

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549**

**FORM SD**

**SPECIALIZED DISCLOSURE REPORT**

**American Eagle Outfitters, Inc.**

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(Exact name of the registrant as specified in its charter)

Delaware

1-33338

13-2721761

(State or other jurisdiction of  
incorporation or organization)

(Commission  
File Number)

(IRS Employer  
Identification No)

77 Hot Metal Street, Pittsburgh, Pennsylvania

15203-2329

(Address of principal executive offices)

(Zip code)

Beth Henke

412-432-3300

(Name and telephone number, including area code, of the  
person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

☒ Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2024.

## **Section 1 - Conflict Minerals Disclosures**

### **Item 1.01 Conflict Minerals Disclosure and Report**

American Eagle Outfitters, Inc. (the “Company”) has determined that it contracts to manufacture certain products for which gold, tantalum, tin and tungsten (“3TG minerals”) are necessary to functionality or production. The Company has conducted a “reasonable country of origin inquiry” (“RCOI”) and subsequent due diligence as required by the Dodd-Frank Wall Street Reform and Consumer Protection Act.

#### **Conflict Minerals Disclosure**

In accordance with Rule 13p-1 under the Securities Exchange Act of 1934 (“Rule 13p-1,”) the Company has filed this Specialized Disclosure Form (“Form SD”) and the associated Conflict Minerals Report, and both reports are posted to a publicly available Internet site at <https://www.aeo-inc.com/responsible-sourcing>.

The Company engaged Assent Compliance to assist it in conducting its RCOI and to assist with its due diligence efforts. To implement the RCOI, the Company’s suppliers were engaged to collect information regarding the presence and sourcing of 3TG minerals used in the products supplied to the Company. This program utilized the Responsible Business Alliance (“RBA”) and Global e-Sustainability Initiative (“GeSI”) Conflict Minerals Reporting Template (“CMRT”) version 6.31 or higher for data collection. Information was collected and stored using an online platform provided by Assent Compliance.

The Company undertook a due diligence process based on the Organization for Economic Cooperation and Development’s (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and accompanying Supplements to determine the source and chain of custody of the 3TG minerals used in its products. A more detailed description of the due diligence measures the Company took is provided in the Conflict Minerals Report attached hereto as Exhibit 1.01.

Based upon its RCOI and due diligence efforts, the Company has determined that its products could contain 3TG minerals that may have originated in the covered countries. Despite having conducted a good faith RCOI and due diligence efforts, the Company has been unable to determine the origin of all of the 3TG minerals used in its products.

#### **Item 1.02 Exhibits**

The Company’s Conflict Minerals Report is attached hereto as Exhibit 1.01.

## SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

The Company

/s/ Beth Henke

May 30, 2025

By

(Date)

Beth Henke, Senior Vice President –General Counsel, Chief Compliance Officer

Name and Title (printed)

**Conflict Minerals Report of American Eagle Outfitters, Inc.  
In accord with Rule 13p-1 under the Securities Exchange Act of 1934**

This is the Conflict Minerals Report of American Eagle Outfitters, Inc. (“The Company”) for calendar year 2024 in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 (“Rule 13p-1”). The intent of this Conflict Minerals Report (“CMR”) is to describe the Company’s due diligence process following Rule 13p-1 requirements.

**1. Design of Due Diligence Measures**

The Company’s due diligence process is based on the Organization for Economic Cooperation and Development’s (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and accompanying Supplements. The Company engaged Assent Compliance, a third-party service provider, to assist in designing and implementing due diligence measures, including supply chain scoping, supplier engagement, data collection and reporting.

**2. Due Diligence Measures Implemented**

The Company took the following Due Diligence measures:

*Adopt a conflict minerals policy*

The Company’s conflict minerals policy is publicly available at <https://www.aeo-inc.com/responsible-sourcing>, under the Key Sourcing Policies section. It states:

**POLICY ON CONFLICT MINERALS LAW COMPLIANCE**

**I. SCOPE**

This policy applies to all American Eagle Outfitters, Inc. (“AEO”) suppliers of branded and co-branded products.

