



BIRKS GROUP INC.

CONFLICT MINERALS POLICY

Birks Group Inc. and its subsidiaries ("Birks Group") fully supports the goals and objectives of Section 1502 of the *Dodd-Frank Wall Street Reform and Consumer Protection Act* (the "Act"), which aims to prevent the use of certain "conflict minerals" that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or adjoining countries (including Angola, Burundi, The Central African Republic, The Republic of Congo, Uganda, Rwanda, South Sudan, Tanzania, and Zambia) (collectively, the "Covered Countries"). Conflict minerals include: columbite-tantalite ("tantalum"), cassiterite ("tin"), wolframite ("tungsten"), and gold (collectively, "Conflict Minerals").

Birks Group has adopted the Electronic Industry Citizenship Coalition® and The Global e-Sustainability Initiative, known as the Conflict Free Smelter Initiative ("CFSI") Reporting Template (the "Template") to facilitate disclosure and communication of information regarding smelters that provide material to our supply chain which includes questions about the origin of Conflict Minerals included in our products, as well as questions regarding supplier due diligence. Birks Group's compliance program has been designed to conform, in all material respects, with the framework in The Organization of Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Second Edition, and the related gold supplement for Conflict Minerals. Birks Group will perform ongoing supply chain risk assessment based on input from the EICC/GeSi Conflict-Free Smelter Program. As part of this assessment, we will use a reasonable documented process to:

- Determine the potential use of Conflict Minerals in our supply chain and work with our vendors to resolve the potential issues.
- Require vendors to conduct appropriate due diligence in order to be able to confirm the source of the Conflict Minerals necessary to the functionality of products caused to be manufactured by the Birks Group.
- Work with vendors during the product development process to understand the risk of Conflict Minerals being incorporated into the product.
- Request our vendors to adopt policies with respect to Conflict Minerals consistent with the Conflict Minerals Policy.

Birks Group is committed to the responsible sourcing of Conflict Minerals throughout its supply chain and to continuing to comply with the underlying SEC rules and regulations surrounding Conflict Minerals.