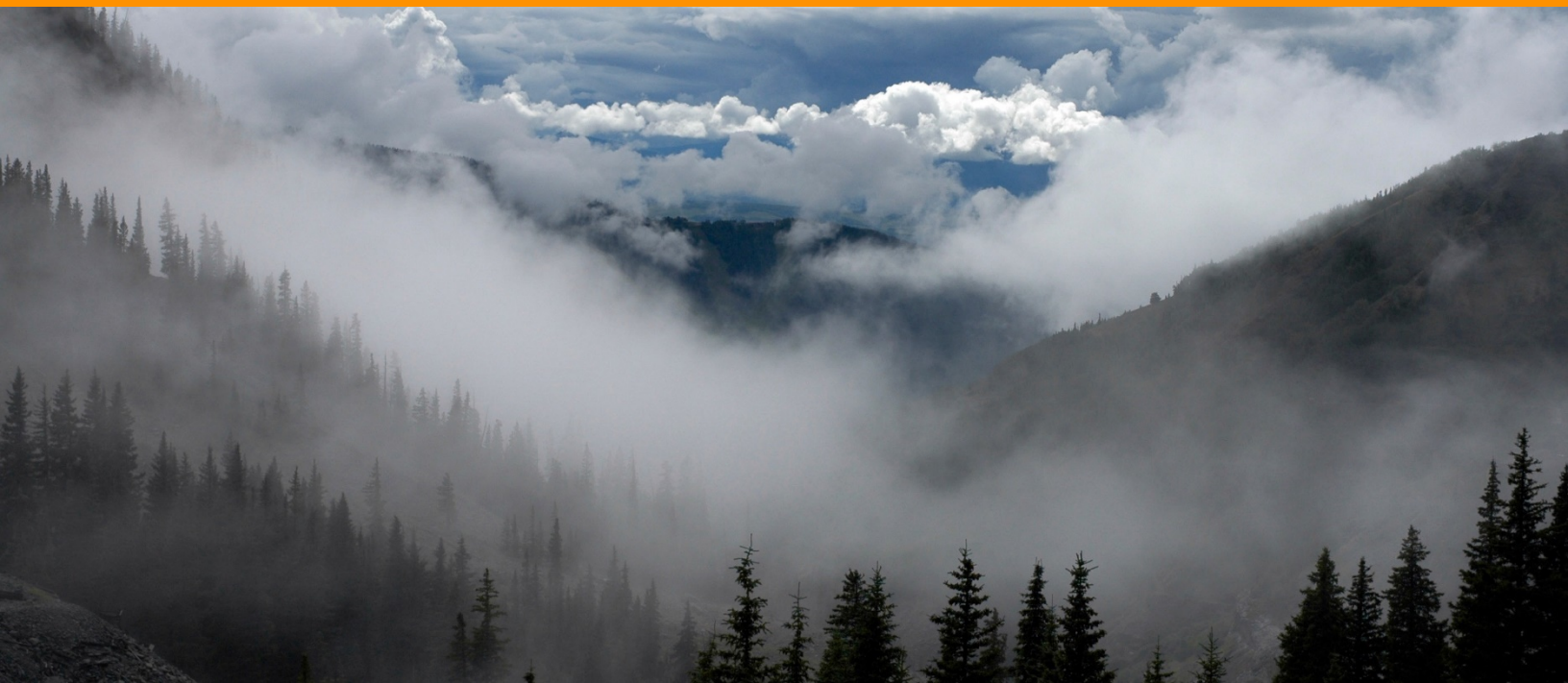




Code of Business Ethics

A Message from Our CEO





Dear Vista Outdoor Employee,

Vista Outdoor was built by the character of our employees and our passion for our work and our products. Our corporate culture is centered on ethics and integrity, which are key tenants of our corporate values. Our continued success depends on our resolve to uphold these values daily in our work and in our behavior.

We are firmly committed to conducting our operations ethically and in compliance with all the laws and regulations that govern our business. The way we conduct business with our co-workers, stockholders, customers, suppliers, competitors, regulatory agencies, and our communities shapes our corporate reputation – one of the most important assets we have. At Vista Outdoor, we stress that no success is worth the expense of compromising our integrity.

I am proud to work for a company that holds itself to the highest ethical standards. We believe in the fundamental truth of doing what is right, not what is easiest or most profitable. Our Code of Business Ethics outlines and reinforces our commitment to ethical behavior at every level. The Code is a tool for every employee to help make the right decisions and to resolve ethical issues you may encounter. Please read it carefully and often. Take responsibility for the behaviors and policies referenced and lead by example.

Managers and supervisors should share this document with every new employee, reference it when questions arise and seek appropriate support and guidance. If you have questions or concerns about any Vista Outdoor business or operation, please speak up. We encourage all employees to talk to your supervisor or manager, human resources, legal counsel, or the Ethics Office. You may also report any concerns through the Ethics Helpline that is available 24/7 at 1-844-286-0005 or at www.vistaoutdoorhelpline.ethicspoint.com. We're committed to creating a work environment that fosters open communication.

