



CONFLICT MINERALS POLICY

As set forth in the Company's policy on Human Rights, Disney recognizes that we have an opportunity to promote human rights where we can make a positive contribution and to operate in compliance with all applicable laws wherever we do business. That responsibility includes compliance with the provisions of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("the Act"), which aims to prevent the use of certain minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo and adjoining countries ("covered countries"). The minerals impacted are defined as (A) columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.

Disney does not directly purchase raw conflict minerals for products it sells. Disney, and suppliers of products manufactured for Disney, are removed from the smelters that produce conflict minerals by many tiers in the supply chain. As a downstream distributor of products that may contain conflict minerals, Disney is taking the following steps to comply with the Security and Exchange Commissions' (SEC) final rule on Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Final Rule"):

We have a governance structure to implement this conflict minerals policy, including a team that carries out the compliance program and an executive steering committee to provide oversight and guidance, as necessary;

We engage with suppliers of products we sell regarding implementation of this policy, including seeking information from them regarding the origin and traceability of minerals in our products and providing educational materials to them regarding means to promote increased transparency;

We follow due diligence measures in line with the Organisation for Economic Co-Operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals From Conflict-Affected and High-Risk Areas;

We prepare reports required by the Final Rule; and

We continue to monitor developments relating to conflict minerals and our practices



relative to those developments with an eye to enhancing systems for compliance with the Final Rule.

Interested parties can report concerns or ask questions regarding this policy by sending an email to conflict.minerals@disney.com.

[Our 2018 Conflict Minerals report can be found here.](#)