**II. BACKGROUND**

AEO is committed to ensuring that metals and other minerals contained in its branded and co-branded products are obtained, produced and used in an environmentally and socially responsible manner.

Under the “conflict minerals” provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act, AEO is required to conduct due diligence regarding its use of four metals: gold, columbite-tantalite (tantalum), cassiterite (tin) and wolframite (tungsten) (collectively, the “Conflict Minerals”) and whether those Conflict Minerals originated in the Democratic Republic of Congo or adjoining countries<sup>1</sup> (collectively, the “Covered Countries.”) The goal of these regulations is to end the violent conflict in the region, which has been partially financed by the exploitation and trade of Conflict Minerals originating in the Covered Countries. As a publicly traded company, AEO is required to request certain information

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<sup>1</sup> Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia

from its suppliers and report on its inquiries and due diligence to the U.S. Securities and Exchange Commission.

### III. POLICY

Each AEO Supplier will be required to provide information each year regarding the origin of any Conflict Minerals that are necessary to the functionality or production of AEO products. This inquiry should be reasonably designed to determine whether any such minerals originated in the Covered Countries or are from recycled or scrap sources. The required information will be collected by AEO via a survey, which will be facilitated by a third party company.

Verification efforts will be led by AEO and/or a designated third party company who will also be available to assist suppliers in their efforts to ensure that AEO products are Conflict Minerals free.

**AEO does not ban the use of minerals that originate in the Covered Countries. However, suppliers must be able to show proof that the minerals can be traced back to registered conflict-free smelters.**

In the event that our suppliers have a reason to believe that Conflict Minerals used in AEO products may have originated in the Covered Countries, we will assist in performing due diligence on our supply chain in a manner consistent with the guidance issued by the Organization for Economic Cooperation and Development (“OECD”) to ensure that they are Conflict Minerals free.

For more information on the OECD guidelines, please visit <https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>.

#### *Assemble an internal team to support supply chain due diligence*

The management of our Conflict Minerals policy lies within our Responsible Sourcing department. The Responsible Sourcing team worked closely with Assent Compliance to design and implement the diligence activities surrounding our minerals supply chain. Additional oversight and input was provided by our Conflict Minerals cross-functional team, which includes representatives from our Finance, Legal, and Internal Audit departments.

#### *Establish a system of controls and transparency over the mineral supply chain*

To provide transparency within the Company’s mineral supply chains and to facilitate communication of policies and expectations, the Company engaged Assent Compliance to complement internal management processes. Assent Compliance’s online system is used to identify suppliers in our mineral supply chains and the relationships between them, collect, store and review information on 3TG mineral sourcing practices, track information on smelters and refiners (“SORs”), and flag risks based on SOR sourcing practices. This system utilized the Conflict Minerals Reporting Template (“CMRT”) 6.31 or higher for data collection. This system is designed to allow collection and storage of data on supply chain circumstances, which can be updated to reflect changing realities within the supply chain, such as new customer-supplier relationships, new products, etc.

Assent Compliance helped us to engage with our manufacturing suppliers as part of its Conflict Minerals management system. Engagement consisted of multiple communication outreaches to educate suppliers on our expectations for sourcing and Conflict Minerals policy, and the SEC Rule 13p-1 rule requirements.

Supplier engagement followed these steps:

- 1) All applicable tier 1 apparel and non-apparel suppliers that shipped product to AEO during the 2024 calendar year were included in the supplier engagement process. Contact information for in-scope suppliers was provided to Assent for upload into their online platform.
- 2) Assent requested that the suppliers complete a CMRT. Suppliers are able to leverage Assent's team of supplier support specialists to ensure they receive appropriate support and understand how to properly file a CMRT. Assent monitored and tracked all communications for future reporting and transparency.
- 3) Suppliers that responded as being out of scope of the reporting requirements were removed from the survey process upon review.
- 4) Non-responsive suppliers were contacted a minimum of 3 times. If the supplier remained unresponsive, then additional communication attempts were conducted in order to determine why a response was not provided and to offer assistance in completing the request.