Thank you for your everyday efforts to follow our Code and support Vista Outdoor's values. I encourage you to "DO RIGHT, when no one is looking" by acting the right way, every day. Together our efforts build our business and strengthen our communities.

Chris Metz
Chief Executive Officer

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Vista Outdoor's Purpose, Vision & Commitment

Purpose, Vision & Commitment

Our Purpose:

To be known as a passionate outdoor company with the brands, products and culture that unite people around a shared love and responsibility for the outdoors.

Our Vision:

To build powerhouse brands that empower people to achieve their goals and live their best outdoor lives.

Our Commitment:

- **Invest in People:** A strategy is worthless without the right team. We recruit for, support and invest in talent that will be dedicated and confident employees who will deliver our long-term impact and success.
- **Create Safe Environments:** The well-being and physical safety of our employees, along with the safe design, manufacture and use of our products, is paramount to our purpose.
- **Lead through Innovation:** We challenge conventions and discover the unmet needs of our outdoor communities so we can create products to elevate the experience of our consumers. Pursuing innovation and maintaining high quality standards is in the DNA of Vista Outdoor, our processes and the performance of our products.
- **Promote Stewardship and Participation:** Our duty is to preserve wildlife and enhance the wild places where they live. We will be catalysts to advocate for policy that protects these spaces while ensuring responsible use and access for all. Furthermore, we will pursue sustainable business operations to ensure a light footprint on our environment.



Vista Outdoor's Code of Business Ethics

We all want Vista Outdoor to be successful. The way in which we conduct ourselves is equally important to the results we achieve. We must never compromise our integrity or ethics to achieve results. This is why we have an ethics and compliance program that helps define Vista Outdoor's commitment to legal and ethical conduct.

Our Code summarizes the standards that govern how we conduct our business. This Code is a common-sense guide to help you make ethical business decisions, raise your awareness of legal and ethical issues, and understand the process in place for dealing with those issues.

Using the Code of Business Ethics as Your Guide

Your Responsibilities

This Code applies to employees, Officers, and Directors of Vista Outdoor. You are expected to maintain high ethical standards, conduct your work with integrity and comply with Vista Outdoor policies and the law.

- Read, understand, and comply with the Code and the Vista Outdoor policies, laws, and regulations applicable to your job
- Obtain guidance for resolving a business practice or compliance concern or if you are uncertain about how to proceed in a situation
- Raise possible violations of the Code, policies, and legal and regulatory requirements
- Be truthful and cooperate fully in any investigations
- Complete annual training on the Code and when completed, attest to your understanding of and commitment to the Code

Speaking Up

When you have a question, need guidance, or suspect a violation of the Code, our policies, or applicable legal requirements has occurred (or may occur), then speaking up is the right thing to do.

1. Bring it to the attention of your local supervisor, or any member of local management, as appropriate. The most immediate resource for reporting good faith concerns of suspected violations is your immediate Supervisor or any member of local management. If you prefer not to go to your Supervisor, or your concern was not adequately addressed by your local supervisor or local management, other options are available.

2. Reports, concerns, and questions relating to banking, accounting, finance, internal accounting controls, bribery or anti-corruption, or antitrust/competition, and other topics covered in this Code may also be made directly, to any of the following:
 - a. Your Human Resources Department
 - b. Your Vista Outdoor Legal Counsel
 - c. Vista Outdoor's Ethics Office
 - d. In addition, reports may be made through Vista Outdoor's Ethics Helpline, which is managed by an outside service provider. Vista Outdoor's Ethics Helpline is available all day every day online at www.vistaoutdoorhelpline.ethicspoint.com and through dedicated phone numbers that are set out at the end of this Code.

Note: If you work outside of the United States, please refer to your local Data Privacy Compliance Guide for instructions about how the Ethics Helpline operates and what topics can be reported over the Ethics Helpline or to any Vista Outdoor representative outside of your country. If you are calling about a matter that should be handled locally in accordance with local legal requirements, you will be directed back to local management.

Vista Outdoor Response to Concerns

All concerns that are reported in good faith are taken seriously. We have an ethics investigation process that we use to guide our ethics investigations throughout Vista Outdoor. If your concern results in an ethics investigation, a trained ethics investigator will be assigned to conduct an impartial and thorough investigation in compliance with applicable law.

Sharing your identity when you report will help Vista Outdoor conduct the most thorough investigation possible. If, however, you are uncomfortable identifying yourself, you may report anonymously. Regardless of how you choose to report, the appropriate people will carefully investigate the report and take appropriate and necessary action. We all have a responsibility to cooperate with any investigation. During an investigation, you should be truthful, cooperative, and should preserve all relevant documents and information (including electronic documents and emails), as instructed by the investigator.

Note: Spain and some other countries prohibit anonymous reporting of complaints. If you work outside of the United States, please refer to your local Data Privacy Compliance Guide regarding whether you can legally make an anonymous complaint.



