



<b>Title:</b>	<b>ETHICS-013 Corporate Stewardship Policy</b>	<b>Effective Date:</b>	<b>09/17/2024</b>	<b>Revision #:</b>	<b>3</b>
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Smith & Wesson Brands, Inc.  
Corporate Stewardship Policy

Smith & Wesson’s Corporate Stewardship Policy (this “Policy”) sets forth how the company respects fundamental rights by maintaining policies and processes that allow the company to identify how it can make a positive contribution to the advancement of such rights, while also monitoring business risks. Our firearms business, with its iconic Smith & Wesson brand, was founded in 1852 and has manufactured and sold firearms for more than 170 years. Throughout that time, the company’s story has been one of setting the standard for quality and responsibility, while overcoming challenges and adapting to change.

This Policy addresses certain of the opportunities and challenges faced by our business. We are a firearms company that manufactures lawful products, and one that is unique in that it receives express Constitutional protection. That makes us not only a steward of an iconic brand, but also stewards of a fundamental right. Because our business stands on the Second Amendment rights of our customers, we evaluate risk in the context of that fundamental right, as recently clarified by the U.S. Supreme Court in *Bruen*. In doing so, we recognize that for many decades now, our greatest challenge has come from those who oppose or seek to restrict the Constitutionally recognized right of free individuals to own firearms for self-defense, sport and hunting. As we are the vehicle by which citizens exercise a Constitutional right, we necessarily are the target of those who seek to restrict that right. The private possession of firearms is legal in a great many jurisdictions, and in the United States, it is protected as one of the most fundamental of rights, enshrined in the Second Amendment. As one of the most recognized firearms brands in the United States, therefore, we occupy a unique position of trust and our customers expect us to play an important role in helping to protect and preserve their right to keep and bear Arms.

At the same time, as stewards of the company and its iconic Smith & Wesson brand, we recognize that reducing the harm caused by the unlawful or improper use of any product, including firearms, is an issue of legitimate public concern. We also recognize the unfortunate fact that there are persons and organizations who would improperly judge us based on the wrongful, even criminal acts of others, and that to the extent that we can take effective steps to mitigate the harm caused by the unlawful or improper use of firearms, we might enhance the rights of lawful gun owners and may foster a greater understanding of the benefits of private ownership of firearms.

Such matters are part of the broader concern for environmental, social and governance issues that have taken on increasing importance to investors and business partners, and which we have addressed through existing policies that this Policy brings together. As with any industry, the legal, regulatory and consumer landscapes continue to evolve, and we must periodically assess our practices and refine them, where warranted. In addition, to meet our objective of being a good corporate steward, we must consider our responsibilities with respect to (i) employee, safety and governance risks, including the risks created by the unlawful or improper use of firearms, and (ii) preserving the right to keep and bear Arms enshrined in the United States Constitution. In order to meet those dual objectives, we have and will continue to do the following:

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- Review our practices and business relationships regularly, use objective, automated, risk-based due diligence processes, and evaluate the effectiveness of our systems, for the purpose of identifying where our processes and partners may impact the unlawful or improper use of firearms.
- Support initiatives that promote the safe ownership, use, and storage of firearms and focus our resources on those initiatives we believe provide the greatest reduction in the unlawful or improper use of firearms, such as Project ChildSafe, FixNICS, Don't Lie for the Other Guy, Operation Secure Store, and various suicide prevention programs.
- Market our firearms in such a manner as to allow responsible adults to make informed decisions regarding the best way to protect themselves and their families.
- Understand and respect the myriad laws and regulations governing the manufacture, sale, distribution, marketing, and use of firearms, and work with federal, state, and local regulatory authorities in the enforcement of those laws.
- Implement and enforce policies and procedures that assist us in identifying and addressing sustainability efforts and other risks and challenges to our business and our stakeholders, including, but not limited to, codes of conduct and ethics, firearms compliance, and reasonable controls on products through the distribution channels.
- Maintain a media monitoring program, or another process the company finds suitable, that canvases both traditional and social media on a regular basis for reports or dialogue that may have an impact on our brand. Regularly assess whether, in management's business judgment, any technological solution to the unauthorized use of firearms is reliable, operates consistently with end users' expectations for a reliable firearm, and has a sufficient market among the company's customer base that the company can make a reasonable return on the projected cost of development and commercialization.
- Evaluate the financial and reputational risk to the company arising from the organized opposition to the private ownership of firearms and identify ways to mitigate such risk.

Ultimately, we respect that the company is owned by shareholders who expect we will operate our business in a responsible manner that satisfies our fiduciary duties to such shareholders, while taking into account the interests of our other stakeholders and at all times respecting the position of trust we occupy with respect to protecting and preserving the right of the people to keep and bear Arms.