



VISTA OUTDOOR INC. SUPPLY CHAIN TRANSPARENCY DISCLOSURE

At Vista Outdoor we insist on ethical behavior and respect for human rights, and require that our suppliers do the same. Our Supplier Social Responsibility Code outlines and reinforces our commitment to ethical behavior at every level. This Disclosure provides additional information about the efforts of Vista Outdoor and its subsidiaries as required by the California Transparency in Supply Chains Act and the UK Modern Slavery Act 2015.

Risk Assessment

Vista Outdoor has engaged a third party agency to help assess the risk of slavery and human trafficking in our supply chain. The evaluation will examine risks across multiple areas, including geographic region, wages and hours, worker documents, compliance with human trafficking laws, and sub-supplier diligence. This evaluation will be performed on an annual basis.

Supplier Audits

Vista Outdoor currently does not perform audits on suppliers, but we will continuously evaluate their benefits as we assess and monitor the risks of human trafficking in our supply chain.

Certification

Vista Outdoor includes a clause in its contractual Terms and Conditions of Purchase that requires our suppliers to certify their compliance to human trafficking standards. As a condition of doing business with us, our suppliers warrant that “all Goods and Services (including materials incorporated into the Goods) . . . are manufactured in compliance with the laws regarding human trafficking and slavery in the country or counties in which they are made.” During our initial human trafficking risk assessment, and annually thereafter, our suppliers will further be required to affirmatively certify their compliance to Vista Outdoor’s Supplier Social Responsibility Code.

Accountability Standards

We maintain a 24-hour ethics hotline where employees may anonymously report violations of the law or our Social Responsibility Code. Any employee or supplier found to be in violation of our standards will be subject to remedial action, up to and including termination.

Training

Vista Outdoor has partnered with a leading corporate responsibility consultancy and has provided its supply chain staff, including supply chain management, with training on this subject. The annual course provides awareness on human trafficking and slavery, information on how to identify human trafficking and slavery risks in a supply chain, and prevention and mitigation efforts when human trafficking is suspected.

Vista Outdoor is committed to doing its part to help mitigate the risks of human trafficking in its supply chain.

/s/ Scott D. Chaplin, Senior Vice President, General Counsel and Secretary

Vista Outdoor Inc.