

HELEN OF TROY CONFLICT MINERALS SOURCING POLICY

In 2010, Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act (“the Act”). Section 1502 of the Act requires public companies that manufacture products to determine whether their products contain “conflict minerals” and to identify the sources of these minerals in their products. Conflict minerals are defined as tantalum, tin, tungsten, gold (“3TG”), and any other minerals determined by the U.S. Secretary of State to be financing armed conflict in the Democratic Republic of Congo (“DRC”) and its adjoining countries. Section 1502 of the Act, and Rule 13p-1 adopted by the U.S. Securities and Exchange Commission, require public companies, like Helen of Troy, to disclose the due diligence procedures performed to identify conflict minerals in their supply chains. The purpose of this disclosure is to promote transparency regarding the use of conflict minerals in light of the growing international concern that the mining of these minerals funds armed conflict and contributes to human rights violations.

At Helen of Troy, we recognize our responsibility not to support the funding of armed conflict in the DRC. Our products contain minerals acquired from multiple sources worldwide, including 3TG. We expect our suppliers to have policies and due diligence measures in place that will enable us to ascertain the sources of these minerals. These measures will help achieve our goal that all our products and components containing 3TG be DRC conflict free.

In support of this policy, Helen of Troy will:

- Exercise due diligence with our suppliers consistent with the requirements of the Act, Rule 13p-1, and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Gather and provide due diligence information to confirm the sources of 3TG used in our products, and require our suppliers to do the same. Suppliers must complete the Conflict Minerals Reporting Template (CMRT) annually as requested by Helen of Troy.
- Require our suppliers to adopt similar policies and implement management systems to ensure 3TG originating from the DRC are sourced only from mines and smelters that are certified as conflict free. Suppliers must educate their supply chain and enforce certified conflict free sourcing. This includes adopting and implementing a Conflict Minerals Policy.
- Collaborate with our suppliers and others on industry-wide solutions to produce products that are DRC conflict free.
- Commit to transparency by making available this policy and reports on our progress to relevant stakeholders and the public.