No Retaliation

Vista Outdoor will not tolerate retaliation against anyone who speaks up in good faith to ask a question, report a concern, or participate in an ethics or compliance investigation. When you step forward to report something that you believe is unethical or illegal, we will investigate and address the problem. Individuals who raise concerns or who help to resolve reported matters are protected from retaliation.

Serious Consequences for not Following the Code

Violations of legal requirements, our policies, or this Code may have severe consequences for you and Vista Outdoor, such as significant fines, penalties and a damaged reputation. Violations may jeopardize our relationships with customers and suppliers and could result in the loss of our ability to do business. Anyone who violates laws, regulations, our policies, or this Code may be subject to disciplinary action up to and including termination.

Waiving the Standards

This Code has been approved and adopted by Vista Outdoor's Board of Directors, and any amendment or waiver of this Code must be in writing and must be authorized by Vista Outdoor's Board of Directors or a committee thereof. Any such amendment or waiver that applies to one of Vista Outdoor's executive officers may be publicly disclosed if required by applicable laws or regulations.

Complying with Laws, Regulations and Vista Outdoor Policies





Antitrust, Sales Practices and Fair Dealings

Fair competition is fundamental to the free market system. The antitrust and competition laws are designed to preserve the free market system by ensuring vigorous competition that does not unfairly limit trade or exclude competition. At Vista Outdoor, we seek to outperform our competitors fairly and ethically, achieving competitive advantage through execution excellence and affordable, innovative, and quality products - never through unethical or illegal business practices.

While antitrust and competition laws can be complex, there are several basic principles that we should always follow. At a minimum, you should never:

- Make any agreement, formal or informal, with a competitor regarding pricing of our products in the marketplace, pricing practices, bids, bidding practices, terms of sale or marketing practices
- Agree with a competitor to divide customers, markets or territories
- Agree with a competitor not to deal with another company
- Attempt to control a customer's resale price
- Force a customer to buy one product in order to get another product
- Unreasonably restrict a customer's ability to deal with other companies
- Engage in price discrimination that unreasonably restrains competition or creates a monopoly
- Disparage a competitor or its products, misrepresent our products or services, or misrepresent the products or services of a competitor

Consequences for failure to comply with the antitrust and competition laws are extremely serious and include imprisonment for individuals and significant fines, penalties and expenses for the Company. You should consult with your Vista Outdoor Legal Counsel if you have any questions.

Gifts, Hospitality and Entertainment

Vista Outdoor requires the use of good judgment, discretion, and moderation when giving or accepting gifts or hospitality in business settings. We recognize that gift giving and hospitality practices may vary in different cultures; however, any gifts and hospitality given or received must always be in compliance with the law, not violate the policies of the giver or recipient, and be consistent with local custom and practice.

Employees may not give or receive gifts or hospitality from current or potential vendors, suppliers, customers or other business associates unless all of the following conditions are met:

- Is of a reasonable and nominal value
- Has a legitimate business purpose
- Does not interfere with the exercise of independent judgment in the best interests of Vista Outdoor
- Complies with law
- Is consistent with local custom and practice
- Does not violate the giver's or receiver's policies on the matter

Please note that the following gifts are always prohibited:

- Money or cash equivalents
- A bribe, kickback, or anything with corrupt intent or intent to influence
- Using your personal funds to accomplish what is otherwise prohibited by policy
- Gifts or hospitality to a public official's friend or family
- Anything of value that could create the appearance of impropriety or result in embarrassment to you or Vista Outdoor

Intellectual Property

We comply with the laws and regulations that govern the rights to, and protection of, our own and others' intellectual property including copyrights, trademarks, patents, and trade secrets.

Responding to Inquiries from the Media and the Investment Community

We all have a responsibility to protect Vista Outdoor's reputation through our behavior and performance. We also need to make sure that any legal obligations relating to Vista Outdoor's communications are met. Because of this, Vista Outdoor has authorized certain individuals—and only those individuals—to speak on behalf of Vista Outdoor. All media inquiries must be referred to Vista Outdoor Corporate Communications. Exceptions are allowed for local inquiries to business group or division employees who have responsibility for media relations. All inquiries related to a crisis situation must be forwarded to Vista Outdoor Corporate Communications. All contacts with stockholders, prospective investors and securities analysts, or requests for information related to Vista Outdoor's financial performance, must be referred to Vista Outdoor Investor Relations.

Appropriate Political Activity and Lobbying

Vista Outdoor participates in the political and legislative process to ensure that Vista Outdoor's interests are appropriately represented. Vista Outdoor fully complies with applicable laws and regulations to make certain that our political and lobbying activities are conducted in a legal, ethical and transparent manner. If you wish to contact officials to influence legislation, regulations or enforcement on behalf of Vista Outdoor, you must first obtain the approval of Vista Outdoor Government Affairs.

Employees are encouraged to exercise their right to participate in political activities. Any decision to become involved is entirely personal and voluntary. Note that all employees' personal political activities are engaged in on their own time and with their own resources.

