

BED BATH & BEYOND®

Process Number: BBBPO-0022	Conflict Minerals Policy	
Implementation Date: 2014	Working Version 2	Revision Date: 3/2022

Bed Bath & Beyond Inc. and its subsidiaries (hereinafter referred to as the “Company”) are committed to compliance with the Securities Exchange Act rules for disclosure of conflict minerals.

PURPOSE: This Policy sets forth Company expectations for suppliers with respect to sourcing tin, tungsten, tantalum and gold, as well as the requirement for owned brand suppliers to respond to BBB’s annual surveys regarding the origin of these minerals if used in our products

BACKGROUND:

Rule 13p-1 under the Securities Exchange Act requires U.S. publicly traded companies that manufacture or contract to manufacture products to report to the Securities and Exchange Commission (“SEC”) annually on whether those products contain tin, tungsten, tantalum, and/or gold necessary to the functionality or production of the products and whether those minerals were derived from Covered Countries. The “Covered Countries” include: the Democratic Republic of the Congo; Angola; Burundi; Rwanda; South Sudan; Tanzania; Central African Republic; Uganda; Republic of the Congo; and Zambia. Additional information can be found at <http://www.sec.gov/news/press/2012/2012-163.htm>.

COMPANY REQUIREMENT:

Bed Bath & Beyond Inc. and its subsidiaries (collectively, “Bed Bath & Beyond”) takes its obligations under SEC regulations and other regulations seriously. Bed Bath & Beyond has adopted the supplier requirements contained herein as part of our Conflict Minerals Program. Suppliers are expected to review the Conflict Free Sourcing Initiative’s lists of compliant (conflict-free) smelters and refiners and strive to only accept tin, tungsten, tantalum, and gold that derive from smelters and refiners on these lists, including smelters and refiners that source from the Covered Countries. The lists are available at <http://www.conflictreesourcing.org/conflict-free-smelter-refiner-lists/>.

COMPANY OWNED BRAND PRODUCT:

In furtherance of the foregoing, Bed Bath & Beyond also specifically expects all suppliers of Bed Bath & Beyond imported and domestically sourced owned brand products to:

1. Adopt and comply with a conflict free sourcing policy that is consistent with these requirements and Bed Bath & Beyond’s publicly posted Code of Conduct, and to require its direct and indirect suppliers to do the same;
2. Determine which of the products incorporate tin, tungsten, tantalum, or gold, regardless of country of origin;
3. Map its supply chains associated with those products, including by engaging its suppliers to identify the smelters and refiners used in its supply chain to process the tin, tungsten, tantalum, or gold and determining whether those minerals are recycled, scrap or original extraction;
4. Obtain and prepare documentation supporting the origin determination for any tin, tungsten, tantalum, or gold incorporated into the products; and
5. Otherwise put in place policies, procedures and frameworks that are consistent with the Organisation for Economic Co-operation and Development’s Due Diligence Guidance for Responsible Supply Chains of Minerals From Conflict-Affected and High-Risk Areas.

Bed Bath & Beyond will annually require sourcing and related information from certain suppliers in the form of a survey that must be completed for imported and domestically sourced owned brand products supplied to Bed Bath & Beyond. Bed Bath & Beyond reserves the right to request this information on a more frequent basis and to request additional or supplemental information. If any information concerning the usage or source of tin, tungsten, tantalum, or gold

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furnished to Bed Bath & Beyond is later determined by the supplier to have been inaccurate, the supplier shall promptly (and in any event within 72 hours) notify Bed Bath & Beyond.

Bed Bath & Beyond also reserves the right to periodically request documentation evidencing a supplier's sourcing policies and practices and the efforts the supplier has taken to identify the source of the tin, tungsten, tantalum, or gold used in Bed Bath & Beyond imported and domestically sourced owned brand products.

CORRECTIVE ACTIONS:

Bed Bath & Beyond believes in establishing and maintaining long-term relationships with suppliers whenever possible. If Bed Bath & Beyond determines that a supplier may be violating any of the foregoing expectations, Bed Bath & Beyond may require the supplier to commit to and implement a corrective action plan within a reasonable timeframe. Continued failure to adhere to these expectations and refusal to address issues of concern may lead to termination of Bed Bath & Beyond's business relationship with the supplier. Nothing contained herein shall be interpreted to preclude Bed Bath & Beyond from terminating any supplier relationship at any time for any reason.

Violations of the Conflict Minerals Policy can be reported to Bed Bath & Beyond's Legal Department (Attention: General Counsel) at 908-688-0888 so that the matter may be fully investigated and appropriate remedial action taken.

Failure to adhere to the above policy or to provide requested information to Bed Bath & Beyond may result in vendor chargebacks or vendor payment hold.