# UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

	FORM SD
SPECIA	LIZED DISCLOSURE REPORT

### SMITH & WESSON BRANDS, INC.

(Exact name of registrant as specified in its charter)

NEVADA (State or other jurisdiction of incorporation or organization)

 $\boxtimes$ 

001-31552 (Commission File Number) 87-0543688 (IRS Employer Identification No.)

2100 Roosevelt Avenue, Springfield, Massachusetts (Address of principal executive offices)

01104 (Zip code)

Kevin A. Maxwell, SVP, General Counsel, Chief Compliance Officer and Secretary – (800) 331-0852 (Name and telephone number, including area code, of the person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2023.

#### **Section 1 Conflict Minerals Disclosure**

#### **Item 1.01 Conflict Minerals Disclosure and Report**

A copy of Smith & Wesson Brands, Inc. Conflict Minerals Report is filed as Exhibit 1.01 hereto and is publicly available at <a href="https://ir.smith-wesson.com/corporate-governance/conflict-minerals">https://ir.smith-wesson.com/corporate-governance/conflict-minerals</a>. The content of our website as referred to in this Form SD is included for general information only and is not incorporated by reference into this Form SD.

#### Item 1.02 Exhibits

Exhibit 1.01 Conflict Minerals Report

#### **Section 2 Exhibits**

#### **Item 2.01 Exhibits**

The following exhibit is filed as part of this report:

Exhibit 1.01 – Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form.

#### **SIGNATURES**

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

SMITH & WESSON BRANDS, INC., a Nevada corporation

By: /s/ Kevin A. Maxwell Dated: May 31, 2024

Kevin A. Maxwell Senior Vice President, General Counsel, Chief Compliance Officer and Secretary



#### SMITH & WESSON BRANDS, INC.

#### **CONFLICT MINERALS REPORT**

### FOR THE REPORTING PERIOD JANUARY 1, 2023 TO DECEMBER 31, 2023

#### INTRODUCTION

This Conflict Minerals Report for Smith & Wesson Brands, Inc. ("SWBI," "Company," "we," or "our") is provided for the reporting period January 1, 2023 to December 31, 2023, and is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (the "Rule"), and the Public Statement on the Effect of the Recent Court of Appeals Decision on the Conflict Minerals Rule issued by the Director of the Division of Corporation Finance of the Securities and Exchange Commission on April 29, 2014 (the "SEC Statement"). The Rule was adopted by the Securities and Exchange Commission (the "SEC") to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act. The Rule imposes certain reporting obligations on SEC registrants whose manufactured products contain tin, tantalum, tungsten, or gold ("3TG," also defined by the Rule as "conflict minerals"), and who have reason to believe that the products they manufacture, or contract to manufacture, contain conflict minerals that are necessary to the functionality or production of those products. If the SEC registrant has reason to believe that any conflict minerals may have originated in the Democratic Republic of the Congo or an adjoining country, or is unable to determine the country of origin of those conflict minerals, the SEC registrant is required to submit a Conflict Minerals Report to the SEC that includes a description of the measures it took to exercise due diligence on the conflict minerals' source and chain of custody.

#### **COMPANY BACKGROUND**

SWBI is a U.S.-based leader in firearm manufacturing and design, delivering a broad portfolio of quality handgun, long gun, and suppressor products to the global consumer and professional markets under the iconic Smith & Wesson® and Gemtech® brands. We also provide manufacturing services, including forging, machining and precision plastic injection molding services.

A copy of our Conflict Mineral Policy is available on our website at <a href="https://ir.smith-wesson.com/corporate-governance/conflict-minerals">https://ir.smith-wesson.com/corporate-governance/conflict-minerals</a>.

#### REPORT

This Conflict Minerals Report is provided for the reporting period January 1, 2023 to December 31, 2023 in accordance with the Rule, the instructions to Form SD and the SEC Statement. Please refer to the Rule, Form SD and Securities Exchange Release No. 34-67716 for definitions to the terms used in this Report, unless otherwise defined herein.

In accordance with the Rule and the instructions to Form SD, we undertook due diligence to determine the source of origin of any necessary conflict minerals used in products we manufacture or contract to manufacture. In conducting due diligence, we implemented the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (including the Supplements on Tin, Tantalum and Tungsten, and the Gold Supplement) (Third Edition OECD 2016) ("OECD Guidance"), an internationally recognized due diligence framework.

#### Design of Our Due Diligence Measures

Our conflict minerals due diligence measures have been designed to conform with the OECD Guidance, as applicable, for tin, tantalum, tungsten, gold and downstream companies (as the term is defined in the OECD Guidance), in all material respects. We do not make direct purchases of raw ore or unrefined conflict minerals in the Covered Countries. We designed our due diligence measures to:

- 1. design and implement strategies to determine the presence of conflict minerals in our products;
- 2. establish management systems for supply chain due diligence and reporting compliance;
- 3. identify and assess conflict minerals content in our supply chain;
- 4. identify and mitigate any risk for potential non-compliance with the Rule; and
- 5. report on our conflict minerals supply chain due diligence activities, as required by the Rule.