No Bribery or Corruption

At Vista Outdoor, we do not engage in any form of bribery or kickbacks. You must never offer, give, solicit or accept any form of bribe or kickback in any aspect of our business, including our commercial transactions as well as our dealings with public officials (defined below) and employees. A bribe or kickback involves accepting or providing (directly or indirectly) money, gifts or anything of value to obtain or retain business, direct business to any other person or entity, or secure an improper advantage. Favorable treatment may appear innocent, but it is illegal when offered in exchange for a bribe or kickback. You should never offer or accept anything of value if you have the slightest doubt about the transaction.





Many anti-bribery laws like the U.S. Foreign Corrupt Practices Act (FCPA) and UK Bribery Act of 2010 specifically prohibit bribes to or for the benefit of public officials. The term “public official” is broadly defined and includes government officials including but not limited to an officer, employee or consultant of a government or governmental department or agency, officer or employee of a state-owned enterprise or partially state-owned enterprise, political party or official, candidate for political office, officer or employee of a public international organization such as the World Health Organization or World Bank, or the spouse or immediate family member of any of the persons mentioned above.

We comply with the standards of conduct set forth in the FCPA and the applicable anti-corruption and anti-money laundering laws of all the countries in which we operate. We never offer or accept a payment or gift that may be construed as illegal or improper regardless of local law or custom.

In certain parts of the world, it is common for low-level foreign government employees to ask for small payments to expedite or secure the performance of a routine governmental action, such as to obtain a visa or to schedule an inspection. Vista Outdoor has a clear policy prohibiting such “facilitating payments” without the review and expressed written approval of a Vista Outdoor Legal Counsel, no matter how common or ordinary the payment may appear. You should always consult your Vista Outdoor Legal Counsel if you have questions or concerns.

Because a third party acting on behalf of Vista Outdoor can expose the Company to liability under the FCPA, the UK Bribery Act of 2010, and other anti-bribery laws, great care must be taken in retaining representatives and other third parties. You must comply with Vista Outdoor’s policies and procedures, including our due diligence processes in the appointment, management and payment of third-party intermediaries, agents and distributors, who should also be informed of and comply with all applicable policies and laws.

Remember that simply offering a bribe or kickback to anyone is enough to violate Vista Outdoor policy and the law. Bribery and kickbacks are very serious crimes and it is important that Vista Outdoor does not allow even the appearance of impropriety. You should consult with Vista Outdoor Legal Counsel for further information.

To comply with anti-corruption laws, follow some basic rules:

- Do not offer to pay bribes to anyone
- Know your representative and ensure they are vetted, approved, and under applicable standard agreements with Vista Outdoor
- Charitable donations may not benefit public officials
- Transactions should be transparent
- Travel and lodging for officials must be appropriate and pre-approved by your Vista Outdoor Legal Counsel
- Gifts and hospitality for officials should be infrequent, reasonable, and pre-approved by your Vista Outdoor Legal Counsel
- Hiring decisions may not benefit public officials
- Facilitating payments are prohibited, unless pre-approved by your Vista Outdoor Legal Counsel
- Keep accurate books and records
- Immediately report actual or suspected violations to your Vista Outdoor Legal Counsel
- Retaliation for refusing to take or offer a bribe or kickback or for reporting concerns is not tolerated

No Vista Outdoor employee or Vista Outdoor representative will suffer adverse consequences for refusing to pay or take a bribe or kickback, even if this results in the loss of business to Vista Outdoor.

Compliance with Export and Import Controls

Vista Outdoor complies with international trade laws and regulations of the United States and all other countries where Vista Outdoor is located or does business, including export control, embargoes/sanctions and anti-boycott laws.

International trade laws and regulations govern the transfer between countries of goods, services and technology. These laws and regulations are complex, change frequently and apply to many aspects of our business. If you support actual or potential business outside of your country, you must be familiar with Vista Outdoor's policies and practices relating to international trade. Support activity can range from contact with a foreign national at a company facility during a plant tour or trade show to sending a product formulation to an overseas supplier or submitting a proposal to a foreign government. Make sure you review and understand the regulatory requirements before engaging in international business.

We also must not cooperate with any restrictive trade practices or boycotts that are prohibited or penalized under U.S. anti-boycott laws. Even when we are not conducting business in the U.S., we must comply with such laws.

Penalties for violations of international trade laws can be severe, including fines, imprisonment or debarment from government contracting. You should consult with your business' International Trade Operations or your Vista Outdoor Legal Counsel if you have any questions.



Ensuring a Diverse, Respectful and Safe Workplace

Open, Fair and Respectful

We are committed to ensuring a workplace that drives the success of Vista Outdoor by working together respectfully and inclusively. We each play a role in creating and maintaining this type of environment. In our relationship with each other, we strive to be open, honest, and respectful in sharing our ideas and in listening to the ideas of others; together we drive innovation, execution excellence, quality, and success.

