

## Revelyst, Inc.

### Code of Business Ethics

#### A Message from Our CEO

Dear Revelyst Employee,

Revelyst was built by the character of our employees and our passion for our work and our products. Our name combines “revel,” to experience with abandon, and “catalyst,” an unwavering source of transformation. Revelyst is authentic to our roots as makers and innovators, and highlights who we want to be: A transformative collection of brands who help people achieve all that is humanly possible outdoors.

Our symbol, the Dragonfly, unites our collective of makers. In each of its four powerful wings we find what it means to be a Revelyst:

- **Innovation:** With omni-directional flight and outsized endurance, this innovation of the natural world mirrors our relentless pursuit of challenging convention.
- **Leadership:** An apex predator at the top of its domain and a symbol of our category-defining brands and our ability to excel against the competition.
- **Inclusivity:** A universal symbol for living life to the fullest and an embodiment of our purpose to help everyone achieve their greatest experiences in the places they love.
- **Ecosystems:** A bellwether of healthy environments and clean water, we benchmark our commitment to the outdoors with a holistic view.

Equally important is a corporate culture that’s centered on ethics and integrity, which are key tenets of Revelyst’s 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 Revelyst, 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 refer to it 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 Revelyst 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 833-935-3286 or at [revelyst.ethicspoint.com](https://revelyst.ethicspoint.com). We're committed to creating a work environment that fosters open communication.

Thank you for your steadfast efforts to follow our Code and support Revelyst's values. I encourage you to "do the right thing when no one is looking" by acting the right way, every day, in all endeavors. Together, our efforts will strengthen our community and bolster our business.

Eric Nyman

Chief Executive Officer

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## **Revelyst'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 individuals to achieve their goals and live their best outdoor lives.

#### **Our Commitment:**

- **Invest in People and Communities:** 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 Revelyst, our processes and the performance of our products.
- **Promote Responsible Stewardship of the Outdoors:** 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.

## **Revelyst's Code of Business Ethics**

*We all want Revelyst 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 Revelyst's commitment to legal and ethical conduct.*

*Our Code of Business Ethics (the "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.*

*This Code may be amended only by resolution of the Board of Directors of Revelyst (the "Board").*

## **Using the Code of Business Ethics as Your Guide**

### **Your Responsibilities**

This Code applies to all employees, officers, and directors of Revelyst. You are expected to maintain high ethical standards, conduct your work with integrity and comply with Revelyst's policies and the law. You must:

- Read, understand, and comply with the Code and Revelyst's 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 and that you are not aware of any violations thereof

### **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 your obligation and the right thing to do.

1. Bring any violation (or suspected or anticipated violation) 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, finance, bribery or anti-corruption, or antitrust/competition, and other topics covered in this Code (except those included in item 3 below) may also be made directly to any of the following:
  - a. Your Human Resources Department
  - b. Revelyst Legal Counsel
  - c. Revelyst's Ethics Office
  - d. In addition, reports may be made through Revelyst's Ethics Helpline, which is managed by an outside service provider. Revelyst's Ethics Helpline is available all day every day online at [●] and through dedicated phone numbers that are set out at the end of this Code
3. Reports, concerns and questions relating to accounting, internal controls or auditing matters should be reported to the Chair of the Audit Committee.

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 Revelyst 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.

### **Revelyst's 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 Revelyst. 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 Revelyst 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**

Revelyst 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 as appropriate. 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 Revelyst, 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. The nature of such disciplinary action will be determined based on all the facts and circumstances.

### **Waiving the Standards**

This Code has been approved and adopted by the Board, and any amendment or waiver of this Code must be in writing and must be authorized by the Board or Audit Committee. Any such amendment or waiver that applies to one of Revelyst's directors or executive officers will be promptly disclosed as required by applicable laws or regulations.



## **Complying with Laws, Regulations and Revelyst's 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 Revelyst, 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
- Make any agreement with a competitor not to solicit a competitor's employees or regarding employee compensation

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 Revelyst. You should consult with Revelyst Legal Counsel if you have any questions.

### **Gifts, Hospitality and Entertainment**

Revelyst 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 the gift:

- 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 Revelyst
- 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 or a public official's friend or family
- Anything of value that could create the appearance of impropriety or result in embarrassment to you or Revelyst

### **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 Revelyst's reputation through our behavior and performance. We also need to make sure that any legal obligations relating to Revelyst's communications are met. Because of this, Revelyst has authorized certain individuals – and only those individuals – to speak on behalf of Revelyst. All media inquiries must be referred to Revelyst 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 Revelyst Corporate Communications. All contacts with stockholders, prospective investors, investment advisers, broker-dealers, securities analysts and other members of the investment community, or requests for information related to Revelyst's financial performance, must be referred to Revelyst Investor Relations.

