

Title:	PROC-002 Conflict Mineral Policy	Effective Date:	10/29/2025	Revision #:	4
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CONFLICT MINERAL POLICY

1. PURPOSE

The purpose of this policy is to document the Company’s (as defined below) guidelines and procedures necessary for complying with Security and Exchange Commission (“SEC”) rules under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”). Section 1502 of the Dodd-Frank Act imposes reporting requirements to publicly disclose a company’s use of minerals that originate in the Democratic Republic of Congo (“DRC”) or an adjoining country (together with the DRC, “Covered Countries”). Tin, tantalum, tungsten and gold (“3TG”) sourced from a Covered Country are considered “conflict minerals” by the SEC. The rule applies to a company that uses any conflict minerals if:

- The company files reports with the SEC pursuant to Exchange Act Sections 13(a) or 15(d); and
- The minerals are “necessary to the functionality or production” of a product manufactured by the company or contracted by the company to be manufactured.

2. SCOPE

This policy applies to all Company employees, particularly those in the Procurement, Engineering, Quality, Employee Health & Safety (EH&S), Marketing, Compliance, and Legal departments.

3. POLICY

Smith & Wesson Brands, Inc. and its subsidiaries (together, the “Company”) is committed to complying with Section 1502 of the Dodd-Frank Act. As a publicly traded company, the Company is obligated to publicly disclose by May 31 of each year the use and source of any 3TG minerals necessary for the functionality or production of its products. To meet this regulatory requirement, the Company will engage in a formal review process on an annual basis to ascertain whether any 3TG minerals are present and necessary for the functionality or production of its products, the results of which will dictate the Company’s SEC reporting requirements.

4. PROCEDURE

The Company’s Compliance department has developed detailed procedures that are designed to assist the Company in complying with Section 1502 of the Dodd-Frank Act. These procedures are included in the desk procedures maintained by the Corporate Compliance team. The following is a high level outline of the Company’s program for reviewing potential use and sourcing of conflict minerals.

1. Annually, during the Company’s second fiscal quarter, an employee designated by the Chief Compliance Officer (the “Designated Employee”) will identify other key employees who have awareness and knowledge of 3TG minerals that are necessary for the functionality or production of the Company’s products.

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2. The Designated Employee, with assistance from the Legal Department, will conduct a risk assessment to ascertain whether or not 3TG minerals are used in the production or functionality of the Company's products. The risk assessment will include a full product taxonomy of all products directly manufactured and contracted for manufacture on the Company's behalf.
 - a. If a product is determined to have a 3TG mineral, then a conflict minerals survey will be sent to the supplier requesting information regarding the life cycle of the 3TG mineral in question.
 - b. Upon receipt of the completed surveys, the Designated Employee will review the responses for completeness and reasonableness.
 - c. If additional information is required, the Designated Employee will follow up with the supplier accordingly.
3. The Company will continue its process of due diligence until April of each year, upon which a decision will be made as to how the Company will formally report the results of its review to the SEC.
4. Upon completion of the risk assessment and due diligence process, the Company will follow its standard process for SEC reporting and report to the SEC accordingly.
5. The Director of Procurement or his/her designee will ensure that all key supporting documentation, including, but not limited to, the risk assessment, product taxonomy, and supplier surveys, will be maintained electronically for future reference.
6. Annually, the Corporate Compliance team, will identify those employees who have familiarity with the use or functionality of any potential conflict minerals. These individuals will be provided training with regard to the Company's efforts to comply with the SEC rules and regulations promulgated pursuant to Section 1502 of the Dodd-Frank Act.

5. DEFINITIONS

3TG - The acronym used to refer to the four common conflict mineral derivatives - tin, tantalum, tungsten and gold.

Conflict minerals – Columbite tantalite, also known as coltan (the metal ore from which tantalum is extracted), cassiterite (the metal ore from which tin is extracted), wolframite (the metal ore from which tungsten is extracted), gold, or their derivatives; or any other mineral or its derivatives the mining and/or smelting of which is determined by the U.S. Secretary of State to be financing conflict in the Democratic Republic of Congo or an adjoining country.

Downstream companies - Companies in the supply chain that, for purposes of conflict mineral disclosure and reporting, procure conflict minerals or their derivatives from other companies, including material producers, part and component manufacturers, and raw material suppliers.

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Due diligence - Conduct that conforms to a nationally or internationally recognized set of standards or guidance.

Upstream companies - Companies in the supply chain that, for purposes of conflict mineral disclosure and reporting, supply conflict minerals or their derivatives to other companies, including mines and smelters, local traders or exporters.

6. REFERENCE

Desk Procedure maintained by Corporate Compliance team

7. POLICY ADHERENCE AND EXCEPTIONS

1. Failure to comply with the requirements of this Policy is cause for disciplinary action, up to and including termination of employment.
2. Exceptions to this policy may only be made by the Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or General Counsel.