

---

---

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION**  
Washington, D.C. 20549

---

**FORM SD**

---

**SPECIALIZED DISCLOSURE REPORT**

---

**SMITH & WESSON BRANDS, INC.**  
(Exact name of registrant as specified in its charter)

---

**NEVADA**  
(State or other jurisdiction of  
incorporation or organization)

**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 <https://ir.smith-wesson.com/corporate-governance/conflict-minerals>. 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*

\_\_\_\_\_  
Kevin A. Maxwell

*Senior Vice President, General Counsel,  
Chief Compliance Officer and Secretary*

Dated: May 31, 2024



**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 <https://ir.smith-wesson.com/corporate-governance/conflict-minerals>.

## 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**

<u>Smelter Name</u>	<u>Smelter Country</u>	<u>3TG</u>
Asahi Refining Canada Ltd.	Canada	Gold
PT Timah Tbk Mentok	Indonesia	Tin
Mitsui Mining and Smelting Co., Ltd.	Japan	Gold
Hengyang King Xing Lifeng New Materials Co., Ltd.	China	Tantalum
PT Refined Bangka Tin	Indonesia	Tin
Global Tungsten & Powders LLC	United States	Tungsten
PX Precinox S.A.	Switzerland	Gold
PT Bangka Tin Industry	Indonesia	Tin
CV Venus Inti Perkasa	Indonesia	Tin
Mineracao Taboca S.A.	Brazil	Tin
TANIOBIS GmbH	Germany	Tantalum
Jiangwu H.C. Starck Tungsten Products Co., Ltd.	China	Tungsten
Aurubis Beerse	Belgium	Tin
Agosi AG	Germany	Gold
Gejiu Kai Meng Industry and Trade LLC	China	Tin
Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch	China	Tungsten
Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	China	Tin
Global Advanced Metals Boyertown	United States	Tantalum
Japan New Metals Co., Ltd.	Japan	Tungsten
PT Mitra Stania Prima	Indonesia	Tin
Metalor Technologies (Singapore) Pte., Ltd.	Singapore	Gold
PT Tinindo Inter Nusa	Indonesia	Tin
PT Babel Inti Perkasa	Indonesia	Tin
Mineracao Taboca S.A.	Brazil	Tantalum
PT Timah Tbk Kundur	Indonesia	Tin
Sumitomo Metal Mining Co., Ltd.	Japan	Gold
Eco-System Recycling Co., Ltd. East Plant	Japan	Gold
F&X Electro-Materials Ltd.	China	Tantalum
C. Hafner GmbH + Co. KG	Germany	Gold
Ishifuku Metal Industry Co., Ltd.	Japan	Gold
Alpha	United States	Tin
PT Bukit Timah	Indonesia	Tin
TANIOBIS Smelting GmbH & Co. KG	Germany	Tungsten
Umicore S.A. Business Unit Precious Metals Refining	Belgium	Gold
XIMEI RESOURCES (GUANGDONG) LIMITED	China	Tantalum
Dowa	Japan	Tin
Nadir Metal Rafineri San. Ve Tic. A.S.	Turkey	Gold
Valcambi S.A.	Switzerland	Gold
LS-NIKKO Copper Inc.	Korea, Republic of	Gold
Solar Applied Materials Technology Corp.	Taiwan	Gold
TANIOBIS Smelting GmbH & Co. KG	Germany	Tantalum
Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	China	Gold
Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	China	Tin
Taki Chemical Co., Ltd.	Japan	Tantalum
Niagara Refining LLC	United States	Tungsten
EM Vinto	Bolivia	Tin
Guangdong Xianglu Tungsten Co., Ltd.	China	Tungsten
CV Ayi Jaya	Indonesia	Tin
Telex Metals	United States	Tantalum

