

Vista Outdoor Supplier Social Responsibility Code

Vista Outdoor Inc. and its subsidiaries are committed to conducting business in a lawful, ethical and socially responsible manner globally. To that end, we place a high priority on environmental stewardship, compliance with laws, and the rights, safety and well-being of workers throughout our supply chain. This social responsibility code (“Code”) sets out our minimum expectations of suppliers and provides a baseline against which our suppliers are evaluated.

1. **Voluntary Labor.** All labor shall be voluntary. Suppliers shall not directly or indirectly retain labor by limiting access to identity or immigration documents, charging workers deposits or recruitment fees, or using actual or threatened force, restraint, involuntary servitude or abuse of legal process. Suppliers shall not directly or indirectly participate in human trafficking, and shall comply with all United States and any local country laws pertaining to voluntary servitude, including but not limited to the Human Trafficking Regulations under the United States Federal Acquisition Regulations (FAR) / United States Defense Federal Acquisition Regulations (DFAR) (FAR subpart 22.17; DFAR subpart 222.17). Suppliers shall not directly or indirectly source goods or materials from the Xinjiang region of China.
2. **Working Conditions.** Workers must have a safe, healthy and sanitary work environment and shall be treated with respect. Suppliers shall not:
 - Employ physical, sexual, verbal or mental abuse, coercion or harassment;
 - Recruit, harbor, provide or obtain a person for the purpose of committing a sex act in exchange for anything of value;
 - Employ workers less than the minimum age required by local law, or 15 years old, whichever is older;
 - Conceal or mislead applicants about key employment terms, including hazards, conditions and wages;
 - Restrict worker membership in trade unions or the free association of workers; or
 - Discriminate on the basis of race, gender, religion, nationality, ethnic origin, sexual orientation, disability, age, union membership, political affiliation or other protected classes.
3. **Wages, Benefits and Hours.** Workers must be paid wages, overtime and benefits that meet or exceed local legal requirements and provide for essential needs. Work weeks cannot exceed the maximum amount allowed by local law, and workers shall have at least one day off on average per week.
4. **Environmental Stewardship.** Suppliers are expected to meet or exceed all applicable regulatory requirements regarding emissions, releases, hazardous waste and water discharge, and continually improve to reduce natural resource consumption and the environmental impacts of their operations.
5. **Ethical Conduct.** Suppliers shall conduct business with integrity and in compliance with all applicable laws, and respect the intellectual property rights of others. Suppliers shall comply with all anti-corruption laws, including the US Foreign Corrupt Practices Act and the OECD Anti-Bribery Convention, and shall not pay, give or offer anything of value, including but not limited to bribes, kickbacks and facilitation payments, to any government official or anyone working for or on behalf of any government, government agency or quasi-governmental entity (*e.g.*, customs officials). Suppliers are expected to honor these principles in their sourcing practices, including by knowing the origin of the materials they use and avoiding the use of conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

Suppliers are expected to report any suspected violations of this Code, and comply with Vista Outdoor’s reasonable requests to validate compliance with this Code, including by completing information surveys, certifying compliance, providing records and allowing audits and inspections. Any noncooperation or violations will constitute a material breach and factor heavily into Vista Outdoor’s decision to do business with suppliers.