



Conflict Minerals Policy

Boot Barn Holdings, Inc. is committed to ensuring compliance with Section 1502 of the United States Dodd-Frank Wall Street Reform and Consumer Protection Act relating to conflict minerals.

The conflict minerals law is intended to deter the violence and human rights abuses perpetrated by groups operating in the Democratic Republic of Congo (DRC) and adjoining countries, which control the mining and transportation of conflict minerals including columbite-tantalite (tantalum), wolframite (tungsten), cassiterite (tin), and gold (collectively, the "3TG"). Armed groups controlling local mines containing 3TG are suspected of using mining proceeds to fund regional conflicts, and some of these minerals can make their way into the supply chains of products used around the world, including those in the retail industry. Therefore, the law requires publicly traded companies to report to the U.S. Securities and Exchange Commission (SEC) and disclose on their website whether the defined conflict minerals are necessary to the functionality or production of products they manufacture or contract to manufacture and, if so, whether those conflict minerals originate from conflict mines in the DRC or neighboring countries.

Boot Barn Holdings, Inc. expects our suppliers to have policies and due diligence measures in place that reasonably assure us that products and materials supplied to us containing conflict minerals are DRC conflict free. Boot Barn Holdings, Inc. and its customers are collaborating with the Electronics Industry Citizenship Coalition (EICC) and the Conflict Free Sourcing Initiative (CFSI) to address this topic and expect compliance with supply chain responsibility expectations.

In order to ensure compliance with the law, Boot Barn Holdings, Inc. will:

- Follow the Organization for Economic Cooperation and Development (OECD) framework to incorporate proper due diligence measures into our supply chain regarding trade in conflict minerals.
- Adopt conflict minerals due diligence policies and management systems to reasonably assure the country of origin of tantalum, tungsten, tin and gold in our products and require its suppliers to adopt similar policies and systems.
- Commit to transparency in the implementation of this policy by making the Company's progress report available to relevant stakeholders and the public.

Boot Barn Holdings, Inc. shares concern for the responsible sourcing of materials and continues to make progress towards the common goal of ethically sourced minerals and socially responsible supply chains.

Concerns regarding this policy or any violations can be reported as follows:

By email to the following address:

vendorcompliance@bootbarn.com

By mail to the following address:

*Boot Barn Holdings, Inc.
15345 Barranca Parkway
Irvine, CA 92618*

Adopted: May 2017