



Title:	ETHICS-013 Corporate Stewardship Policy	Effective Date:	04/17/2020	Policy #:	ETHICS-013
Dept:	Compliance	Periodic Review Date:	04/17/2021	Revision #:	1

American Outdoor Brands Corporation
Corporate Stewardship Policy

Our firearms business, with its iconic Smith & Wesson brand, was founded in 1852 and has manufactured and sold firearms for over 167 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.

Today, the company believes that its greatest challenge comes from those who oppose the long respected fundamental right of free individuals to own firearms for self-defense, sport, and hunting. The private possession of firearms, however, 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 to the United States Constitution. 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 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 (ESG) issues that have taken on increasing importance to investors and business partners, and which we have addressed through existing policies that this Corporate Stewardship Policy brings together. In addition, to meet our objective of being a good corporate steward, we must take into account our responsibilities with respect to (i) employee, safety, and governance risks, including the risks caused by the unlawful or improper use of firearms, and (ii) preserving the right to bear arms enshrined in the United States Constitution. In order to meet those dual objectives, we have and will continue to do the following:

- 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, Don’t Lie for the Other Guy, Operation Secure Store, and various suicide prevention programs.
- Establish our Principles for Responsible Engagement as a foundation for respectful dialogue with stakeholders, and the basis on which to engage with those who genuinely seek solutions to the unlawful or improper use of firearms in a manner that is consistent with the Second Amendment to the United States Constitution, our values, and the values of our customers.
- 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, and use of firearms, and work with federal, state, and local regulatory authorities in the enforcement of those laws.



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- Implement and enforce policies and procedures that assist us in identifying and addressing ESG and other risks and challenges to our business and our stakeholders, including the following:

Policy, Practice, Program	Shareholders	Employees	Customers	Community
<u>Business Ethics</u>				
Code of Conduct and Ethics	X	X	X	X
Code of Conduct and Ethics for CEO and Senior Financial Officers	X	X	X	X
Guidelines on Ethical Behavior	X	X		
<u>Compliance</u>				
Firearms Compliance Policy	X	X		
Whistleblower Policy	X	X		
Anti-Corruption Policy	X	X	X	X
International Sales Procedures	X	X	X	
International Sales Due Diligence Procedures	X	X	X	X
International Supplier Due Diligence Procedures	X	X	X	X
Export Compliance Policy	X	X	X	
<u>Human Resources</u>				
Helpline (anonymous reporting)	X	X	X	X
Non-Discrimination / Harassment Policy	X	X		
Sexual Harassment Policy	X	X		
Workplace Violence Policy	X	X		X
<u>Safety</u>				
Product Testing	X		X	X
Product Recalls Procedure	X		X	
Project ChildSafe	X		X	X
Don't Lie for the Other Guy	X			X
Operation Secure Store	X		X	X
Product Owner's Manuals	X		X	X
Safety Locks Program	X		X	X
Firearm Safety Literature and Videos	X		X	X

- Regularly evaluate our policies and procedures to ensure that we act consistent with our values and obligations to our employees, investors, business partners, and customers.
- Strive to manage our environmental impact and look for opportunities to minimize our environmental impact across our operations.
- Engage in a media monitoring program conducted by a third-party, or such other process the Company finds appropriate, 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 consistent 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 financial and reputational risk to the company arising from the organized opposition to the private ownership of firearms and identifying 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, while at all times respecting the position of trust we occupy with respect to protecting and preserving the right of our customers to bear arms.