Supplier responses were evaluated for plausibility, consistency, and gaps both in terms of which products were stated to contain or not contain necessary 3TG minerals, as well as the origin of those materials. Additional supplier outreach was conducted to address issues including implausible statements regarding no presence of 3TG minerals, incomplete data on CMRTs, responses that did not identify smelters or refiners, responses which indicated sourcing location without complete supporting information from the supply chain, and organizations that were identified as smelter or refiners, but not verified as such through further analysis and research.

A total of 135 suppliers were identified through the filtering procedures described above as being in-scope for conflict mineral regulatory purposes and were contacted by Assent as part of the "reasonable country of origin inquiry" ("RCOI") process. The survey response rate among these suppliers was 78%. 10 suppliers responded yes as to having one or more of the 3TG minerals as necessary to the functionality or production of the products they produce. The Company has not received sufficient additional information from the responding suppliers to determine the origin of all of their 3TG minerals. We will continue our due diligence efforts in this regard.

SORs were matched against the Responsible Minerals Initiative's (RMI) Standard Smelter List. SORs sourcing practices and "conflict-free" sourcing statuses were cross-referenced with the RMI's Responsible Minerals Assurance Process ("RMAP"), which includes cross-recognized programs with the London Bullion Market Association ("LBMA") Good Delivery Program and the Responsible Jewelry Council Chain of Custody Certification.

Since most of the CMRTs we received from our suppliers were made on a company level, rather than on a product or user-defined scope, we are not able to identify which smelters or refiners listed on Appendix A actually processed the 3TGs contained in our products. Therefore, our list of processing smelters and refiners disclosed in Appendix A may contain more facilities than those that actually processed the conflict minerals contained in our products.

Set forth below is the list of SORs identified in our supply chain so far and their conflict-free status\*:

## Appendix A

<b>Metal</b>	<b>Smelter Name</b>	<b>Smelter ID</b>	<b>RMI Audit Status</b>
Tungsten	A.L.M.T. Corp.	CID000004	Conformant
Gold	Advanced Chemical Company	CID000015	Conformant
Gold	Aida Chemical Industries Co., Ltd.	CID000019	Conformant
Gold	Agosi AG	CID000035	Conformant
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	CID000041	Conformant
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	CID000058	Conformant
Gold	Argor-Heraeus S.A.	CID000077	Conformant
Gold	Asahi Pretec Corp.	CID000082	Conformant
Gold	Asaka Riken Co., Ltd.	CID000090	Conformant
Tungsten	Kennametal Huntsville	CID000105	Conformant
Gold	Aurubis AG	CID000113	Conformant
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	CID000128	Conformant
Gold	Boliden Ronnskar	CID000157	Conformant
Gold	C. Hafner GmbH + Co. KG	CID000176	Conformant
Gold	CCR Refinery - Glencore Canada Corporation	CID000185	Conformant
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CID000211	Conformant
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CID000218	Conformant
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CID000228	Conformant
Gold	Chimet S.p.A.	CID000233	Conformant
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CID000258	Conformant
Gold	Chugai Mining	CID000264	Conformant
Tin	Alpha	CID000292	Conformant
Tin	PT Aries Kencana Sejahtera	CID000309	Conformant
Tin	PT Premium Tin Indonesia	CID000313	Conformant
Gold	DSC (Do Sung Corporation)	CID000359	Conformant
Gold	Dowa	CID000401	Conformant
Tin	Dowa	CID000402	Conformant
Gold	Eco-System Recycling Co., Ltd. East Plant	CID000425	Conformant
Tin	EM Vinto	CID000438	Conformant
Tin	Estanho de Rondonia S.A.	CID000448	Conformant
Tantalum	F&X Electro-Materials Ltd.	CID000460	Conformant
Tin	Fenix Metals	CID000468	Conformant
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CID000538	Conformant
Tungsten	Global Tungsten & Powders LLC	CID000568	Conformant
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CID000616	Conformant
Gold	LT Metal Ltd.	CID000689	Conformant
Gold	Heimerle + Meule GmbH	CID000694	Conformant
Gold	Heraeus Metals Hong Kong Ltd.	CID000707	Conformant

