

Form **8937**
(December 2017)
Department of the Treasury
Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name <u>GameStop Corp.</u>			2 Issuer's employer identification number (EIN) <u>20-2733559</u>		
3 Name of contact for additional information <u>Mark Robinson</u>		4 Telephone No. of contact <u>(817) 424-2001</u>		5 Email address of contact <u>legal@gamestop.com</u>	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact <u>625 Westport Parkway</u>			7 City, town, or post office, state, and ZIP code of contact <u>Grapevine, TX 76051</u>		
8 Date of action <u>July 21, 2022</u>		9 Classification and description <u>Class A Common Stock</u>			
10 CUSIP number <u>36467W109</u>	11 Serial number(s)	12 Ticker symbol <u>GME</u>	13 Account number(s)		

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 July 5, 2022, the board of directors of GameStop Corp. ("GME") approved a 4:1 stock split to be distributed as a stock dividend (the "Distribution"). The Distribution was made on July 21, 2022 to GME shareholders of record as of July 18, 2022 (the "Record Date"). Each GME shareholder received three additional shares of GME Class A Common Stock ("New GME Shares") for each share of GME Class A Common Stock ("Existing GME Share") held by such shareholder at the Record Date. No cash was paid in lieu of fractional shares.

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 Distribution is intended to be treated as a non-taxable transaction for U.S. federal income tax purposes pursuant to Internal Revenue Code ("IRC") Section 305(a). Accordingly, pursuant to IRC Section 307(a), the tax basis of the New GME Shares and each Existing GME Share with respect to which the Distribution occurred should be determined by allocating the basis in the Existing GME Share pro rata among the Existing GME Share and the New GME Shares (i.e., the adjusted tax basis in each Existing GME Share and each of the New GME Shares owned after the Distribution should be calculated by dividing the adjusted tax basis in the Existing GME Share held prior to the Distribution by four). See illustration on Line 16. The Distribution does not change the aggregate tax basis of each shareholder's investment in GME Class A Common stock. Shareholders should consult their own tax advisor regarding their specific tax treatment of the Distribution.

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 basis adjustment described on Line 15 may be illustrated as follows: Before the Distribution, a shareholder holds 100 shares of GME stock that were purchased on the same date for \$100 per share. The shareholder's aggregate adjusted tax basis in those shares is \$10,000 (i.e., 100 shares multiplied by \$100). After the Distribution, the shareholder would have received 300 additional GME shares for a total of 400 shares of GME Class A Common Stock. The shareholder's aggregate adjusted tax basis in the 400 shares remains \$10,000, but the basis per share is now \$25 (i.e., \$10,000 divided by 400 shares). Note that where lots of shares held prior to the Distribution were acquired at different times or for different prices, the basis allocation should be done based on such lots.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ The applicable Internal Revenue Code sections upon which the tax treatment is based are Sections 305(a) and 307(a).

18 Can any resulting loss be recognized? ▶ No loss may be recognized in connection with the Distribution.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The basis adjustments should be taken into account in the tax year of the shareholder during which the Distribution occurred (i.e., 2022 for a calendar year taxpayer).

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.

Sign Here
Signature ▶  Date ▶ 7/23/2022
Print your name ▶ Daniel Moore Title ▶ Vice President, Global Tax

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.