Diversity

We understand that attracting and retaining a diverse workforce is critical to business success because it fuels our ability to creatively respond to emerging needs for new technology and product development. Vista Outdoor is committed to a policy of providing employment opportunity to all qualified employees and applicants in compliance with applicable law. We value the diversity of background, culture and beliefs that our employees bring to Vista Outdoor and we are proud that our workplace offers equal opportunity for advancement, personal development and professional growth.

Harassment, Discrimination and Retaliation

We all have the right to work in an environment free from harassment, discrimination, intimidation, and retaliation. “Harassment” is generally a form of discrimination that consists of unwelcome behavior, based on a person’s protected characteristic or status, which has the purpose or effect of creating an intimidating, hostile or offensive work environment. Harassment can come in many forms, including physical actions, verbal or written remarks, or visual depictions. Vista Outdoor strictly prohibits any acts of harassment, whether done by an employee or a non-employee.

Each of us is responsible for understanding all applicable workplace laws against discrimination, harassment, and retaliation and for using good judgment in our decision making and for treating others with professionalism and respect.

Acceptable Use of Information Technology

We must follow all applicable authorization protocols and acceptable use and information security policies when using Company-provided technology, devices, services, or related content.

We should only access the libraries, files, data, programs and directories that are related to our work duties and to which we have authorized access. Circumventing user authentication or IT security protocol to gain access to areas of the Vista Outdoor network to which you have not been granted authority is strictly prohibited.



Always remember that your communications should be professional and work-related, we do not create, access, store, print, request, or send any material that is intimidating, violent, harassing, threatening, sexually explicit (including nudity), or otherwise offensive or inappropriate in the workplace. We also do not send false, derogatory, or hateful communications.

Safety and Health

Vista Outdoor is firmly committed to providing a safe and healthy work environment. We comply with applicable workplace safety and health regulations in operating our business.

To help us to meet this commitment, you should:

- Take responsibility for your personal safety as well as the safety of your fellow employees
- Promptly identify and report all potential hazards in the work environment
- Follow all policies, procedures, work instructions, and safety protocols
- Identify any possible changes or improvements to your Supervisor
- Stop operations if you are unsure of the work instructions or see something that is unsafe
- Eliminate distractions and maintain focus on the task at hand
- Only perform work tasks that you are trained and authorized to perform

Working safely is everyone's responsibility. If you become aware of a safety concern, please bring it to the attention of your Supervisor.

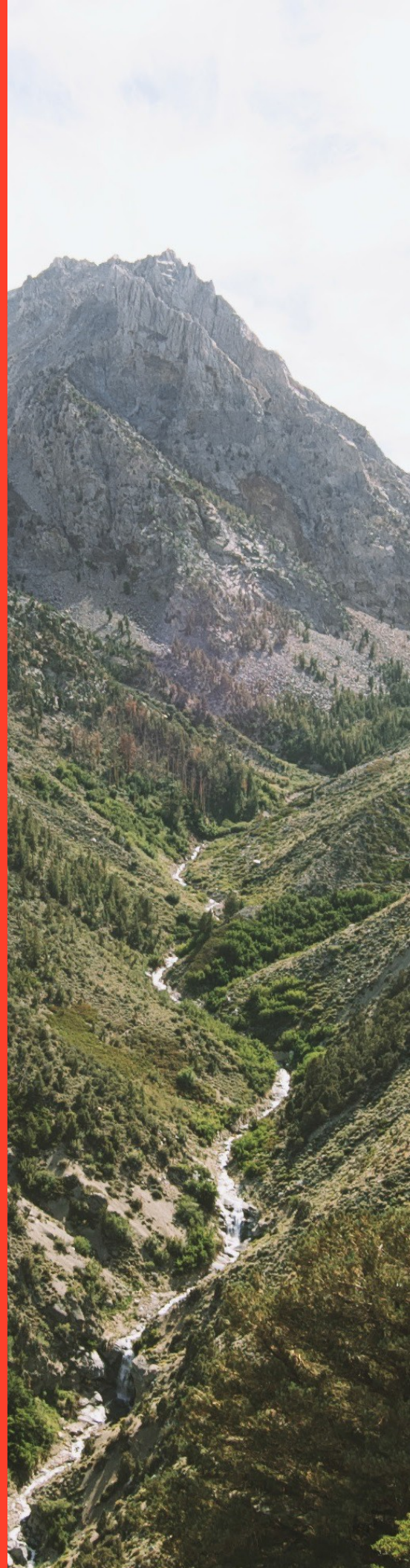
Substance Abuse

Employees are prohibited from manufacturing, distributing, dispensing, possessing, using, or being under the influence of illegal drugs in the workplace. Engaging in any of these activities can negatively impact workplace safety, quality, and efficiency. You need to use good judgment and come to work ready to perform at your best.

Bullying and Workplace Violence

Vista Outdoor does not tolerate bullying, intimidation, threats or physical violence in the workplace. Vista Outdoor takes very seriously any conduct or behavior that threatens the safety of our employees. Anyone engaging in conduct that is unsafe or violent toward other employees or Vista Outdoor's property will be immediately removed from the workplace.