Gold	Heraeus Germany GmbH Co. KG	CID000711	Conformant
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CID000766	Conformant
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CID000801	Conformant
Gold	Ishifuku Metal Industry Co., Ltd.	CID000807	Conformant
Gold	Istanbul Gold Refinery	CID000814	Conformant
Gold	Japan Mint	CID000823	Conformant
Tungsten	Japan New Metals Co., Ltd.	CID000825	Conformant
Gold	Jiangxi Copper Co., Ltd.	CID000855	Conformant
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CID000914	Conformant
Tantalum	Jiujiang Tanbre Co., Ltd.	CID000917	Conformant
Gold	Asahi Refining USA Inc.	CID000920	Conformant
Gold	Asahi Refining Canada Ltd.	CID000924	Conformant
Gold	JX Nippon Mining & Metals Co., Ltd.	CID000937	Conformant
Gold	Kazzinc	CID000957	Conformant
Tungsten	Kennametal Fallon	CID000966	Conformant
Gold	Kennecott Utah Copper LLC	CID000969	Conformant
Gold	Kojima Chemicals Co., Ltd.	CID000981	Conformant
Tin	China Tin Group Co., Ltd.	CID001070	Conformant
Tantalum	AMG Brasil	CID001076	Conformant
Gold	LS MnM Inc.	CID001078	Conformant
Tin	Malaysia Smelting Corporation (MSC)	CID001105	Conformant
Gold	Materion	CID001113	Conformant
Gold	Matsuda Sangyo Co., Ltd.	CID001119	Conformant
Tin	Metallic Resources, Inc.	CID001142	Conformant
Gold	Metalor Technologies (Suzhou) Ltd.	CID001147	Conformant
Gold	Metalor Technologies (Hong Kong) Ltd.	CID001149	Conformant
Gold	Metalor Technologies (Singapore) Pte., Ltd.	CID001152	Conformant
Gold	Metalor Technologies S.A.	CID001153	Conformant
Gold	Metalor USA Refining Corporation	CID001157	Conformant
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	CID001161	Conformant
Tantalum	Metallurgical Products India Pvt., Ltd.	CID001163	Conformant
Tin	Mineracao Taboca S.A.	CID001173	Conformant
Tantalum	Mineracao Taboca S.A.	CID001175	Conformant
Tin	Minsur	CID001182	Conformant
Gold	Mitsubishi Materials Corporation	CID001188	Conformant
Tin	Mitsubishi Materials Corporation	CID001191	Conformant
Tantalum	Mitsui Mining and Smelting Co., Ltd.	CID001192	Conformant
Gold	Mitsui Mining and Smelting Co., Ltd.	CID001193	Conformant
Tantalum	NPM Silmet AS	CID001200	Conformant
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	CID001220	Conformant
Tin	Jiangxi New Nanshan Technology Ltd.	CID001231	Conformant