Thaisarco	Thailand	Tin
Umicore Precious Metals Thailand	Thailand	Gold
Global Advanced Metals Aizu	Japan	Tantalum
Western Australian Mint (T/a The Perth Mint)	Australia	Gold
Asahi Refining USA Inc.	United States	Gold
H.C. Starck Tungsten GmbH	Germany	Tungsten
White Solder Metalurgia e Mineracao Ltda.	Brazil	Tin
Hunan Jintai New Material Co., Ltd.	China	Tungsten
Jiangxi Copper Co., Ltd.	China	Gold
Aurubis Berango	Spain	Tin
Metalor Technologies (Hong Kong) Ltd.	China	Gold
Rui Da Hung	Taiwan	Tin
Heimerle + Meule GmbH	Germany	Gold
United Precious Metal Refining, Inc.	United States	Gold
PT Artha Cipta Langgeng	Indonesia	Tin
Metalurgica Met-Mex Penoles S.A. De C.V.	Mexico	Gold
Ulba Metallurgical Plant JSC	Kazakhstan	Tantalum
Materion	United States	Gold
JX Nippon Mining & Metals Co., Ltd.	Japan	Gold
Aida Chemical Industries Co., Ltd.	Japan	Gold
PT ATD Makmur Mandiri Jaya	Indonesia	Tin
Magnu's Minerais Metais e Ligas Ltda.	Brazil	Tin
Shandong Gold Smelting Co., Ltd.	China	Gold
Gold Refinery of Zijin Mining Group Co., Ltd.	China	Gold
Operaciones Metalurgicas S.A.	Bolivia	Tin
Ningxia Orient Tantalum Industry Co., Ltd.	China	Tantalum
Zhongyuan Gold Smelter of Zhongjin Gold Corporation	China	Gold
China Tin Group Co., Ltd.	China	Tin
Xiamen Tungsten Co., Ltd.	China	Tungsten
Tin Smelting Branch of Yunnan Tin Co., Ltd.	China	Tin
Aurubis AG	Germany	Gold
Minsur	Peru	Tin
Nihon Material Co., Ltd.	Japan	Gold
PT Bangka Prima Tin	Indonesia	Tin
PT Sariwiguna Binasentosa	Indonesia	Tin
Kennecott Utah Copper LLC	United States	Gold
Rand Refinery (Pty) Ltd.	South Africa	Gold
Ohura Precious Metal Industry Co., Ltd.	Japan	Gold
AMG Brasil	Brazil	Tantalum
MKS PAMP SA	Switzerland	Gold
Kennametal Huntsville	United States	Tungsten
Wolfram Bergbau und Hutten AG	Austria	Tungsten
Chimet S.p.A.	Italy	Gold
O.M. Manufacturing Philippines, Inc.	Philippines	Tin
Changsha South Tantalum Niobium Co., Ltd.	China	Tantalum
PT Belitung Industri Sejahtera	Indonesia	Tin
O.M. Manufacturing (Thailand) Co., Ltd.	Thailand	Tin
Yokohama Metal Co., Ltd.	Japan	Gold
Heraeus Metals Hong Kong Ltd.	China	Gold
Matsuda Sangyo Co., Ltd.	Japan	Gold
Istanbul Gold Refinery	Turkey	Gold
A.L.M.T. TUNGSTEN Corp.	Japan	Tungsten
Tanaka Kikinzoku Kogyo K.K.	Japan	Gold
Melt Metais e Ligas S.A.	Brazil	Tin
PT Stanindo Inti Perkasa	Indonesia	Tin

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.	Japan	Tantalum
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	Indonesia	Tin
Argor-Heraeus S.A.	Switzerland	Gold
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.	Japan	Tantalum
Fenix Metals	Poland	Tin
Xiamen Tungsten (H.C.) Co., Ltd.	China	Tungsten
Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Philippines	Gold
Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	China	Gold
Malaysia Smelting Corporation (MSC)	Malaysia	Tin
PT Timah Tbk Mentok	Indonesia	Tin
Gejiu Non-Ferrous Metal Processing Co., Ltd.	China	Tin
Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	China	Tin