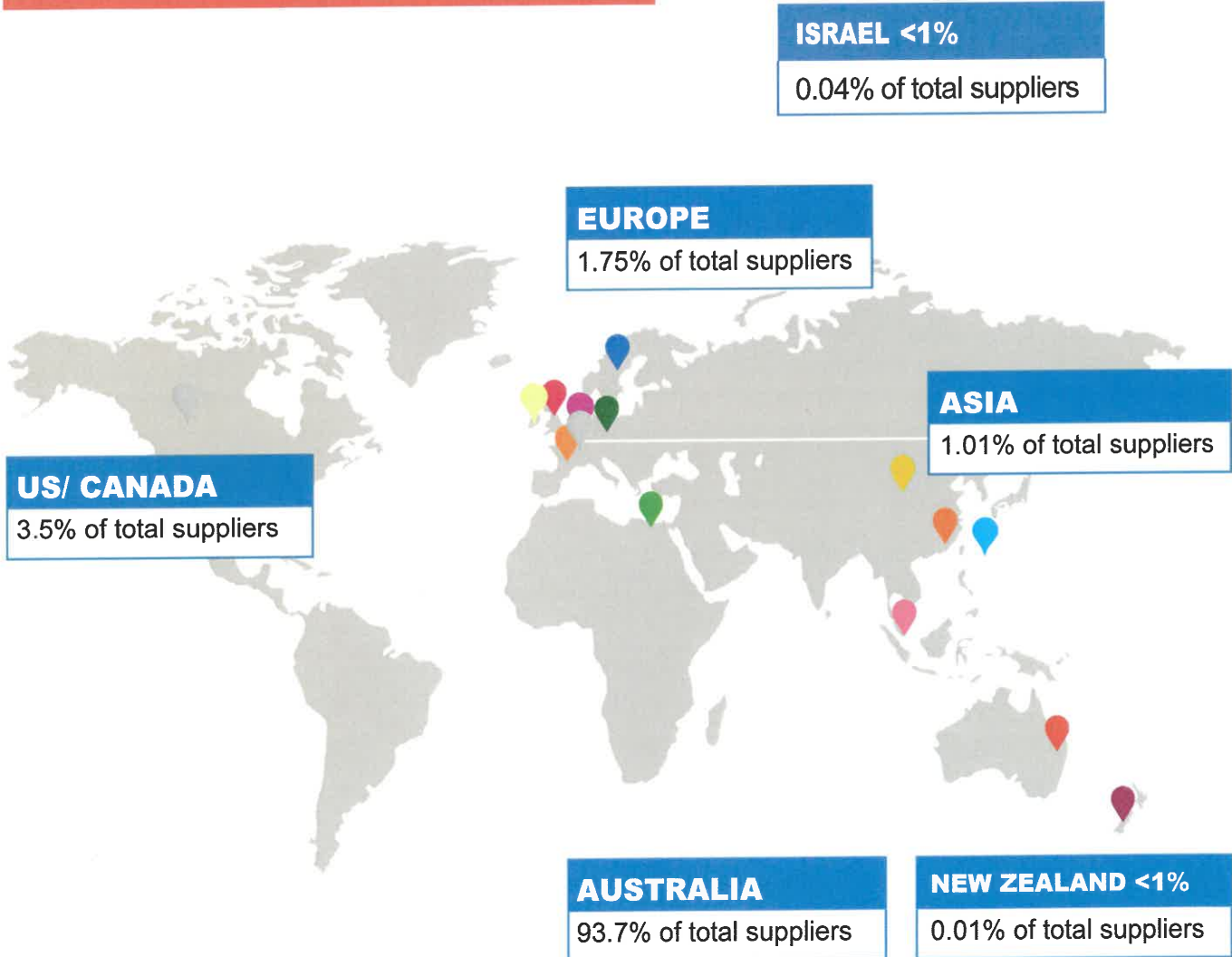
We acknowledge that in some circumstances the product provided by the supplier is not necessarily produced or distributed from their Australian office.

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

- Physical products sold by our company;
- Manufacturers our business engages with to make products on our behalf;
- Manufacturers engaged to make our store fixture systems;
- External professional advisors (including but not limited to legal, consulting and financial services);
- Promotional goods and marketing;
- Cleaning services;
- Office suppliers of stationery etc.;
- Information technology and communications; and
- Real estate and property services (including but not limited to facilities management, utilities and waste management).