Gold	Navoi Mining and Metallurgical Combinat	CID001236	Conformant
Gold	Nihon Material Co., Ltd.	CID001259	Conformant
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CID001277	Conformant
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	CID001314	Conformant
Gold	Ohura Precious Metal Industry Co., Ltd.	CID001325	Conformant
Tin	Operaciones Metalurgicas S.A.	CID001337	Conformant
Gold	MKS PAMP SA	CID001352	Conformant
Gold	PT Aneka Tambang (Persero) Tbk	CID001397	Conformant
Tin	PT Artha Cipta Langgeng	CID001399	Conformant
Tin	PT Babel Inti Perkasa	CID001402	Conformant
Tin	PT Babel Surya Alam Lestari	CID001406	Conformant
Tin	PT Belitung Industri Sejahtera	CID001421	Conformant
Tin	PT Bukit Timah	CID001428	Conformant
Tin	PT Mitra Stania Prima	CID001453	Conformant
Tin	PT Prima Timah Utama	CID001458	Conformant
Tin	PT Refined Bangka Tin	CID001460	Conformant
Tin	PT Sariwiguna Binasentosa	CID001463	Conformant
Tin	PT Stanindo Inti Perkasa	CID001468	Conformant
Tin	PT Timah Tbk Kundur	CID001477	Conformant
Tin	PT Timah Tbk Mentok	CID001482	Conformant
Tin	PT Tinindo Inter Nusa	CID001490	Conformant
Tin	PT Tommy Utama	CID001493	Conformant
Gold	PX Precinox S.A.	CID001498	Conformant
Tantalum	QuantumClean	CID001508	Conformant
Gold	Rand Refinery (Pty) Ltd.	CID001512	Conformant
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CID001522	Conformant
Gold	Royal Canadian Mint	CID001534	Conformant
Tin	Rui Da Hung	CID001539	Conformant
Gold	SEMPA Joyeria Plateria S.A.	CID001585	Conformant
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CID001622	Conformant
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CID001736	Conformant
Tin	Soft Metais Ltda.	CID001758	Conformant
Gold	Solar Applied Materials Technology Corp.	CID001761	Conformant
Gold	Sumitomo Metal Mining Co., Ltd.	CID001798	Conformant
Tantalum	Taki Chemical Co., Ltd.	CID001869	Conformant
Gold	Tanaka Kikinzoku Kogyo K.K.	CID001875	Conformant
Tantalum	Telex Metals	CID001891	Conformant
Tin	Thaisarco	CID001898	Conformant
Gold	Shandong Gold Smelting Co., Ltd.	CID001916	Conformant
Gold	Tokuriki Honten Co., Ltd.	CID001938	Conformant

Gold	Torecom	CID001955	Non Conformant
Tantalum	Ulba Metallurgical Plant JSC	CID001969	Conformant
Gold	Umicore S.A. Business Unit Precious Metals Refining	CID001980	Conformant
Gold	United Precious Metal Refining, Inc.	CID001993	Conformant
Gold	Valcambi S.A.	CID002003	Conformant
Gold	Western Australian Mint (T/a The Perth Mint)	CID002030	Conformant
Tin	White Solder Metalurgia e Mineracao Ltda.	CID002036	Conformant
Tungsten	Wolfram Bergbau und Hutten AG	CID002044	Conformant
Tungsten	Xiamen Tungsten Co., Ltd.	CID002082	Conformant
Gold	Yamakin Co., Ltd.	CID002100	Conformant
Gold	Yokohama Metal Co., Ltd.	CID002129	Conformant
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CID002158	Conformant
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CID002180	Conformant
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CID002224	Conformant
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CID002243	Conformant
Gold	SAFINA A.S.	CID002290	Conformant
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CID002315	Conformant
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CID002316	Conformant
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CID002317	Conformant
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CID002318	Conformant
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CID002319	Conformant
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CID002320	Conformant
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CID002321	Conformant
Tin	CV Venus Inti Perkasa	CID002455	Conformant
Tin	Magnu's Minerais Metais e Ligas Ltda.	CID002468	Conformant
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CID002492	Conformant
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CID002494	Conformant
Tungsten	Asia Tungsten Products Vietnam Ltd.	CID002502	Conformant
Tin	PT ATD Makmur Mandiri Jaya	CID002503	Conformant
Tantalum	D Block Metals, LLC	CID002504	Conformant
Tantalum	FIR Metals & Resource Ltd.	CID002505	Conformant
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CID002506	Conformant
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CID002508	Conformant
Gold	MMTC-PAMP India Pvt., Ltd.	CID002509	Conformant
Gold	KGHM Polska Miedz Spolka Akcyjna	CID002511	Conformant
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CID002512	Conformant
Tungsten	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch	CID002513	Conformant
Tin	O.M. Manufacturing Philippines, Inc.	CID002517	Conformant
Tantalum	KEMET de Mexico	CID002539	Conformant

