

## **Corporate Social Responsibility Policy of Barnes & Noble Education, Inc.**

Operating in a responsible and sustainable environment is important to Barnes & Noble Education, Inc. (“BNED”). Not only do we act as a trusted partner to the many colleges and universities we serve, we partner with various other constituencies such as marketing partners and vendors while remaining accountable to our shareholders. We view corporate responsibility as a commitment that helps us be better corporate citizens and manage risks and maximize on the opportunities available to us in a changing industry. Our Corporate Governance Policies including this Corporate Social Responsibility Policy are intended to provide a framework for the sound and responsible governance of BNED and adherence to our policies and related procedures is the responsibility of every BNED Director, Officer and Employee.

We are committed to understanding and managing our social, environmental and economic impact to enable us to contribute to society’s wider goal of responsible corporate actions, sustainable development including green thinking with respect to technology, supporting human rights and fair labor, and corporate giving back. This commitment is deeply entrenched in our culture and core values as we demonstrate these responsibilities through our actions.

At BNED, we define Corporate Social Responsibility to include:

- Conducting business in a socially responsible and ethical manner;
- Protecting the environment and the safety of people;
- Supporting human rights and prohibiting discrimination; and
- Supporting and giving back to the communities we serve.

In alignment with our [Code of Business Conduct and Ethics](#), BNED strives to ensure that all matters of Corporate Social Responsibility are considered and supported in our operations and administrative matters and are consistent with BNED stakeholders’ best interests. BNED is committed to supporting Corporate Social Responsibility and recognizes that in doing so, we will add significant value for our shareholders.

We encourage all employees to adopt the Corporate Social Responsibility considerations described in this policy into their day-to-day work activities. BNED leaders are to act as role models by incorporating these considerations into decision-making in business activities. BNED leaders are to ensure that they effectively identify and manage Corporate Social Responsibility issues and performance relevant to our business.

This Policy relates to the following areas that reflect existing and emerging standards of BNED’s Corporate Social Responsibility:

### **Conducting Business in a Socially Responsible and Ethical Manner in Compliance with our Code of Business Conduct**

BNED is committed to maintaining the highest standards of integrity and corporate governance practices in order to maintain excellence in its daily operations, and to promote confidence in its governance systems. BNED conducts its business in an open, honest, and ethical manner. BNED requires all employees to acknowledge compliance with its Code of Business Conduct and is committed to measuring, auditing and tracking the performance under its Code of Business Conduct.

BNED recognizes the importance of protecting all of our human, financial, physical, informational, social, environmental, and reputational assets.

BNED will work with partners, contractors, and suppliers to achieve consistency with this policy. BNED requires all vendors to follow our Vendor Code of Conduct, which includes standards regarding workplace conduct, principles of monitoring, and product quality and safety.

### **Ensuring the Safety of our People**

BNED is committed to protecting the health and safety of all individuals affected by our activities, including our employees, contractors, college and university partners, and the public.

BNED provides a safe and healthy working environment, and does not compromise the health and safety of any individual.

### **Protecting the Environment**

As a trusted partner at hundreds of college and university campuses nationwide, BNED remains committed to expanding our sustainability practices and integrating them into the programs and philosophy of each campus we serve. Our goal is to reduce and control accidents and mitigate impacts on the environment by working with our partners, peers and others to promote responsible environmental practices. Over the past few years, we have implemented many company-wide initiatives aimed at increasing our own sustainability efforts, such as decreasing paper usage by choosing to distribute more information digitally and transitioning to greener office supplies.

We collaborate to fulfill our school partners' green goals and vision. Our architects can help design LEED certified buildings. We work with manufacturers to recycle old fixtures and construction debris. Our low-impact store may feature:

- Recycled floor coverings
- Eco-friendly carpeting made with recycled content and low VOC
- Non-toxic, zero VOC paint
- Mercury-free fluorescent lights
- Eco-friendly merchandising fixtures made with recycled particleboard and non-toxic glues

Technology is crucial to our everyday operations. It also offers a unique opportunity to demonstrate our commitment to green thinking. BNED has replaced more than 90% of our older desktop computers with newer, more energy efficient models and migrated the majority of our enterprise servers to blade technology to reduce power consumption and cooling requirements.

