



Lifetime Brands, Inc. Conflict Minerals Policy Statement

There has been increased awareness of violence and human rights violations in the mining of certain minerals (gold, tin, tantalum, and tungsten) from a location described as the “Conflict Region,” which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. Companies around the globe have been requested to practice reasonable due diligence with their supply chain to assure that specified metals are not being sourced from mines in the Conflict Region, which are controlled by non-government military groups, or unlawful military factions.

The Dodd-Frank Wall Street Reform and Consumer Protection Act, passed into law in July 2010, contains requirements that U.S. companies report to the Securities and Exchange Commission (SEC) on the origin of conflict minerals or their derivatives and show due diligence if conflict minerals are sourced from the DRC or an adjoining country. The goal of the act is to cut direct and indirect funding of armed groups engaged in conflict and human rights abuses.

Lifetime Brands supports this initiative and compliance with the Dodd-Frank legislation and has either obtained, or is in the process of obtaining, information from our manufacturers and suppliers concerning the origin of the conflict minerals/metals used in the manufacture of certain Lifetime Brands’ products. Based upon information provided by our manufacturers and suppliers, Lifetime Brands does not knowingly use metals in our products that originate from the Conflict Region and are processed by smelters that are not certified as “conflict free” by an independent third party.

Suppliers of metals used in the manufacture of Lifetime Brands products (particularly tin) must demonstrate that they understand the conflict minerals initiatives and Lifetime Brands’ policy position and will not knowingly procure specified metals that originate from mines in the conflict region that are controlled by unlawful armed groups in the Conflict Region.

OUR COMMITMENT:

1. Support the aims and objectives of the U.S. legislation on the supply of conflict minerals.
2. Do not knowingly procure products from our manufacturers and suppliers with specified metals originating from facilities in the Conflict Region that are not certified as conflict free by an independent third party.
3. Ensure compliance with these requirements, and work with our manufacturers and suppliers to undertake reasonable due diligence within their supply chains to assure that specified metals within the materials used to manufacture our products originate only from:
 - Smelters who source minerals outside the Conflict Region or
 - Mines and smelters which have been certified by an independent third party as conflict free if sourced within the Conflict Region.



This due diligence includes having our suppliers provide written evidence documenting that the specified minerals, where applicable, used in the materials to manufacture our products originate from outside the Conflict Region or if they originate from within the Conflict Region, that the mines or smelters be certified as conflict free by an independent third party. The aim is to ensure that only conflict free materials are used in products that we procure.

If we discover the use of these specified minerals originate in facilities that are considered to be non-conflict free, in any product or material we procure, we will take appropriate actions to transition the product to be conflict free.

As a leading global company in the development and marketing of branded kitchenware, tableware, home décor and lifestyle products, Lifetime Brands is committed to ensuring the safety, health and protection of people and the environment worldwide. We promote these principles in our global business practices and our code of conduct.