Tungsten	H.C. Starck Tungsten GmbH	CID002541	Conformant
Tungsten	TANIOBIS Smelting GmbH & Co. KG	CID002542	Conformant
Tungsten	Masan High-Tech Materials	CID002543	Conformant
Tantalum	TANIOBIS Co., Ltd.	CID002544	Conformant
Tantalum	TANIOBIS GmbH	CID002545	Conformant
Tantalum	H.C. Starck Hermsdorf GmbH	CID002547	Not Applicable
Tantalum	Materion Newton Inc.	CID002548	Conformant
Tantalum	TANIOBIS Japan Co., Ltd.	CID002549	Conformant
Tantalum	TANIOBIS Smelting GmbH & Co. KG	CID002550	Conformant
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CID002551	Conformant
Tantalum	Global Advanced Metals Boyertown	CID002557	Conformant
Tantalum	Global Advanced Metals Aizu	CID002558	Conformant
Tin	CV Ayi Jaya	CID002570	Conformant
Gold	T.C.A S.p.A	CID002580	Conformant
Gold	REMONDIS PMR B.V.	CID002582	Conformant
Tungsten	Niagara Refining LLC	CID002589	Conformant
Tin	PT Rajehan Ariq	CID002593	Conformant
Gold	Korea Zinc Co., Ltd.	CID002605	Conformant
Gold	TOO Tau-Ken-Altyn	CID002615	Conformant
Tungsten	China Molybdenum Tungsten Co., Ltd.	CID002641	Conformant
Tin	PT Cipta Persada Mulia	CID002696	Conformant
Tin	Resind Industria e Comercio Ltda.	CID002706	Conformant
Tantalum	Resind Industria e Comercio Ltda.	CID002707	Conformant
Gold	Abington Reldan Metals, LLC	CID002708	Conformant
Tin	Super Ligas	CID002756	Conformant
Gold	L'Orfebre S.A.	CID002762	Non Conformant
Gold	Italpreziosi	CID002765	Conformant
Tin	Aurubis Beerse	CID002773	Conformant
Tin	Aurubis Berango	CID002774	Conformant
Tin	PT Bangka Prima Tin	CID002776	Conformant
Gold	WIELAND Edelmetalle GmbH	CID002778	Conformant
Gold	Ogussa Österreichische Gold- und Silber-Scheideanstalt GmbH	CID002779	Active
Tin	PT Sukses Inti Makmur	CID002816	Conformant
Tungsten	Philippine Chuangxin Industrial Co., Inc.	CID002827	Conformant
Tin	PT Menara Cipta Mulia	CID002835	Conformant
Tantalum	Jiangxi Tuohong New Raw Material	CID002842	Conformant
Tin	HuiChang Hill Tin Industry Co., Ltd.	CID002844	Conformant
Gold	Bangalore Refinery	CID002863	Active
Gold	SungEel HiMetal Co., Ltd.	CID002918	Conformant