## **Appropriate Political Activity and Lobbying**

Revelyst participates in the political and legislative process to ensure that Revelyst's interests are appropriately represented. Revelyst 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 Revelyst, you must first obtain the approval of Revelyst 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 must be engaged in on their own time and with their own resources.

## **No Bribery or Corruption**

At Revelyst, 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 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. Revelyst has a clear policy prohibiting such "facilitating payments" without the review and express written approval of Revelyst Legal Counsel, no matter how common or ordinary the payment may appear. You should always consult Revelyst Legal Counsel if you have questions or concerns.

Because a third party acting on behalf of Revelyst can expose Revelyst to liability under the FCPA, the UK Bribery Act 2010, and other anti-bribery laws, great care must be taken in retaining representatives and other third parties. You must comply with Revelyst'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 Revelyst policy and the law. Bribery and kickbacks are very serious crimes and it is important that Revelyst does not allow even the appearance of impropriety. You should consult with Revelyst 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 Revelyst
- Charitable donations may not benefit public officials
- Transactions should be transparent
- Travel and lodging for officials must be appropriate and pre-approved by Revelyst Legal Counsel
- Gifts and hospitality for officials should be infrequent, reasonable, and pre-approved by Revelyst Legal Counsel
- Hiring decisions may not benefit public officials
- Facilitating payments are prohibited, unless pre-approved by Revelyst Legal Counsel
- Keep accurate books and records
- Immediately report actual or suspected violations to Revelyst Legal Counsel
- Retaliation for refusing to take or offer a bribe or kickback or for reporting concerns is not tolerated

No Revelyst employee or Revelyst 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 Revelyst.

### **Compliance with Export and Import Controls**

Revelyst complies with international trade laws and regulations of the United States and all other countries where Revelyst 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 Revelyst'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 Revelyst 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 Revelyst by working together respectfully and inclusively. We each play a role in creating and maintaining this type of environment. In our relationships 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. Revelyst 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 Revelyst, 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. Examples include disrespectful comments based on age, race, gender, or ethnic characteristics and unwelcome sexual advances or comments. Revelyst strictly prohibits any acts of harassment, whether done by an employee or a non-employee, and our policy applies to applicants and employees in all phases of employment, including recruiting, hiring, placement, training and development, transfer, promotion, demotion, performance reviews, compensation and benefits, and separation from employment.

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 Revelyst-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 Revelyst network to which you have not been granted authority is strictly prohibited.

Always remember that your communications should be professional and work-related, and 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**

Revelyst 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**

Revelyst does not permit bullying, intimidation, threats or physical violence in the workplace. Revelyst 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 Revelyst's property may be immediately removed from the workplace.

## **Using Our Resources and Assets Responsibly**

### **Conflicts of Interest**

When conducting business on behalf of Revelyst, you must be careful to avoid situations that could create a conflict of interest, or even the appearance of one. As described more fully below, a “conflict of interest” occurs when an employee’s private interests, or the interests of an employee’s family member, interferes – or even appears to interfere – in any way with the interests of Revelyst. 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, your family member or a friend holds a substantial financial interest in an actual or potential supplier, client, or competitor of Revelyst.

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

### **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 Revelyst. 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 Revelyst Legal Counsel. Work with your supervisor to remove yourself from the conflicting situation.



**Related Person Transactions**

You must disclose and only enter into “related person transactions” in accordance with Revelyst’s Related Person Transactions Policy, which applies to all officers and directors of Revelyst and certain other persons. For more information, please contact Revelyst Legal Counsel.

**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 Revelyst. Generally speaking, working for or providing services to any Revelyst 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 Revelyst. Putting Revelyst first means giving your work at Revelyst your full attention.

**Business Opportunities**

If you become aware of a business opportunity that may be of interest to Revelyst, 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 Revelyst, or Revelyst’s customer information or property, in competition with Revelyst, either directly or indirectly.

**Company Assets**

Each of us has the responsibility to protect Revelyst’s assets and ensure their efficient use and prevent theft, carelessness, and waste. All of Revelyst’s assets should only be used for legitimate business purposes.