# Geographical Location of Suppliers



- Australia
- UK
- Singapore
- United States
- Taiwan
- France
- Sweden
- China
- Germany
- Luxembourg
- New Zealand
- Hong Kong
- Israel
- Netherlands
- Ireland

# Risks in Supply Chain

We are committed to continuously improving transparency within our business and operations. We do not tolerate any instances of modern slavery.

We continue to work 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 in causing, contributing to or being directly linked to modern slavery in our business. This risk has then been split into two categories –

- Operational Risks
- Production and Buying Risks

## Operational Risks

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 and our Code of Conduct.

Our Code of Conduct ensures all employees act respectfully and responsibly towards the community, comply with law and recognise human rights. This Code of Conduct is a fundamental part of our corporate social responsibility.

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 current employment law requirements for the 2024 Reporting Period are met for our staff in both Australia and New Zealand and are swift to implement any necessary changes or updates as required.

We consider the risk of modern slavery within our direct business operations in Australia and New Zealand during this reporting period to be low.

## Production and Buying Risks

The most significant risks associated with our supply chain for the 2024 Reporting Period are the suppliers we used to acquire the products we sell and manufacture, and the items we purchased. As part of the continual review of our supply chain risks we have assessed our relationships with distributors, manufacturers we deal with indirectly through agents, and manufacturers we directly engage.

These potential risks associated with our supply chain are indirect and involve:

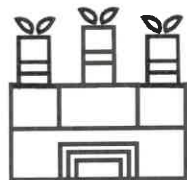
- the possibility of suppliers and their supply chain, particularly in circumstances where they are producing uniforms, items of clothing and electronic goods, being involved in modern slavery practices such as forced or compulsory labour, excessive working hours, poor working conditions and wage exploitation;
- the geographical locations of our suppliers' supply chains, where a higher prevalence of modern slavery has been detected due to poor governance, socio-economic weaknesses including poverty, and compromised rule of law. We continue to purchase store fixtures through three main Australian suppliers who source from factories in Taiwan for manufacturing such fixtures. This is outlined in the diagram on the next page.

## Production and Buying Cycle

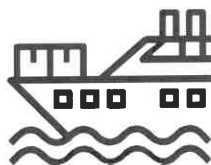
**Head Office EB Games  
Zing Pop Culture**



**Australian based  
supplier**



**Manufacturer  
located in Taiwan**



**Fixtures dispatched  
via sea freight**

**Fixtures delivered from  
Port to Head Office  
Distribution Centre**



**Fixtures dispatched  
to relevant stores**

# Risk Assessment and Due Diligence

Through working with our suppliers, we have come to learn most of them still have employees working directly with the factories in China and Taiwan. Their local team members carry out inspections of the properties and in some cases have offices in the factories. There is, however, no formal procedures or standards required of the factories before they commence manufacturing of our products.

As a part of our due diligence to tighten our procedure and to minimise the risk of modern slavery, we partner with The Walt Disney Company (**Disney**), and adhere with their standards, the Facility and Merchandise Authorisation (**FAMA Audit**), for all vendors we engage to manufacture under licence and their facilities which provide high level licensed goods. FAMA Audits are required for all engaged licenced vendor facilities as a part of our due diligence. In circumstances where a vendor subcontracts to another company for production, a FAMA Audit must be completed.

Where our engaged licenced vendors or their subcontractors, do not hold a FAMA Audit certificate, production will be halted until this certification is received.

During the 2024 Reporting Period, we continued to receive FAMA Audit certificates to which we reviewed to ensure all supplier facilities met the required FAMA standards. As part of our audits through the FAMA Audit system, we found less than 1 of licenced vendors and their subcontractors did not hold a FAMA Audit Certificate. In such circumstances, to continue and strengthen our vendor relationships, we worked with these vendors to address any risks of modern slavery and receive FAMA Audit Certification.

We aim to continue to assess the FAMA Audit process, its ability to decrease modern slavery practices and our use of such audit system in the future.

We also implement the GameStop Group Vendor Product Quality Terms and Conditions (Vendor Terms

and Conditions), which include, but are not limited to, the following terms for Vendors of EB Games:

- non-engagement of child labour, forced labour or bribery;
- non-discrimination;
- minimum wage requirements as per local law;
- reasonable employee work hours; and conflict free and responsible sourcing of Conflict Minerals and diamonds.

We retain the right to conduct periodical audits to ensure compliance of suppliers with the Vendors Terms and Conditions. Where suppliers fail, we maintain the right to suspend future orders or terminate existing purchase orders.

