

Conflict Minerals Policy

INTRODUCTION

Proceeds from the mining of certain minerals in the Democratic Republic of Congo (DRC) and countries adjoining it have been linked to human rights abuses through the funding of illegal armed groups. In accordance with the DoddFrank Wall Street Reform and Consumer Protection Act, the United States Securities and Exchange (SEC) Commission requires publicly traded companies to report on the origin of these conflict minerals.

This policy aligns with E.L.F. Co., Ltd.'s mission of serving those linked to the land and the promotion of human flourishing worldwide. It is consistent with our Code of Business Conduct, which voices the company's strong commitment to ethical business principles.

DEFINITIONS

Conflict minerals are defined as columbite-tantalite, cassiterite, gold, wolframite, and their derivatives tantalum, tin, and tungsten. This list may change since conflict minerals are also any mineral or its derivatives that the U.S. Secretary of State determines are financing conflict in the DRC or its adjoining countries.

DRC adjoining countries are the following countries bordering the DRC: Angola, Burundi, Central African Republic, Rwanda, Sudan, Tanzania, Uganda and Zambia. This definition can be extended to any supply of precious minerals that perpetuate conflict.

DRC conflict free is defined as parts or components that do not contain conflict minerals necessary to the functionality or production of the product that directly or indirectly finance or benefit armed groups in the DRC or DRC adjoining countries.

Conflict minerals obtained from recycled or scrap sources are defined as conflict minerals obtained from recycled metals. These recycled metals are reclaimed end-user or postconsumer products or scrap processed metals created during product manufacturing. Recycled metals include excess, obsolete, defective and scrap metal materials containing refined or processed metals that are appropriate to recycle in the production of tin, tantalum, tungsten or gold. Minerals partially processed, unprocessed or a bi-product from another ore are not included in this definition. Any refiner we engage with must be accredited by SRSP approved bodies.

POLICY

The company is committed to conducting its worldwide business operations in a manner that complies with applicable laws and regulations regarding conflict minerals. To comply with these requirements E.L.F. Co., Ltd. business operations will:

- Inform direct suppliers about this Conflict Minerals Policy and its relationship to the company's Supplier Code of Conduct.
- Work with its direct suppliers and sub-suppliers to understand the chain of custody for conflict minerals at least to the smelter or refiner level.
- Take measures to source parts and components from its direct suppliers and sub-suppliers that are DRC conflict free. These measures will include adopting, disseminating and incorporating this policy in related purchase orders, contracts and other appropriate agreements with suppliers as they are entered, revised or renegotiated.
- Work with direct suppliers to track and **improve** their performance in sourcing minerals from their suppliers and sub-suppliers that are validated as being DRC conflict free in accordance with a national or internationally recognized due diligence framework.

The following requirements must be met by E.L.F. Co., Ltd.'s suppliers:

- Assist E.L.F. Co., Ltd.'s compliance with the SEC regulations related to conflict minerals and provide all necessary declarations.
- Undertake reasonable due diligence within their supply chain to determine the chain of custody and origin of all minerals. Due diligence includes developing policies and management systems to use DRC conflict free minerals, including making these requirements apply to their direct suppliers and sub-tier suppliers and requiring them to do the same with lower tiers of suppliers.
- Take measures to purchase parts, components or materials from their direct suppliers and sub-tier suppliers who source minerals for their products from smelters or refiners validated as being DRC conflict free in accordance with a nationally or internationally recognized due diligence framework.
- Comply with information requests on the source and origin of all minerals in the parts, components or materials provided to E.L.F. Co., Ltd. Chain of custody data shall be maintained for five years and be provided to E.L.F. Co., Ltd. upon request.

COMPLIANCE

This policy applies to E.L.F. Co., Ltd.'s global business operations. Employees whose responsibilities relate to the supply or sourcing of parts, components, and materials should be informed and are expected to comply with these requirements and associated legislation or regulation.

NON-COMPLIANCE

E.L.F. Co., Ltd. will work with its suppliers to seek remedies for non-compliance with this policy. These remedies may include suspension or discontinuing engagement with the supplier.

REPORTING VIOLATIONS

Violations or potential violations of this policy should be reported by employees to their supervisor or to direct management.

ADDITIONAL INFORMATION / CONTACTS

General questions from employees, suppliers and customer about conflict minerals and this policy should be directed to E.L.F. Co., Ltd. 's Purchasing Manager Mr. Paul Philip Evans (paul@elf925.com)

Supplier Information Disclosure Form

The below information is required for E.L.F. Co., Ltd. to identify the source of precious minerals used in their products therefore please disclose the name, location and organization type of your precious metal supplier. In the situation that E.L.F. Co., Ltd. provides the precious metals for its own orders please state that below.

Precious Metal Supplier's Company Name: _____

Supplier's country of origin: _____

Supplier type (refiner, miner, whole seller, etc.): _____

If any further documentation is available regarding the chain of custody and/or point of origin of precious metals, please attach them with this document.

If your company is the refiner of precious minerals in your supply chain, please attach documents regarding your supplier chain due diligence.

If after the completion of this document there are any changes to the precious metal suppliers in your supply chain please contact E.L.F. Co., Ltd. With an updated form.

Policies Acknowledgement Form

Company Name: _____

Conflict Minerals Policy

I guarantee that all minerals used in the completion of orders for E.L.F. Co., Ltd. have been ethically sourced and are conflict free additionally in the case where E.L.F. Co., Ltd. provides the precious minerals only those precious minerals are used in the competition of the order. I also acknowledge that I have received, read and understood E.L.F. Co., Ltd. on Conflict Minerals Policy and/or that they have been explained to me.

Signature: _____

Date: _____

Position: _____