

Political Disclosure & Compliance

Vista Outdoor participates in the U.S. political process to ensure that the corporation's interests in the sporting industries, contracting, and outdoor recreation industries, and those of a large employer, are appropriately represented. Vista Outdoor and its employees have legitimate interests in public policy and decisions that are made by public officials and have a direct impact on our business. Vista Outdoor fully complies with all federal and state laws and regulations to make certain that political activity and lobbying expenditures are conducted in a legal, ethical and transparent manner and are consistent with Vista Outdoor's [Code of Business Ethics](#). All such activities are made solely in the interests of Vista Outdoor shareholders, customers and employees, and are not based on the personal agendas of individual employees, officers or directors.

Direct Corporate Contributions

Vista Outdoor does not have plans to spend corporate funds for political contributions to any political party or candidate for federal public office, or in support of any ballot initiative or political committee. Should Vista Outdoor or any of its subsidiaries decide at a later date to engage in such activity at either the federal or state level, all transactions will be conducted in accordance with applicable laws and regulations, and disclosed on the appropriate federal or state website.

Independent Expenditures and Public Communications

Vista Outdoor has no plans to spend corporate funds for the direct funding of independent expenditures or communications to the general public expressly advocating for or against candidates in elections for public office, or for ballot initiatives or other legislative outcomes.

Federal Lobbying Expenditures and Disclosures

Vista Outdoor engages in the legislative process to communicate its views on legislative and regulatory matters affecting Vista Outdoor's businesses, employees, shareholders and customers. Federal lobbying activities are regulated by the Lobbying Disclosure Act (LDA) of 1995 as amended, and other applicable laws and regulations.

In full compliance with the LDA, Vista Outdoor's federal lobbying activities and expenses are defined by Section 162(e) of the Internal Revenue Code. Vista Outdoor is registered with the Secretary of the U.S. Senate and Clerk of the U.S. House of Representatives, and files lobbying reports on a quarterly basis. All reports are disclosed publicly and can be viewed on the U.S. Senate and the House of Representatives websites.

In addition, all Vista Outdoor employees who are registered federal lobbyists must publicly file individual semi-annual contributions disclosure reports per LDA requirements.

State and Local Lobbying Expenditures and Disclosures

In any instance in which Vista Outdoor engages in state or local lobbying activities, Vista Outdoor will fully comply with all governing rules, regulations and transparency measures required by the individual state. Disclosure of such activity, if engaged in, will be provided on this website.

Trade Associations

Vista Outdoor is a member of a number of trade associations and pays annual dues for these memberships. Trade association memberships must be approved by executive leadership and are primarily managed by Vista Outdoor's Vice President of Public Affairs. The primary purpose of membership in these trade associations is the general business, technical and industry expertise these organizations provide. Trade associations take a wide variety of positions on various matters, not all of which Vista Outdoor supports. In those cases, Vista Outdoor engages with the association leadership and other constituencies to express Vista Outdoor's views.

Some trade associations apply a portion of membership dues to nondeductible state and federal lobbying and political expenditures. According to the requirements of Section 162(e)(1) of the Internal Revenue Code, trade associations to which Vista Outdoor pays membership dues must provide Vista Outdoor with the percentage of those dues that are attributable to lobbying expenses. The Outdoor Industry Association, National Council on International Trade Development, and National Foreign Trade Council are trade associations to which Vista Outdoor pays annual dues and the portion of those dues that were nondeductible under Section 162(e)(1) of the Internal Revenue Code.

Some trade associations do not apply a portion of membership dues to nondeductible state and federal lobbying and political expenditures. The National Shooting Sports Foundation is a trade association that does not apply a portion of membership dues to nondeductible state and federal lobbying and political expenditures to which Vista Outdoor pays annual membership dues of \$25,000 or greater.

Vista Outdoor is not a member of, nor does Vista Outdoor make any payments to, any tax-exempt organization that writes and endorses model legislation, other than the trade associations in the lists above. Any changes will be disclosed on this website.

Vista Outdoor PAC Activity and Disclosure

Vista Outdoor offers eligible employees an opportunity to make voluntary political contributions through the Vista Outdoor Employee Citizenship Fund (Vista Outdoor PAC). Vista Outdoor PAC is an independent, nonpartisan, voluntary fund that supports candidates for the U.S. Senate and House of Representatives. Vista Outdoor PAC is registered with the Federal Election Commission (FEC), and all activities are reported and publicly disclosed in compliance with FEC regulations. In accordance with FEC regulations, only exempt, salaried Vista Outdoor employees will be solicited to consider supporting Vista Outdoor PAC.

Vista Outdoor PAC files FEC reports monthly during election years and semi-annually during non-election years. Reports disclose all required FEC information, including Vista Outdoor PAC

financial information, employee contributions and federal candidate contributions. All Vista Outdoor PAC FEC reports are publicly disclosed on the FEC website.

Vista Outdoor PAC is governed by a board of directors appointed by Vista Outdoor's CEO. Vista Outdoor PAC is managed in accordance with the Vista Outdoor PAC bylaws which are reviewed and approved by the Vista Outdoor PAC board. Vista Outdoor PAC activities and political expenditures are subject to Vista Outdoor's periodic internal audit process.

Political Compliance Process

Vista Outdoor maintains a thorough compliance process, managed by Vista Outdoor's Vice President of Public Affairs and supported by the Vista Outdoor Legal Department, to ensure that Vista Outdoor's political activities are lawful, properly disclosed and aligned with Vista Outdoor's [Code of Business Ethics](#).

Management Oversight

Vista Outdoor's Board of Directors and management exercise appropriate oversight of Vista Outdoor's political activities. Vista Outdoor's Vice President of Public Affairs ensures that all political activity is in compliance with federal laws and regulations, and Vista Outdoor's policy regarding political disclosure and compliance, and provides regular updates to the Board and management team.