

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

Part I Reporting Issuer

1 Issuer's name GameStop Corp.		2 Issuer's employer identification number (EIN) 20-2733559	
3 Name of contact for additional information Daniel Moore	4 Telephone No. of contact (817) 424-2001	5 Email address of contact tax@gamestop.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 625 Westport Parkway		7 City, town, or post office, state, and ZIP code of contact Grapevine, TX 76051	
8 Date of action October 7, 2025		9 Classification and description Warrant dividend	
10 CUSIP number 36467W 117	11 Serial number(s) N/A	12 Ticker symbol GME WS	13 Account number(s) N/A

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ► **On September 8, 2025, the board of directors of GameStop Corp. ("GME") approved a warrant dividend to be distributed (the "Distribution") on October 7, 2025 (the "Distribution Date") to all GME shareholders of record as of October 3, 2025 (the "Record Date"). Each GME shareholder received one warrant for every ten shares of GME Class A Common stock held, rounded down to the nearest whole warrant, by such shareholder at the Record Date. The Distribution was made pro rata to all common shareholders and no cash or other property was distributed. In connection with this distribution, holders of the Company's convertible notes also received warrants pursuant to the anti-dilution provisions contained in the indentures governing the convertible notes. Each warrant entitles the holder to purchase, at the holder's sole and exclusive election, at a cash exercise price of \$32.00, one share of GME common stock. The warrants will expire at 5:00 p.m. New York City time on October 30, 2026 (the "Expiration Date"). The warrants are exercisable at any time through the Expiration Date.**

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ► **The Company expects the warrant dividend to shareholders to be treated as a nontaxable distribution under Section 305(a) of the Internal Revenue Code. Under Treasury Regulation Section 1.307-2(a), if the fair market value of the warrants at the time of the distribution were less than 15% of the fair market value of the GME common stock with respect to which the warrants were distributed, no allocation of basis is required between the common stock and the warrants unless the shareholder elects otherwise. If the shareholder elects to allocate basis, such allocation should be made based on their relative fair market values on the distribution date. The Company is not aware of any cases or IRS rulings that address the tax treatment of a warrant distribution to convertible noteholders, and therefore the tax treatment for the warrant distribution to those noteholders is uncertain. The distribution of the warrants to the noteholders does not appear to be governed by Section 301 and Section 305, but instead appears to be governed by the normal tax rules applying to debt. For tax purposes, any payments received by a debtholder are generally applied first to accrued interest and then to principal. Because the notes have a 0% rate of interest, the warrant distribution may be applied entirely to the principal amount, resulting in a reduction in the holder's basis in the notes. Noteholders should consult their own tax advisor on tax treatment.**

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ► **The Company has determined that the fair market value of the warrants on the Distribution Date was less than 15 percent of the fair market value of the common stock and therefore no allocation of basis is required unless the shareholder elects otherwise. If a shareholder elects to allocate basis under Section 307 of the Internal Revenue Code, the shareholder's total basis in the GME common stock before the distribution should be allocated between the stock and warrants based on their relative fair market values as of the Distribution Date. U.S. federal tax law does not specify the manner in which the market value of the warrants and the common stock on the Distribution Date are to be determined. Convertible noteholders are anticipated to take a basis in the warrants equal to their fair market value on the distribution date. The Company anticipates that noteholders would reduce their basis in the convertible notes by the fair market value of the warrants. There may be other possible ways to treat the warrants for tax purposes, and holders are urged to consult their own tax advisors.**

Part II **Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ► Section 305(a), and Section 307 of the Internal Revenue Code, as amended, for the warrant distribution to shareholders.

18 Can any resulting loss be recognized? ► No loss is recognized in connection with the receipt of the warrants in the Distribution.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► The organizational action occurred on the Distribution Date. The holding period for the warrants begins the day after the Distribution Date. Under Treasury Regulation Section 1.307-2(a), shareholders who wish to elect to allocate basis between the common stock and the warrants must make that election on their federal income tax return for the taxable year in which the distribution occurred. GameStop does not provide tax advice. Shareholders and convertible noteholders should consult their tax advisors regarding the tax consequences of this distribution including determination of the fair market values, any elections under Treasury Regulation Section 1.307-2(a), and the tax treatment of the warrants received by the convertible noteholders.

Sign Here	Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.				
	Signature ► <u>Daniel Moore</u> DocuSigned by: B8DC798DF48D480...		Date ► <u>11/19/2025</u>		
Paid Preparer Use Only	Print your name ► <u>Daniel Moore</u>		Title ► <u>Principal Financial Officer</u>		
	Print/Type preparer's name	Preparer's signature	Date	Check ☐ if self-employed	PTIN
	Firm's name ►			Firm's EIN ►	
	Firm's address ►			Phone no.	