Using Our Resources and Assets Responsibly





Conflicts of Interest

When conducting business on behalf of Vista Outdoor, you must be careful to avoid situations that could create a conflict of interest, or even the appearance of one. A “conflict of interest” occurs when an employee’s interests, or the interests of an employee’s family member, conflict with the employee’s ability to perform his or her job responsibilities or to act in the best interests of Vista Outdoor. The employee does not need a direct personal conflict for there to be a potential conflict of interest. It is possible that the indirect interests of an employee’s family member could be sufficient to create a potential conflict of interest. Such competing interests may limit your ability to perform your job objectively and without bias.

When a family or romantic relationship exists between employees, it may appear as though one of us is receiving preferential treatment over another. Therefore, no employee should have direct decision-making authority over a family member or someone with whom the person has a romantic relationship.

A perceived conflict of interest is also created if you, or your family member or a close friend holds a substantial financial interest in an actual or potential supplier, client, or competitor of Vista Outdoor.

Investing can become a conflict of interest if you invest in a company that does business with or competes with Vista Outdoor.

Recognizing a Conflict of Interest

A conflict of interest exists when your circumstances would lead a reasonable person to question whether you were acting in the best interests of Vista Outdoor. A conflict of interest can arise in many situations, including:

- Family and romantic relationships with other employees or the employees of our suppliers, partners, or customers.
- Giving or receiving gifts, hospitality, or travel.
- Dealing with family members employed by a vendor or partner.
- Dealing with a vendor or partner in which you or a family member have a financial interest.
- Outside work activities.

Promptly report any actual or potential conflict of interest to your Supervisor and Vista Outdoor Legal Counsel. Work with your Supervisor to remove yourself from the conflicting situation.



Outside Employment

Before you accept outside employment or even a volunteer position, consider carefully whether the outside activity will create a conflict of interest with your work at Vista Outdoor. Generally speaking, working for or providing services to any Vista Outdoor customer, subcontractor, distributor, competitor or supplier will pose a personal conflict of interest and must be approved by your Supervisor. Even where outside employment or activities are approved, they must never interfere with your job responsibilities at Vista Outdoor. Putting Vista Outdoor first means giving your work at Vista Outdoor your full attention.

Business Opportunities

If you become aware of a business opportunity that may be of interest to Vista Outdoor, you may not divert that opportunity for your own personal gain or for the benefit of another company. Also, you may not use your position with Vista Outdoor, or Vista Outdoor customer information or property, in competition with Vista Outdoor, either directly or indirectly.

Managing and Protecting Information



Records Management

We create, retain, and dispose of our business records and information assets, both hard copy and electronic, as part of our normal course of business and in compliance with policy. Vista Outdoor has established record retention requirements and policies that comply with our legal obligations and business requirements.

Proprietary Information

During your employment with Vista Outdoor, you will have access to proprietary information and trade secrets of Vista Outdoor and our partners, vendors, customers, suppliers and other third parties. Such information is part of Vista Outdoor's competitive advantage and derives value from being held confidential. It includes, but is not limited to:

- Business proposals and pricing
- Customer and supplier information
- Manufacturing methods
- Engineering designs or other product data
- Inventions or improvements any employees make in the course of their work at Vista Outdoor
- Advice from legal counsel
- Other sensitive information that is not publicly available

All of us must act responsibly when it comes to the access, use, handling and disclosure of proprietary information in order to ensure the information is used only for Vista Outdoor's legitimate business purposes and is not disclosed to others without authorization. This duty exists not only while you are a Vista Outdoor employee, but even after you leave Vista Outdoor.

Access, Use and Protection of Proprietary Information

Vista Outdoor's proprietary information must be used only for legitimate Vista Outdoor business purposes.

- Do not use Vista Outdoor's proprietary information for your own personal benefit or to benefit someone else
- Do not share Vista Outdoor's proprietary information with friends, family members, or anyone either inside or outside of Vista Outdoor without authorization
- Do not assume that a co-worker has authorization to all information that you possess
- Do not discuss proprietary information in public places, including Company common areas like lobbies, hallways, or breakrooms
- Do discuss proprietary information with other Vista Outdoor employees only on a need-to-know basis; seek guidance from your Supervisor if you are unsure
- Do not work with documents containing proprietary information in public places or leave such documents unattended in public places

Competitive Information

Just as Vista Outdoor values and protects our own proprietary information and that of our partners, customers and suppliers, we also respect the proprietary information of our competitors.

Here are some basic rules to follow:

- Do not bring any material from a prior employer to Vista Outdoor
- Do not accept or use anyone else's proprietary information
- Do not solicit proprietary information from another company's employees, former employees, suppliers, distributors or customers

Know that we do have an obligation to keep up with developments in our industry and we should have an intimate understanding of our markets. We obtain information about our competitors through honest, transparent, and legal methods.

