

Title:	Conflict Mineral Policy	Effective Date:	3/24/14	Policy #:	PROC-002
Dept:	Procurement	Periodic Review Date:	3/24/21	Revision #:	1

## CONFLICT MINERAL POLICY

### 1. PURPOSE

The purpose of this policy is to document the Company’s 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 new 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 employees within the company, but is most likely applicable to those employees in the Procurement, Engineering, Quality, Employee Health & Safety (EH&S), Marketing and Legal departments.

### 3. POLICY

American Outdoor Brands Corporation and its subsidiaries (“American Outdoor Brands,” “AOB” or “the Company”) is committed to full, timely and fair disclosure of information as it relates to complying with Section 1502 of the Dodd-Frank Act. As a publicly traded company it is our regulatory obligation to publicly disclose by May 31 of each year the use and source of any 3TG minerals necessary for the functionality or production of our products. To meet this regulatory requirement, AOB 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 our products, of which the results will dictate the Company’s SEC reporting requirements.

### 4. PROCEDURE

To meet its regulatory obligations, AOB has created a Conflict Minerals Standard Operating Procedure (CMSOP) document that outlines the Company’s guidelines for complying with Section 1502 of the Dodd-Frank Act. The CMSOP is available for review on the Company’s SharePoint site. While the CMSOP details the Company’s process for ensuring compliance with the SEC rule, the following is a high level outline of the Company’s program for reviewing potential use and sourcing of conflict minerals.

1. Annually, beginning around August of every year, the Director of Procurement will establish a team (“CM Team”) comprised of those key employees with the awareness and knowledge of 3TG necessary for the functionality or production of our products.

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2. A risk assessment will be conducted by the team to ascertain whether or not 3TG is used in the production or functionality of our 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 in question.
  - b. Upon receipt of the surveys, the team will review the responses for completeness and reasonableness.
  - c. If additional information is required the team will follow up with the specific 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 to date of its review to the SEC. By establishing an April cutoff date the Company has allocated enough time to complete the review and allow for timely SEC reporting.
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 will ensure that all key supporting documentation, including but not limited to the risk assessment, product taxonomy and supplier surveys, will be maintained in a project binder available for internal and external parties as needed.
6. On an annual basis, the Compliance Department along with the CM team will be responsible for identifying those employees determined to have applicability with regard to the use or functionality of any potential conflict minerals and they will be provided formal training with regard to the Company's compliance efforts with the SEC rule under 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 the 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**

Conflict Minerals Standard Operating Procedure

**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 or Chief Financial Officer.