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

FORM SD

SPECIALIZED DISCLOSURE REPORT



AMERICAN OUTDOOR BRANDS, INC.

(Exact name of registrant as specified in its charter)

DELAWARE

(State or other jurisdiction of incorporation or organization)

001-39366

(Commission File Number)

84-4630928

(IRS Employer
Identification No.)

**1800 North Route Z, Suite A
Columbia, Missouri**

(Address of principal executive offices)

65202

(Zip code)

Douglas V. Brown, Chief Counsel and Secretary – (800) 338-9585

(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, 2021.

Section 1 Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

A copy of American Outdoor Brands, Inc. Conflict Minerals Report is filed as Exhibit 1.01 hereto and is publicly available at <https://ir.aob.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.

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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.

AMERICAN OUTDOOR BRANDS, INC., a Delaware corporation

By: /s/ Douglas V. Brown

Douglas V. Brown

Chief Counsel and Corporate Secretary

Dated: May 31, 2022

**AMERICAN OUTDOOR BRANDS, INC. CONFLICT MINERALS REPORT
FOR THE REPORTING PERIOD JANUARY 1, 2021 TO DECEMBER 31, 2021**

INTRODUCTION

This Conflict Minerals Report for American Outdoor Brands, Inc. (“AOB,” “Company,” “we,” or “our”) is provided for the reporting period January 1, 2021 to December 31, 2021, 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 (“Dodd-Frank 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

AOB is a leading provider of outdoor products and accessories encompassing hunting, fishing, camping, shooting, and personal security and defense products for rugged outdoor enthusiasts. We conceive, design, produce or source, and sell products and accessories, including shooting supplies, rests, vaults, and other related accessories; lifestyle products such as premium sportsman knives and tools for fishing and hunting; land management tools for hunting preparedness; harvesting products for post-hunt or post-fishing activities; electro-optical devices, including hunting optics, firearm aiming devices, flashlights, and laser grips; reloading, gunsmithing, and firearm cleaning supplies; and survival, camping, and emergency preparedness products. Our owned brands include Caldwell®, Wheeler®, Tipton®, Frankford Arsenal®, LaserLyte®, Lockdown®, Hooyman®, BOG®, Crimson Trace®, Imperial®, Schrade®, Old Timer®, Uncle Henry®, BUBBA®, MEAT!™, and ust®, and we license for use in association with certain products we sell additional brands, including Smith & Wesson® Accessories, M&P® Accessories, and Thompson/Center™ Arms.

A copy of the Company’s Conflict Mineral Policy is available on our website at <https://ir.aob.com/corporate-governance/conflict-minerals>.

REPORT

This Conflict Minerals Report is provided for the reporting period January 1, 2021 to December 31, 2021 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, AOB undertook due diligence to determine the source of origin of any necessary conflict minerals used in products it manufactures or contracts to manufacture. In conducting its due diligence, AOB 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. The Company does 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 reporting period January 1, 2021 to December 31, 2021 included the following activities:

1. We updated our product taxonomy for the products that were subject to reporting in the 2021 reporting period, and reviewed additions with company product managers, engineers, metallurgists and supply chain 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. 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 hereto as **Attachment A**.