Accurate Recordkeeping

Each of us has the responsibility to ensure that all of Vista Outdoor's records are accurate, timely and complete. Proper authorization must be obtained before incurring, paying or transferring Vista Outdoor funds and assets. Forecasts and assessments provided to management must be done in a timely manner.

If you see an error or omission in a Vista Outdoor document, report it immediately to your Supervisor, Vista Outdoor's Internal Audit Department, or Vista Outdoor's Ethics Helpline. You should never direct anyone to prepare or approve a misleading record. It is no defense to say someone else directed you to create a record that you knew or had reason to suspect was false or misleading.

Accuracy in Financial Reporting

All disclosures made in financial reports and public documents filed with the U.S. Securities and Exchange Commission, or other regulatory authority, and other public communications, must be full, fair, accurate, timely and understandable. If you are involved in the preparation of these filings, you must work to ensure that the information contained in these filings accurately reflects Vista Outdoor's operations and financial condition.



Truth and accuracy in reporting is required. Vista Outdoor will not tolerate the creation or approval of records that are inaccurate, false or misleading. Prohibited conduct includes:

- Inaccurately recording time for reporting purposes
- Falsifying quality, environmental or safety reports
- Processing or submitting false or inaccurate invoices
- Recording false revenue
- Understating or overstating known liabilities or assets
- Submitting inaccurate expense reports
- Altering, removing or destroying documents except in accordance with Vista Outdoor's policies
- Approving inaccurate information for publication or other use

Consequences for providing false or misleading financial reporting are extremely serious and include imprisonment for individuals and significant fines, penalties and expenses for the Company. You should consult with Vista Outdoor Legal Counsel if you have any questions.

Insider Trading and Tipping

If you are aware of material nonpublic information ("inside information") relating to Vista Outdoor or our business, you may not buy, sell or trade Vista Outdoor stock or securities. In addition, you may not trade in stock or securities of another company (for example, Vista Outdoor's customers, suppliers, vendors, subcontractors and business partners) if you have material nonpublic information about that company that you obtained at Vista Outdoor. It is also unlawful for you to "tip" others, or pass along inside information to friends, family or others to help them make a profit, avoid a loss, or suggest that they trade when you are not permitted to do so.

What is material information? It depends on the facts and circumstances, but it is information that would be important to an investor in deciding whether to buy, sell or hold stock of a company. Material information includes:

- Earnings results or estimates, or other important financial information
- A proposal, negotiations, or agreement for a significant merger, acquisition, divestiture or joint venture
- A significant new contract or change in a significant contract
- A significant new product or development
- Significant litigation

You may not trade in Vista Outdoor stock or securities (or the other company's stock or securities) when you have material inside information until this information is publicly announced. If you have a question about whether information is material nonpublic information or any other questions about your securities trading, please check with Vista Outdoor Legal Counsel.

Protecting Personal Information

As part of your job, you may have access to personal information regarding other employees or applicants for employment. At Vista Outdoor, we respect the privacy rights and interests in personal information that is collected, held and used in our business. Everyone who handles personal information as part of their job must do so only on a “need to know” basis and for legitimate business purposes. We all have a duty to protect and safeguard personal information in accordance with Vista Outdoor policies.

Social Media

We recognize that social media plays an important role in how people communicate and interact in society today. When using social media and networking, we will protect proprietary and other controlled information and use good judgment.

Here are some basic rules to follow:

- If you reveal yourself as a Vista Outdoor employee, do make it clear that the views expressed are yours alone and not the views of Vista Outdoor
- Do not post or discuss proprietary information, trade secrets, classified data or information subject to export control requirements
- Do not disclose nonpublic information regarding Vista Outdoor’s financial performance or that might affect the price of Vista Outdoor stock or other securities
- Do use common sense and be honest, accurate, and ethical at all times
- Do not make misleading or defamatory statements about Vista Outdoor or its employees, customers, partners or affiliates
- If you comment on any of Vista Outdoor’s products or services, do ensure your comments reflect your honest beliefs, identify yourself as a Vista Outdoor employee, and state that the views expressed are yours alone and do not necessarily reflect the views of Vista Outdoor.





Responsible Business Leadership, Citizenship and Community Engagement



Community Engagement

Community service is a large part of Vista Outdoor's culture. We believe to whom much is given, much is expected, and so we make it a priority to give back to our neighbors and the communities in which we do business.

Product Quality and Safety

We must ensure that all of our products are designed and manufactured in compliance with all applicable safety laws and regulations, quality requirements and specifications. Our customers depend upon us for reliable, safe and quality products. It is never okay to cut corners, falsify documentation, skip an inspection or use an undocumented process. Our customers depend on each of us to get it right and do it right, every time, all the time.

