



DICK'S SPORTING GOODS, INC.

I. Purpose:

To ensure compliance with the law and policy and to ensure accurate and timely mineral information is provided by **vendors and factories** to DICK'S to facilitate compliance with **Section 1502 of the Dodd-Frank Act**.

II. Background:

United States (U.S.) publicly listed companies are required to disclose annually to the Securities and Exchange Commission (SEC) their due diligence to determine whether the minerals **tin, tantalum, tungsten and gold**, known as **3TG**, are used in the products they manufacture.

3TG reporting is mandated by **Section 1502 of the Dodd-Frank Act**, released by Congress in 2012. The legislation addresses the concern that the trade of 3TG originating in a Covered Country is financing armed conflict. **Covered Countries** include Angola, Burundi, Central African Republic, the Democratic Republic of the Congo, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia. **3TG** are referred to in the legislation as **conflict minerals**.

3TG are derived from:

- Cassiterite, from which the mineral **tin** is extracted;
- Columbite-tantalite, from which the mineral **tantalum** is extracted;
- **Gold**;
- Wolframite, from which the mineral **tungsten** is extracted;
- Any other minerals or their derivatives determined by the Secretary of State to be financing conflict in the **Covered Countries**.

The final rule on Section 1502 endorses the Organization for Economic Cooperation and Development's (OECD) Guidance on Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas¹ as a framework companies may use to fulfill the legal requirement.

III. Summary:

DICK'S is committed to supporting responsible sourcing of **3TG**. Vertical brand vendors, factories and suppliers of DICK'S are expected to supply materials and products to DICK'S that are "conflict-free," which means that the functionality or production of supplied materials must not directly or indirectly fund armed conflict in a **Covered**

¹ DICK'S identifies Covered Countries as Conflict-Affected and High-Risk Areas.

Country. Vendors, factories and suppliers must demonstrate compliance with this policy and respond timely and accurately to requests regarding **3TG** usage for products that:

- Include **3TG** necessary to the functionality or production of the product
- Are contracted to be manufactured by DICK'S

Vertical brand vendors and factories to DICK'S must adopt a policy regarding conflict-free sourcing of **3TG** consistent with this DICK'S policy, implement management systems to ensure compliance with the policy and require their suppliers to take the same steps. Full transparency and thorough supply chain due diligence to identify mineral **smelters**², when applicable, is required as part of doing business with DICK'S.

In the event that DICK'S determines that a **vendor's or factory's** efforts to comply with this policy have been deficient and the **vendor or factory** fails to cooperate in developing and implementing reasonable remedial steps, DICK'S reserves the right to take appropriate actions up to and including discontinuing purchases from the vertical brand vendor and/or factory.

IV. Policy Details

Affected vertical brand vendors and factories must:

1. Adopt a policy regarding conflict-free sourcing of 3TG consistent with this DICK'S policy, implement management systems to ensure compliance with the policy and require their **suppliers** to take the same steps.
2. Ensure all identified **stakeholders** read and retain information and training materials provided by DICK'S. All identified stakeholders must fully complete and return information requests from DICK'S in an accurate and timely manner. **Vendors and factories** must request and receive written information from **suppliers** regarding the source of **3TG** necessary to the production of the vendor's product.
3. Complete a responsible minerals survey annually and return to DICK'S.
4. Respond timely to additional questions posed by DICK'S after initial receipt of required minerals information.
5. Where possible, utilize **smelters and refiners** that are conformant with the

²A smelter, also known as a refiner, is a company that procures and processes mineral ore, slag and/or materials from recycled or scrap sources into refined metal or metal containing intermediate products. The output can be pure (99.5% or greater) metals, powders, ingots, bars, grains, oxides or salts. Smelters relevant to this policy procure and process the following minerals: cassiterite, columbite-tantalite, gold, wolframite, and any other minerals or their derivatives determined by the Secretary of State to be financing armed conflict in a Covered Country.

[Responsible Minerals Assurance Process](#) and are included on the [RMI Conformant Smelters and Refiners List](#).

6. Take appropriate action to ensure a conflict-free supply chain and to remedy non-conformances with vendor's responsible minerals policy, up to and including termination of sourcing agreement with non-conformant **supplier**.

V. Linked/ Related Documents:

[Obama White House Archives - Wall Street Reform: The Dodd-Frank Act](#)

[Dodd-Frank Wall Street Reform Act – Conflict Minerals Rule](#)

[SEC Fact Sheet: Disclosing the Use of Conflict Minerals](#)

[Responsible Minerals Initiative](#)

[Responsible Minerals Assurance Process \(RMAP\)](#)

[Responsible Minerals Reporting Template](#)

[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)

VI. Enforcement

Vendors and factories who delay in responding to compliance documentation, information, policy or corrective action plan requests will be assessed an administrative fee.