



CODE OF ETHICS FOR SENIOR FINANCIAL AND EXECUTIVE OFFICERS

GameStop Corp. (the “Company”) is committed to full and accurate financial disclosure in compliance with applicable laws, rules, and regulations and to maintaining its books and records in accordance with applicable accounting policies, laws, rules, and regulations. This Code of Ethics for Senior Financial and Executive Officers (this “Code of Ethics”), applicable to (i) the Company's Principal Executive Officer, Principal Financial Officer, and Principal Accounting Officer, (ii) any Executive Officer of the Company, (iii) any Senior Vice President or Vice President within the U.S. Finance Department of the Company, and (iv) any country Managing Director, or country Financial Director (collectively, the “Senior Financial and Executive Officers”), sets forth specific policies to guide the Senior Financial and Executive Officers in the performance of their duties.

You are bound by the requirements and standards set forth in the Code of Standards, Ethics & Conduct, as well as those set forth in this Code of Ethics and all other applicable policies and procedures.

Compliance with Rules and Regulations

The Company is committed to conducting our business in accordance with all applicable laws, rules, and regulations. As a Senior Financial and/or Executive Officer, you must comply with applicable laws, rules, and regulations.

Disclosures in Periodic Reports

As a public company, the Company is required to file various periodic reports with the Securities and Exchange Commission. It is Company policy to make full, fair, accurate, timely, and understandable disclosure in compliance with all applicable laws and regulations in all required periodic reports. As a Senior Financial and/or Executive Officer, you are required to know what various periodic reports the Company is required to file, and you must provide accurate information pertinent for this reporting in a timely manner.

Conflicts of Interest

You must avoid any activity or personal interest that creates, or appears to create, a conflict between your interests and the interests of the Company. A conflict of interest occurs when your private interests interfere in any way, or even appear to interfere, with the interests of the Company as a whole.

A conflict situation can arise when a Senior Financial and/or Executive Officer takes actions or has interests that may make it difficult to perform their Company work objectively and effectively. Conflicts of interest also arise when a Senior Financial and/or

Executive Officer, or a member of their family, receives improper personal benefits as a result of their position in the Company. Loans to, or guarantees of obligations of, such persons are of special concern. For the purposes of this Code, 'family' means a child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, and any person (other than a tenant or employee) sharing the household of the Senior Financial and/or Executive Officer.

Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with the Chief Financial Officer or General Counsel. Any Senior Financial and/or Executive Officers who becomes aware of a conflict or potential conflict should bring it to the attention of the Chief Financial Officer or General Counsel, or consult the procedures described in this Code of Ethics.

A passive ownership interest representing less than five percent (5%) of the capital stock of a publicly held corporation shall not, in and of itself, be deemed to constitute a conflict of interest or interference with the interests of the Company under this Code.

Corporate Opportunities

Except as may otherwise be permitted by the Company in accordance with applicable law, Senior Financial and Executive Officers are prohibited from (1) taking for themselves opportunities that are discovered through the use of Company property, information or position without the consent of the Audit Committee of the Board of Directors of the Company, (2) using Company property, information or position for improper personal gain, and (3) competing with the Company. Senior Financial and Executive Officers owe a duty to the Company to advance the Company's legitimate interests whenever possible.

Permitted Activities and Governing Agreements

Any outside activities, board memberships, or investment activities that are expressly permitted under the terms of a Senior Financial or Executive Officer's definitive written employment, equity, or compensation agreement with the Company shall be deemed to have received the necessary consent of the Audit Committee and do not constitute a conflict of interest or a prohibited corporate opportunity under this Code.

Compliance with the Code of Ethics

If you know of or suspect a violation of applicable laws or regulations or the Code of Ethics, you must immediately report that information to the Chief Financial Officer, the General Counsel, or the Chief Executive Officer (or, with respect to the Chief Executive Officer, the Audit Committee of the Board of Directors). No one will be subject to retaliation because of a good faith report of suspected misconduct.

Waivers of the Code

Changes in, and waivers of this Code of Ethics may only be made by the Board of Directors or the Audit Committee of the Board of Directors and will be disclosed as required under applicable law and regulations.

No Rights Created

This Code of Ethics is not intended to and does not constitute an employment contract or assurance of continued employment, and does not create any rights in any employee, client, supplier, competitor, shareholder, or any other person or entity.

Document History

Date of Amendment	Nature of Amendment
November 8, 2016	Initial Adoption
January 17, 2020	Minor updates and clarifications
March 11, 2026	(i) Streamline sections regarding Conflicts of Interest and Corporate Opportunities to take a more principles-based approach regarding such matters, (ii) include clarifications regarding activities that do not constitute conflicts of interests and other permitted activities that are governed by other agreements approved by the Company, and (iii) make certain other technical/non-substantive changes

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ACKNOWLEDGMENT FORM

I have received and read the Code of Ethics for Senior Financial and Executive Officers, and I understand its contents. I agree to comply fully with the standards, policies, and procedures contained in the Code of Ethics and the Company's related policies and procedures. I understand that I have an obligation to report to the Principal Financial Officer or Principal Executive Officer (or, with respect to the Principal Executive Officer, the Audit Committee of the Board of Directors) any suspected violations of the Code of Ethics of which I am aware. I certify that, except as fully disclosed in accordance with the terms of this Code of Ethics, I have not engaged in any transactions or activities that would constitute an actual or apparent conflict with the interests of the Company and that I will identify any future actual or apparent conflicts to the Chief Financial Officer or Chief Executive Officer. I further certify that I am in full compliance with the Code of Ethics and any related policies and procedures.

Signature

Printed Name

Title

Date