Suppliers

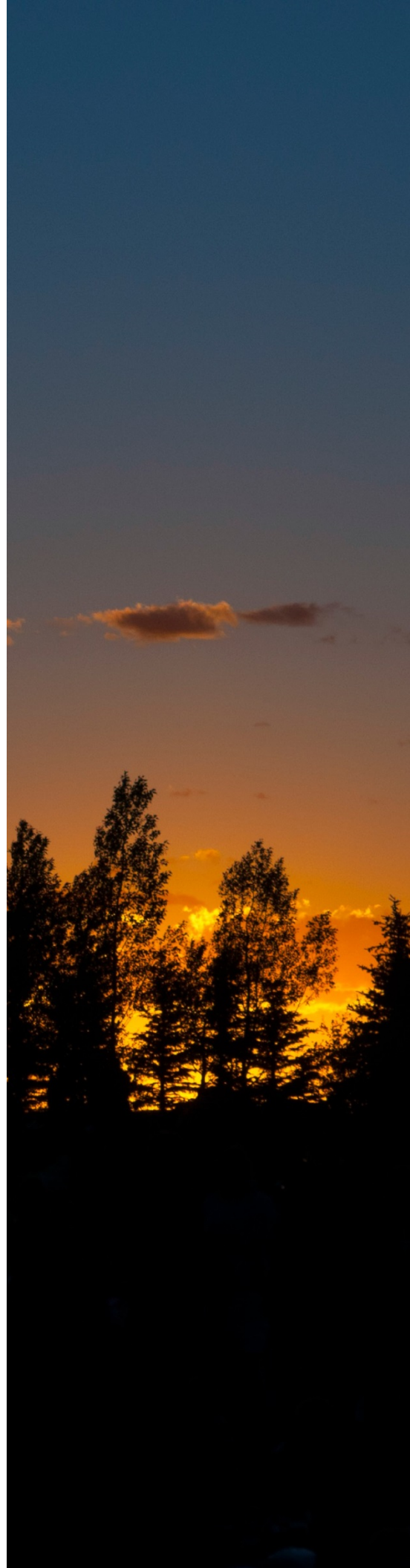
We expect our suppliers to help us to deliver value to our customers by providing Vista Outdoor with the highest quality products delivered on time and at the best value. Vista Outdoor partners with suppliers who demonstrate proven capabilities and adherence to quality, cost and schedule commitments. It is Vista Outdoor's policy to actively pursue opportunities to assist small businesses and diversity companies in becoming qualified and valued Vista Outdoor suppliers.

We expect our suppliers to follow all applicable laws and Company policies, including all laws governing anti-corruption, bribery, money laundering and anti-boycott. We require Suppliers to treat workers fairly, provide a safe and healthy work environment, and protect natural resources. Suppliers should seek to minimize the environmental impact of their operations and reduce waste, emissions, energy consumption and the use of materials of concern. Vista Outdoor expects suppliers to treat their workers with integrity and respect and to follow all applicable labor, human rights, health, and safety laws. We prohibit and will not tolerate trafficking in persons or the use of forced or child labor. Suppliers are required to comply with this prohibition and take affirmative steps to combat trafficking in persons and forced or child labor.

Environmental Compliance and Stewardship

We strive to minimize the impact of Vista Outdoor's operations on the environment and to proactively incorporate environmental initiatives into Vista Outdoor's day-to-day operations. Environmental concerns and requirements should be evaluated and addressed during all phases of facility modifications, acquisitions and divestitures, and facility closures.

We comply with applicable environmental laws. If your job involves the handling, transportation or disposal of raw materials, products or wastes, you should ensure that these activities are done in a safe and environmentally responsible manner. If you become aware of a spill or a release into the environment, you must notify both your Supervisor and the facility environmental department immediately so the appropriate spill response activities can be initiated.



Have a question? Need guidance? Raising a concern? The Ethics Helpline is available seven days a week, 24 hours a day. Call the Ethics Helpline at the numbers listed below or report your concern online at www.vistaoutdoorhelpline.ethicspoint.com

Country	Type	Provider/Carrier	Access Code	Phone Number
United States	Domestic			844-286-0005
Canada	Domestic			844-286-0005
Puerto Rico	Domestic			844-286-0005
Australia	ITFS			1-800-10-7691
France	ITFS			0800-91-4044
Hong Kong	ITFS			800-960-818
Italy	ITFS			800-798524
Mexico	ITFS			001-855-617-2303
United Kingdom	ITFS			0808-234-6304
China (<i>Southern</i>)	WWC		10-811	844-286-0005
China (<i>Northern</i>)	WWC		108-888	844-286-0005
Germany	WWC		0-800-225-5288	844-286-0005
Ireland (<i>UIFN</i>)	WWC		00-800-222-55288	844-286-0005
Ireland	WWC		1-800-550-000	844-286-0005
Philippines (<i>PLDT – Tagalog Operator</i>)	WWC		1010-5511-00	844-286-0005
Philippines (Globe, Philcom, Digitel, Smart)	WWC		105-11	844-286-0005
Spain	WWC		900-99-0011	844-286-0005
Switzerland	WWC		0-800-890011	844-286-0005
Taiwan	WWC		00-801-102-880	844-286-0005



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