Other risk management mechanisms we have implemented include:

- policies and procedures including a whistle-blower policy and code of conduct, of which are continuously updated;
- training for employees and new employees, with regular communication to employees of any changes or increased modern slavery risks employees should be aware of;
- continuously updated internal grievance resolution procedures and guidelines employees can access; and
- adequate reporting and monitoring mechanisms. These mechanisms assist with investigations and analysis of complaints. Following investigations of any reported issues, we take appropriate steps to address matters once substantiated.

During the 2024 Reporting Period, we had no known breaches of the Vendor Terms and Conditions by our Suppliers, nor did we become aware of any instances of modern slavery in our supply chain or operations. We continue to monitor the effectiveness of these Vendor Terms and Conditions, along with any modern slavery key risks relevant to future reporting periods.

# Our Fixtures

---



# 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 whilst they raise concerns and protecting them throughout the process. Our Whistleblower Policy is regularly being updated to improve our processes in supporting whistleblowers.

For internal grievance resolution procedures, EB Games have a Respectful Workplace Policy and Guidance which allows all employees to raise concerns to any managers in the business. Managers then have an obligation, once receiving a concern, to remediate accordingly. We aim to continue to improve our internal grievance resolution procedures for employees, with specific focus on dealing with any modern slavery concerns.

EB Games have a HR hotline and inbox, which is made available to all employees of the company and is constantly monitored by trained HR professionals to remediate. We regularly review and update our HR hotline and inbox processes, along with our internal grievance resolution procedures.

During the 2024 Reporting Period, we had no reports made to us on concerns of suspected breaches of our Code of Conduct in relation to

modern slavery conduct. We will continue to monitor and investigate any reports as appropriate, and we will continue to implement these reporting mechanisms into the future.

EB Games also encourages anonymous feedback through company surveys, which then can be remediated by the Director team. In the 2024 Reporting Period, we issued company surveys to all of our employees, seeking anonymous feedback on our practices. We have since attended to the feedback received in both the 2023 Reporting Period and 2024 Reporting Period, implementing changes where necessary to ensure all remediation processes within the company are to a high standard.

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. In the 2024 Reporting Period, we had 0 instances of noncompliance by manufacturers in their BSCI audit reports. We will continue monitoring and ensuring BSCI audit report compliance in the 2025 Reporting Period.

Annual training is provided to all employees and new employees of EB Games, in addition to the reporting and monitoring mechanisms mentioned in this section.



# Assess Effectiveness Of Actions

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

- Continual monitoring of our current systems - In the 2024 Reporting Period we discovered an increase in reporting and use of our reporting mechanisms.
- Engagement of external parties to conduct audits.
- Reviewing compliance with our Vendor Product Quality Terms and Conditions, and FAMA Audit regularly.

Strong governance

”





# Consultation

---

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

Gamestop Group and its Australian controlled entities, including EB Games and Zing Pop Culture, maintained the same management systems, frameworks, policies and procedures such as Vendor Terms and Conditions in the 2024 Reporting Period.

”



# Future Commitments

---

EB Games continue to acknowledge their obligations in ensuring adherence with the Modern Slavery Act to minimise the risks of modern slavery within our supply chain.


We intend to continue reviewing and updating all policies, procedures (for manufacturers etc.), Vendor Terms and Conditions and FAMA Audits adopted by us. We aim to further prioritise our improvements and strengthening of actions in addressing modern slavery risks for future reporting cycles.

In the 2025 Reporting Period, we aim to improve our modern slavery risk assessment and reporting practices by:

- (a) working with our key suppliers and assessing those which have the highest level of risk; and
- (b) exploring additional due diligence mechanisms for us to adopt when assessing our practices and our supply chain risks.

Moving forward we will continue managing our BSCI audits and engaging with our key suppliers, stakeholder groups and industry bodies.

Signed  
by Stephen Charles Wilson  
on 22 / 07 /2024

  
A \_\_\_\_\_  
Signature of Stephen Charles Wilson

**Stephen Charles Wilson**  
**Managing Director**

This Modern Slavery Statement was approved by the Board of Directors of Electronics Boutique Australia Pty Limited ACN 077 681 422 on 22 July 2024 and signed by Stephen Charles Wilson, the Managing Director of Electronics Boutique Australia Pty Limited 077 681 422.



**EB GAMES**

**ZING** POP CULTURE