



Conflict Minerals Policy

The U.S. Securities and Exchange Commission ("**SEC**") has adopted conflict mineral disclosure and reporting rules, as mandated by the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "**Dodd-Frank Act**"). The Conflict Minerals Rule requires companies that file reports with the SEC to conduct a country of origin ("**COO**") investigation in their products, and report annually on the use and origin of conflict minerals (columbite-tantalite (coltan), cassiterite, wolframite, gold, tin, tantalum, tungsten and their derivatives) (collectively, "**Conflicts Minerals**") in the products they manufacture or contract with others to manufacture for them.

Lulu's Fashion Lounge Holdings, Inc. (the "**Company**" or "**we**") will request information from our vendors and suppliers and use reasonable efforts to ensure that products supplied to the Company are "DRC conflict-free," meaning that the sourcing of such conflict minerals do not benefit non-stated armed groups in the Democratic Republic of the Congo ("**DRC**") or adjoining countries of Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (the "**Covered Countries**"). As these inquiries will be reasonably designed to determine the origin of the Conflict Minerals, whether in the Covered Countries or from recycled or scrap resources, we expect our vendors and suppliers to participate fully, including by providing complete and timely responses to surveys and other inquiries during audits or upon requests. In the event the Company has a reason to believe that Conflict Minerals may have originated in the Covered Countries, we will take appropriate action to remedy the situation in a timely manner, including reassessment of supplier relationships. The Company has management systems in place and files annual reports with the SEC as contemplated by the Conflict Minerals Rule.

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Effective: March 1, 2024