

CONFLICT MINERALS POLICY

Party City is committed to principles of ethical business practice and recognition of the dignity of others, including the responsible sourcing of tin, tantalum, tungsten and gold (“3TG”), and we expect that our suppliers share this commitment. We have adopted this Policy as part of our efforts to encourage our suppliers to respect human rights and source product in a socially and environmentally responsible manner. In addition Party City is subject to the U.S. Conflict Minerals Rule and takes its obligations under that rule seriously.

Party City does not directly source 3TG from mines, smelters or refiners. We believe we are several steps removed in the supply chain from these market participants, limiting our influence in their sourcing. We therefore require the cooperation of our suppliers in the implementation of this Policy and in enabling Party City to meet its SEC compliance obligations. In furtherance of this Policy, suppliers are encouraged to:

- Put in place procedures for the traceability of 3TG;
- Source 3TG from sources that do not support conflict and, where practicable, source 3TG from smelters and refiners that are certified as “conflict free” or the equivalent by an independent third party;
- Cooperate with our 3TG due diligence process, which includes providing us, from time to time, with written certifications and other information concerning the origin of 3TG included in products and/or components supplied to Party City;
- Maintain reviewable business records supporting the source of 3TG;
- Otherwise adopt policies and procedures with respect to 3TG sourcing and traceability consistent with this Policy and the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; and
- Request their direct and indirect suppliers to adopt policies and procedures that are consistent with this Policy.

Party City does not support general embargoes of 3TG, including from the Democratic Republic of the Congo region, and encourages its suppliers to continue to source responsibly from conflict-affected and high risk areas where practicable.

Party City reserves the right to require from any supplier at any time such additional information, certifications and documentation as Party City shall deem necessary to monitor or assess compliance with this Policy or other contractual certifications, warranties, covenants and representations provided to Party City. Suppliers are encouraged to contact the purchasing manager with whom they regularly conduct business if they have questions concerning this Policy. In addition, concerns regarding this Policy, or violations, can be reported as follows:

By email via: sp.amscansec@amscan.com

By mail to the following address: c/o Party City Holdco Inc., 80 Grasslands Road, Elmsford, NY 10523, Attention: General Counsel