Determination: 2022 Risk Mitigation

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

Attachment A

SMELTER DETAILS

<u>Smelter Name</u>	<u>Smelter Country</u>	<u>3TG</u>
A.L.M.T. Corp.	Japan	Tungsten
Agosi AG	Germany	Gold
Aida Chemical Industries Co., Ltd.	Japan	Gold
Alpha	United States of America	Tin
AMG Brasil	Brazil	Tantalum
AngloGold Ashanti Corrego do Sitio Mineracao	Brazil	Gold
Argor-Heraeus S.A.	Switzerland	Gold
Asahi Pretec Corp.	Japan	Gold
Asahi Refining Canada Ltd.	Canada	Gold
Asahi Refining USA Inc.	United States of America	Gold
Asaka Riken Co., Ltd.	Japan	Gold
Aurubis AG	Germany	Gold
Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Philippines	Gold
Boliden AB	Sweden	Gold
C. Hafner GmbH + Co. KG	Germany	Gold
CCR Refinery - Glencore Canada Corporation	Canada	Gold
Changsha South Tantalum Niobium Co., Ltd.	China	Tantalum
Chenzhou Diamond Tungsten Products Co., Ltd.	China	Tungsten
Chimet S.p.A.	Italy	Gold
China Tin Group Co., Ltd.	China	Tin
Chongyi Zhangyuan Tungsten Co., Ltd.	China	Tungsten
CV Venus Inti Perkasa	Indonesia	Tin
D Block Metals, LLC	United States of America	Tantalum
Dowa	Japan	Tin
Dowa	Japan	Gold
Eco-System Recycling Co., Ltd. East Plant	Japan	Gold
EM Vinto	Bolivia (Plurinational State of)	Tin
Exotech Inc.	United States of America	Tantalum
F&X Electro-Materials Ltd.	China	Tantalum
Fenix Metals	Poland	Tin
Ganzhou Huaxing Tungsten Products Co., Ltd.	China	Tungsten
Ganzhou Seadragon W & Mo Co., Ltd.	China	Tungsten
Gejiu Kai Meng Industry and Trade LLC	China	Tin
Gejiu Non-Ferrous Metal Processing Co., Ltd.	China	Tin
Gejiu Zili Mining And Metallurgy Co., Ltd.	China	Tin
Global Advanced Metals Aizu	China	Tin
Global Advanced Metals Boyertown	Japan	Tantalum
Global Tungsten & Powders Corp.	United States of America	Tantalum
Gold Refinery of Zijin Mining Group Co., Ltd.	United States of America	Tungsten
Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	China	Gold
Guangdong Xianglu Tungsten Co., Ltd.	China	Tin
H.C. Starck Hermsdorf GmbH	China	Tungsten
H.C. Starck Inc.	Germany	Tantalum
H.C. Starck Tungsten GmbH	United States of America	Tantalum
Heimerle + Meule GmbH	Germany	Tungsten
Hengyang King Xing Lifeng New Materials Co., Ltd.	Germany	Gold
Heraeus Germany GmbH Co. KG	China	Tantalum
Heraeus Metals Hong Kong Ltd.	Germany	Gold
Hunan Chunchang Nonferrous Metals Co., Ltd.	China	Gold
Hydrometallurg, JSC	China	Tungsten
Ishifuku Metal Industry Co., Ltd.	Russian Federation	Tungsten
Istanbul Gold Refinery	Japan	Tungsten
Japan New Metals Co., Ltd.	Turkey	Gold
Jiangwu H.C. Starck Tungsten Products Co., Ltd.	Japan	Tungsten
Jiangxi Copper Co., Ltd.	China	Tungsten
JiuJiang JinXin Nonferrous Metals Co., Ltd.	China	Gold
	China	Tantalum