#### Due Diligence Measures Performed

Our due diligence measures for the applicable reporting period included the following activities:

- 1. We updated our product taxonomy for the products that were subject to reporting in the applicable reporting period, and reviewed additions with our appropriate personnel, to determine which products or components have the possibility of containing necessary conflict minerals.
- 2. We surveyed any suppliers involved with products or components we determined could possibly contain necessary conflict minerals, to ascertain for each of these conflict minerals (i) whether the product or component contained necessary conflict minerals, (ii) the smelter or refiner where it was processed, (iii) its country of origin and (iv) its mine of origin.
- 3. Where possible, we leveraged the due diligence conducted on smelters and refiners by the Responsible Minerals Initiative (the "RMI"), and its Responsible Minerals Assurance Process (the "RMAP"), by comparing the names of the smelters identified by our suppliers to those identified as compliant in the RMAP. The RMAP uses independent private sector auditors to audit the source, including mines of origin, and chain of custody of the conflict minerals used by smelters and refiners that agree to participate in the RMAP. The smelters and refiners that are found to be RMAP compliant are those for which the independent auditor has verified that the smelter's or refiner's conflict minerals originated from conflict free mines and trading in the Democratic Republic of the Congo or any of its adjoining countries. A list of smelters identified to date, and associated information, is provided as **Attachment A**.

#### **Determination; Continuing Mitigation Efforts**

After conducting good faith due diligence on the presence of necessary conflict minerals in certain of our products, we have been unable to identify all smelters, refiners in our supply chain and the ultimate source of origin of such minerals. We are continuing our efforts to identify and mitigate risks in our supply chain and to obtain complete information from our upstream suppliers. Our efforts are necessarily dependent upon the willingness of our supply chain participants to cooperate and assist in this endeavor and there can be no guarantee that we will be able to obtain adequate and reliable information upon which to base our analysis.

## Attachment A SMELTER DETAILS

Asabit Refining Canada Lid.         Canada (Gold Indonesia)         Gold Indonesia         Tin Mitsui Mining and Smelling Co., Lid.         Indonesia         Tin Mitsui Mining and Smelling Co., Lid.         Indonesia         Tin Gold Indonesia         Tin Gol	Smelter Name	Smelter Country	3TG
Mitsui Mining and Smelting Co., Ltd.         Japan         Cloid           Hengyang King Liffing New Materials Co., Ltd.         China         Tantalum           PT Refined Bangka Tin         Indonesia         Tin           Global Tungsten & Powders LLC         Winter States         United States         Tin           PT Bangka Tin Industry         Indonesia         Tin           CV Verns Infi Industry         Indonesia         Tin           Micracao Taboea S.A.         Brazil         Tin           Mincracao Taboea S.A.         Germany         Tantalum           Jangwu H.C. Starek Tungsten Products Co., Ltd.         China         Tungsten           Jamyu H.C. Starek Tungsten Products Co., Ltd.         China         Tin           Aurubis Berser         Belgium         Tin           Janga M. Meng Industry and Trade LLC         Germany         Gold           Gejiu Kai Meng Industry and Trade LLC         China         Tin           Human Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch         China         Tin           Guangdong Hanhe Non-Ferrous Metal Co., Ltd.         China         Tin           Japan New Metals Co., Ltd.         Tin         Tin           Japan New Metals Co., Ltd.         Tin         Tin           Metal T	Asahi Refining Canada Ltd.	Canada	Gold
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Japan

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Brazil

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Tungsten

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Tin

A.L.M.T. TUNGSTEN Corp.

Melt Metais e Ligas S.A. PT Stanindo Inti Perkasa

Tanaka Kikinzoku Kogyo K.K.

PT Aneka Tambang (Persero) Tbk Indonesia Gold PT Premium Tin Indonesia Indonesia Tin Resind Industria e Comercio Ltda. Brazil Tin AngloGold Ashanti Corrego do Sitio Mineracao Brazil Gold Metalor USA Refining Corporation United States Gold Royal Canadian Mint Canada Gold Metalor Technologies S.A. Switzerland Gold Jiujiang Tanbre Co., Ltd. China Tantalum Asahi Pretec Corp. Japan Gold Guangdong Rising Rare Metals-EO Materials Ltd. China Tantalum Boliden AB Sweden Gold PT Prima Timah Utama Indonesia Tin Mitsui Mining and Smelting Co., Ltd. Tantalum Japan Kojima Chemicals Co., Ltd. Japan Gold JiuJiang JinXin Nonferrous Metals Co., Ltd. China Tantalum Materion Newton Inc. United States Tantalum Heraeus Germany GmbH Co. KG Germany Gold Tokuriki Honten Co., Ltd. Japan Gold Ganzhou Seadragon W & Mo Co., Ltd. China Tungsten Yamakin Co., Ltd. Japan Gold Mitsubishi Materials Corporation Japan Gold Asaka Riken Co., Ltd. Japan Gold CCR Refinery - Glencore Canada Corporation Canada Gold Masan High-Tech Materials Vietnam Tungsten PT Aries Kencana Sejahtera Tin Indonesia Argor-Heraeus S.A. Gold Switzerland SEMPSA Joyeria Plateria S.A. Spain Gold Malaysia Smelting Corporation (MSC) Malaysia Tin PT Panca Mega Persada Indonesia Tin Mitsubishi Materials Corporation Japan Tin D Block Metals, LLC United States Tantalum TANIOBIS Co., Ltd. Thailand Tantalum Metallic Resources, Inc. United States Tin Dowa Japan Gold Chongyi Zhangyuan Tungsten Co., Ltd. China Tungsten PT Sukses Inti Makmur Indonesia Tin Gejiu Non-Ferrous Metal Processing Co., Ltd. China Tin TANIOBIS Japan Co., Ltd. Tantalum Japan Poland Tin

China

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Malaysia

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Philippines

Tungsten

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Fenix Metals

Xiamen Tungsten (H.C.) Co., Ltd.

Bangko Sentral ng Pilipinas (Central Bank of the Philippines)

Shandong Zhaojin Gold & Silver Refinery Co., Ltd.

Malaysia Smelting Corporation (MSC)

PT Timah Tbk Mentok

Gejiu Non-Ferrous Metal Processing Co., Ltd. Yunnan Chengfeng Non-ferrous Metals Co., Ltd.