

ABERCROMBIE & FITCH CO. CONFLICT MINERALS POLICY

Background

In 2010, Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”), which requires certain companies to disclose their use of “conflict minerals” if those minerals are necessary to the functionality or production of a product manufactured by or on behalf of those companies. Under the Act, conflict minerals include **tantalum, tin, gold and tungsten**.

Congress enacted Section 1502 of the Act because of concerns that the exploitation and trade of conflict minerals by armed groups is helping to finance conflict in the Democratic Republic of the Congo and surrounding countries (Angola, Burundi, Central Africa Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia) (“covered countries”) and is contributing to an emergency humanitarian crisis.

A&F's Commitment

Abercrombie & Fitch Co. (“A&F”) supports the goal of the Act to prevent armed groups from benefitting from the sourcing of conflict minerals from the Democratic Republic of Congo and the covered countries. To achieve this goal, and to assist A&F in complying with its obligations under the Act, it is necessary that our suppliers investigate the source of any conflict minerals in the products they sell to us and avoid the purchase of conflict minerals from sources that benefit armed groups in the covered countries.

A&F expects all vendors and suppliers to:

- 1) Purchase materials from legitimate sources not involved in funding conflict;
- 2) Avoid the use of conflict minerals which may, directly or indirectly, finance or benefit armed groups in the Democratic Republic of the Congo or covered countries;
- 3) Confirm and verify that materials purchased are conflict-free, based on personal knowledge, reliable written representations and certifications, or other verifiable evidence provided by the supplier of items containing conflict minerals; and
- 4) Cooperate with A&F's "Due Diligence" process that was established by A&F to comply with the Act's conflict minerals provisions.

The Due Diligence Process

Due Diligence is a process in which A&F (with the cooperation of its vendors) must systematically gather information about its supply chain and report data pertaining to the source of its conflict minerals as required by the Act. A&F will follow the due diligence guidelines approved by the Organization for Economic Cooperation and Development (OECD), and will

have its process audited if and as required by the Act. A&F's Due Diligence process is summarized below.

Step 1 - A&F must determine if conflict minerals are used in its products and determine if the conflict minerals are necessary to the functionality or production of its products.

Step 2 - A&F, or a third party representing A&F, will contact and survey applicable vendors and attempt to determine the following:

- Whether conflict minerals are contained in and necessary for the functionality or production of products supplied to A&F.
- Whether the vendor can confirm that the necessary conflict minerals *did not* originate in the covered countries or are from scrap or recycled sources.
- The country of origin of the necessary conflict minerals including the identification of the smelter (when known).
- Whether the vendor has any reason to believe that the necessary conflict minerals originated in the covered countries or may not be from scrap or recycled sources.

Step 3- Vendors should be prepared to fully answer the survey questions from Step 2. In the event the vendor does not know how to respond, A&F, or a third party representing A&F, will help the vendor gather the information from the appropriate upstream suppliers (i.e. its suppliers and the smelter). In this case, a minimum of three (3) attempts to contact upstream suppliers will be made. If such efforts are unsuccessful, A&F Sourcing will contact the vendor to determine the next course of action.

Step 4- A&F, or a third party representing A&F, will review and attempt to verify the information and documentation supplied by the vendor.

Step 5- A&F will generate a Conflict Minerals Report if and as required by the Act. In the report, the results of the vendor survey will be disclosed. (Note: The names and locations of our vendors will remain confidential.)

Step 6- A&F is required to publish the results of its due diligence and any Conflict Minerals Report required by the Act on A&F's Website.

The "Due Diligence" process will occur on an annual basis.