Jiujiang Tanbre Co., Ltd.	China	Tantalum
JX Nippon Mining & Metals Co., Ltd.	Japan	Gold
Kennametal Huntsville	United States of America	Tungsten
Kennecott Utah Copper LLC	United States of America	Gold
Kojima Chemicals Co., Ltd.	Japan	Gold
LS-NIKKO Copper Inc.	Republic of Korea	Gold
Magnu's Minerais Metais e Ligas Ltda.	Brazil	Tin
Malaysia Smelting Corporation (MSC)	Malaysia	Tin
Masan High-Tech Materials	Viet Nam	Tungsten
Materion	United States of America	Gold
Matsuda Sangyo Co., Ltd.	Japan	Gold
Melt Metais e Ligas S.A.	Brazil	Tin
Metallic Resources, Inc.	United States of America	Tin
Metallo Belgium N.V.	Belgium	Tin
Metallo Spain S.L.U.	Spain	Tin
Metalor Technologies (Hong Kong) Ltd.	China	Gold
Metalor Technologies (Singapore) Pte., Ltd.	Singapore	Gold
Metalor Technologies S.A.	Switzerland	Gold
Metalor USA Refining Corporation	United States of America	Gold
Metalurgica Met-Mex Penoles S.A. De C.V.	Mexico	Gold
Mineracao Taboca S.A.	Brazil	Tantalum
Mineracao Taboca S.A.	Brazil	Tin
Minsur	PERU	Tin
Mitsubishi Materials Corporation	Japan	Gold
Mitsubishi Materials Corporation	Japan	Tin
Mitsui Mining and Smelting Co., Ltd.	Japan	Gold
Mitsui Mining and Smelting Co., Ltd.	Japan	Tantalum
Nadir Metal Rafineri San. Ve Tic. A.S.	Turkey	Gold
Niagara Refining LLC	United States of America	Tungsten
Nihon Material Co., Ltd.	Japan	Gold
Ningxia Orient Tantalum Industry Co., Ltd.	China	Tantalum
O.M. Manufacturing (Thailand) Co., Ltd.	Thailand	Tin
O.M. Manufacturing Philippines, Inc.	Philippines	Tin
Ohura Precious Metal Industry Co., Ltd.	Japan	Gold
Operaciones Metalurgicas S.A.	Bolivia (Plurinational State of)	Tin
PAMP S.A.	Switzerland	Gold
PT Aneka Tambang (Persero) Tbk	Indonesia	Gold
PT Aries Kencana Sejahtera	Indonesia	Tin
PT Artha Cipta Langgeng	Indonesia	Tin
PT ATD Makmur Mandiri Jaya	Indonesia	Tin
PT Babel Inti Perkasa	Indonesia	Tin
PT Belitung Industri Sejahtera	Indonesia	Tin
PT Bukit Timah	Indonesia	Tin
PT Mitra Stania Prima	Indonesia	Tin
PT Panca Mega Persada	Indonesia	Tin
PT Prima Timah Utama	Indonesia	Tin
PT Refined Bangka Tin	Indonesia	Tin
PT Sariwiguna Binasentosa	Indonesia	Tin
PT Stanindo Inti Perkasa	Indonesia	Tin
PT Sukses Inti Makmur	Indonesia	Tin
PT Timah Tbk Kundur	Indonesia	Tin
PT Timah Tbk Mentok	Indonesia	Tin
PT Tinindo Inter Nusa	Indonesia	Tin
PX Precinox S.A.	Switzerland	Gold
Rand Refinery (Pty) Ltd.	South Africa	Gold
Resind Industria e Comercio Ltda.	Brazil	Tin
Royal Canadian Mint	Canada	Gold
Rui Da Hung	Taiwan, Province of China	Tin
SEMPA Joyeria Plateria S.A.	Spain	Gold
Shandong Gold Smelting Co., Ltd.	China	Gold
Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	China	Gold
Smelter not listed	China	Tantalum

SOE Shyolkovsky Factory of Secondary Precious Metals
 Soft Metals Ltda.
 Solar Applied Materials Technology Corp.
 Solikamsk Magnesium Works OAO
 Sumitomo Metal Mining Co., Ltd.
 Taki Chemical Co., Ltd.
 Tanaka Kikinzoku Kogyo K.K.
 TANIOBIS Co., Ltd.
 TANIOBIS GmbH
 TANIOBIS Japan Co., Ltd.
 TANIOBIS Smelting GmbH & Co. KG
 TANIOBIS Smelting GmbH & Co. KG
 Telex Metals
 Thaisarco
 Tin Smelting Branch of Yunnan Tin Co., Ltd.
 Tokuriki Honten Co., Ltd.
 Ulba Metallurgical Plant JSC
 Umicore Precious Metals Thailand
 Umicore S.A. Business Unit Precious Metals Refining
 United Precious Metal Refining, Inc.
 Valcambi S.A.
 Western Australian Mint (T/a The Perth Mint)
 White Solder Metalurgia e Mineracao Ltda.
 Wolfram Bergbau und Hutten AG
 Xiamen Tungsten (H.C.) Co., Ltd.
 Xiamen Tungsten Co., Ltd.
 XIMEI RESOURCES (GUANGDONG) LIMITED
 Yamakin Co., Ltd.
 Yokohama Metal Co., Ltd.
 Yunnan Chengfeng Non-ferrous Metals Co., Ltd.
 Zhongyuan Gold Smelter of Zhongjin Gold Corporation

Russian Federation	Gold
Brazil	Tin
Taiwan, Province of China	Gold
Russian Federation	Tantalum
Japan	Gold
Japan	Tantalum
Japan	Gold
Thailand	Tantalum
Germany	Tantalum
Japan	Tantalum
Germany	Tantalum
Germany	Tungsten
United States of America	Tantalum
Thailand	Tin
China	Tin
Japan	Gold
Kazakhstan	Tantalum
Thailand	Gold
Belgium	Gold
United States of America	Gold
Switzerland	Gold
Australia	Gold
Brazil	Tin
Austria	Tungsten
China	Tungsten
China	Tungsten
China	Tantalum
Japan	Gold
Japan	Gold
China	Tin
China	Gold