BNED has partnered with Future Tech Enterprises and Guardian Data, nationwide leaders in technology services, to dispose of obsolete or end-of-life computers, peripherals and equipment. Meeting the stringent requirements of the U.S. Department of Defense, Future Tech's National EPA-Compliant, Non-Landfill Recycling program is recognized as the most effective, secure and environmentally safe asset recycling and disposal service. Bonded and certified technicians perform a 3, 4, or 7-pass DOD overwrite and issue a Certificate of Destruction confirming data has been removed.

BNED uses server virtualization allowing for greater utilization of existing resources. Virtualized servers reduce energy consumption in real time and support the green movement in a significant way.

Our data centers are designed as a dark room to dramatically reduce energy consumption without sacrificing reliability or service levels. By enabling smart power management features and turning off unused servers, BNED is able to increase reliability and uptime by reducing stresses on data center power and cooling systems. Additionally, our data centers are configured for industry standard hot-aisle / cold-

aisle configurations, which helps to reduce our overall operating costs and carbon footprint.

As part of ongoing technological improvements, Barnes & Noble College is converting to an EDI-based (Electronic Data Interchange) environment for ordering, invoice receipt and payment. EDI transactions create a streamlined, paperless, and environmentally friendly process that allows for more accurate and efficient ordering and receiving, as well as expedited processing of invoices.

### **Prohibiting Discrimination**

We do not engage in or tolerate unlawful workplace conduct, including discrimination, intimidation, or harassment. BNED treats every employee with dignity and respect, and we prohibit harassing or discriminatory conduct in the workplace, whether based upon age, race, color, ancestry, national origin, citizenship status, military or veteran status, religion, creed, disability, sex, sexual orientation, marital status, genetic information, gender identity and expression, or any other unlawful basis, including sexual harassment, regardless of whether it is committed by supervisory or non-supervisory personnel or any other third party.

BNED requires all employees to complete workplace harassment prevention training, and employees can report any harassing or discriminatory conduct and make anonymous complaints using the Talk2Us Hotline at 844-934-3232.

### **Supporting Human Rights**

As a supplier to customers nationwide, BNED operates across a diverse range of cultures and markets. We are proud of our commitment to apply fair labor practices, while respecting the national and local laws of communities where we operate and are committed to providing equal opportunity in all aspects of employment.

Barnes & Noble College is a member of the Fair Labor Association (FLA). We require all vendors who supply products to our stores to adopt the FLA's Code of Conduct. This requires strict adherence to workers' rights, including:

- No forced labor
- No child labor
- A workplace free of harassment and/or abuse
- No discrimination
- A safe and healthy working environment
- Respect for the workers' right to freedom of association and collective bargaining
- Proper compensation for overtime hours
- Paying workers wages and benefits in accordance with the law

Through our partnership with FLA, Barnes & Noble College, and all of our campus communities, can be assured that the products sold in our stores were not created using unfair labor practices. To achieve greater transparency, the majority of our vendor partners openly disclose on their websites the factories used to manufacture their products.

### **Supporting and Giving Back to the Communities we Serve**

BNED strives to understand and respect the local and cultural values in the communities where we serve. We actively support initiatives in those communities where we partner with our hundreds of colleges and universities. This commitment is visible in our contributions of financial and volunteer support, from

providing annual textbook scholarships to be awarded at the discretion of our partners, to supporting student clubs and organizations.

Each year, Barnes & Noble College donates surplus school supplies to the Kids in Need organization, which distributes merchandise to centers across the country. Local teachers can visit these centers to obtain free supplies for their needy students.

This Policy is monitored by the Chief Human Resources Officer with respect to employee and human resources matters and by the Vice President, Corporate Communications with respect to all other matters.

This Policy will be posted on BNED's website under the Investor Relations Tab and communicated to BNED's employees through the company newsletter and posted on the company portal.