Gold	Planta Recuperadora de Metales SpA	CID002919	Conformant
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CID003116	Conformant
Gold	NH Recytech Company	CID003189	Conformant
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CID003190	Conformant
Tin	PT Bangka Serumpun	CID003205	Conformant
Tin	Tin Technology & Refining	CID003325	Conformant
Tin	PT Rajawali Rimba Perkasa	CID003381	Conformant
Tin	Luna Smelter, Ltd.	CID003387	Conformant
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CID003397	Conformant
Tungsten	Lianyou Metals Co., Ltd.	CID003407	Conformant
Tin	Precious Minerals and Smelting Limited	CID003409	Non Conformant
Tungsten	Hubei Green Tungsten Co., Ltd.	CID003417	Conformant
Gold	Eco-System Recycling Co., Ltd. North Plant	CID003424	Conformant
Gold	Eco-System Recycling Co., Ltd. West Plant	CID003425	Conformant
Tin	PT Mitra Sukses Globalindo	CID003449	Conformant
Tungsten	Cronimet Brasil Ltda	CID003468	Conformant
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	CID003486	Conformant
Tin	CRM Synergies	CID003524	Conformant
Gold	Metal Concentrators SA (Pty) Ltd.	CID003575	Conformant
Tin	Fabrica Auricchio Industria e Comercio Ltda.	CID003582	Non Conformant
Tantalum	RFH Yancheng JinYE New Material Technology Co., Ltd.	CID003583	Conformant
Tungsten	Fujian Xinlu Tungsten Co., Ltd.	CID003609	Conformant
Gold	Gold by Gold Colombia	CID003641	Conformant
Tin	DS Myanmar	CID003831	Conformant
Tin	PT Putera Sarana Shakti (PT PSS)	CID003868	Conformant
Tin	Mining Minerals Resources SARL	CID004065	Conformant
Tin	Takehara PVD Materials Plant / PVD Materials Division of MITSUI MINING & SMELTING CO., LTD.	CID004403	Conformant
Tin	Malaysia Smelting Corporation Berhad (Port Klang)	CID004434	Conformant
Tin	Woodcross Smelting Company Limited	CID004724	Conformant
Gold	Umicore S.A. Business Unit Precious Metals Refining	CID001980	Conformant
Tin	PT Timah Tbk Mentok	CID001482	Conformant
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CID002180	Conformant
Gold	Metalor Technologies S.A.	CID001153	Conformant
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CID002180	Conformant
Gold	Metalor Technologies S.A.	CID001153	Conformant
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CID002180	Conformant
Gold	Metalor Technologies S.A.	CID001153	Conformant
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CID002180	Conformant

Tin	Jiangxi New Nanshan Technology Ltd.	CID001231	Conformant
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CID003116	Conformant
Gold	Jiangxi Copper Co., Ltd.	CID000855	Conformant
Tin	China Tin Group Co., Ltd.	CID001070	Conformant
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CID001622	Conformant
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CID001908	Non Conformant
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CID002180	Conformant
Gold	Metalor Technologies (Hong Kong) Ltd.	CID001149	Conformant
Gold	Metalor Technologies S.A.	CID001153	Conformant
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CID002158	Conformant
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CID002180	Conformant
Gold	Guangdong Jinding Gold Limited	CID002312	Outreach Required

\* Conflict-free status refers to the facility's RMI audit status. Smelters that are Conformant to RMAP assessment protocols are considered DRC conflict-free. Factories that are not listed as "Conformant" are included in extra due diligence outreach steps throughout the program timeline. These designations are current as of May 30, 2025.

#### *Report findings to senior management*

All supply chain assessment findings are reported to American Eagle Outfitters' EVP - Chief Supply Chain Officer

#### *Devise and adopt a risk management plan*

In addition to the system of controls previously described in this report, we have put in place several procedures to help mitigate the risk of Conflict Minerals entering our supply chain. First, our Conflict Minerals policy is listed in our Corporate Vendor Manual, which our suppliers agree to adhere to when they sign our master purchase agreement. The master purchase agreement is required of each supplier before any production can begin. The Corporate Vendor Manual is available to our suppliers through our Bamboo Rose sourcing system and is updated on a semi-annual basis.

Our suppliers are further reminded of this policy through emails from the Company and through the suppliers' interaction with Assent Compliance.

In the event that 3TG minerals used in AEO products have been sourced in the DRC or surrounding areas, we work with the supplier to ensure that the minerals are sourced from registered conflict free smelters or are eliminated from use.

### **3. Steps to Improve Due Diligence**

The Company will endeavor to continuously improve upon its supply chain due diligence efforts via the following measures:

- Continue to compare RCOI results to information collected via independent conflict free smelter validation programs such as RMI's Responsible Minerals Assurance Process ("RMAP"); and
- Contact smelters identified as a result of the RCOI process and request their participation in obtaining a "conflict free" designation from an industry program such as the RMAP audit program.

#### **4. Product Determination**

Based upon its RCOI and due diligence efforts, the Company has been unable to determine the origin of all of the 3TG minerals used in its products.