## **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. Revelyst has established record retention requirements and policies that comply with our legal obligations and business requirements.

### **Proprietary Information**

During your employment with Revelyst, you will have access to proprietary information and trade secrets of Revelyst and our partners, vendors, customers, suppliers and other third parties. Such information is part of Revelyst'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 Revelyst
- 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 Revelyst's legitimate business purposes and is not disclosed to others without authorization. This duty exists not only while you are an Revelyst employee, but even after you leave Revelyst.

### **Access, Use and Protection of Proprietary Information**

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

- Do not use Revelyst's proprietary information for your own personal benefit or to benefit someone else
- Do not share Revelyst's proprietary information with friends, family members, or anyone either inside or outside of Revelyst 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 Revelyst common areas like lobbies, hallways, or break rooms
- Discuss proprietary information with other Revelyst 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 Revelyst 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 Revelyst
- 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 Revelyst's records are accurate, timely and complete. Proper authorization must be obtained before incurring, paying or transferring Revelyst's funds and assets. Forecasts and assessments provided to management must be done in a timely manner.

If you see an error or omission in an Revelyst document, report it immediately to your supervisor, Revelyst's Internal Audit Department, or Revelyst'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 Revelyst's operations and financial condition.

Truth and accuracy in reporting is required. Revelyst 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 Revelyst'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 Revelyst. You should consult with Revelyst Legal Counsel if you have any questions.

### **Insider Trading and Tipping**

If you are aware of material nonpublic information (“inside information”) relating to Revelyst, you may not buy, sell or trade Revelyst stock or other securities. In addition, you may not trade in securities of another company (for example, Revelyst's customers, suppliers, vendors, subcontractors and business partners) if you have material nonpublic information about that company that you obtained at Revelyst. It is also unlawful for you to “tip” others – i.e., 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 securities of a company. Material information includes, among other things:

- Earnings results or estimates, or other important financial information
- A proposal, negotiation 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

For more information regarding insider trading, including applicable rules and procedures, you should review Revelyst's Insider Trading Policy, which applies to all employees, officers and directors of Revelyst. If you have any questions about your securities trading, please check with Revelyst 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 Revelyst, 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 Revelyst's 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 must protect proprietary and other controlled information and use good judgment.

Here are some basic rules to follow:

- If you reveal yourself as an Revelyst employee, do make it clear that the views expressed are yours alone and not the views of Revelyst
- Do not post or discuss proprietary information, trade secrets, classified data or information subject to export control requirements
- Do not disclose nonpublic information regarding Revelyst's financial performance or that might affect the price of Revelyst 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 Revelyst or its employees, customers, partners or affiliates
- If you comment on any of Revelyst's products or services, do ensure your comments reflect your honest beliefs, identify yourself as an Revelyst employee, and state that the views expressed are yours alone and do not necessarily reflect the views of Revelyst.

## **Responsible Business Leadership, Citizenship and Community Engagement**

### **Community Engagement**

Community service is a large part of Revelyst'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 Revelyst with the highest quality products delivered on time and at the best value. Revelyst partners with suppliers who demonstrate proven capabilities and adherence to quality, cost and schedule commitments. It is Revelyst's policy to actively pursue opportunities to assist small businesses and diversity-focused companies in becoming qualified and valued Revelyst suppliers.

We expect our suppliers to follow all applicable laws and Revelyst 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. Revelyst 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 Revelyst's operations on the environment and to proactively incorporate environmental initiatives into Revelyst'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 aim to follow all 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 that a potentially toxic or unlawful release into the environment has occurred or may occur, you must notify both your supervisor and the facility

environmental department immediately so the appropriate spill response activities can be initiated.

### **Revelyst's Ethics Helpline**

**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 [revelyst.ethicspoint.com](https://revelyst.ethicspoint.com).**

Country	Type	Provider/Carrier	Access Code	Phone Number
United States	Domestic	Direct Dial		1-833-935-3286
Canada	Domestic	Direct Dial		1-833-935-3286
Puerto Rico	Domestic	Direct Dial		1-833-935-3286
France	ITFS	OneConnect		0800 90 40 95
Hong Kong	ITFS	OneConnect		800902152
Mexico	ITFS	OneConnect		8008801726
United Kingdom	ITFS	OneConnect		0800 066 8926
China ( <i>Southern</i> )	WWC	Direct Access	10-811	833-935-3286
China ( <i>Northern</i> )	WWC	Direct Access	108-888	833-935-3286
Germany	WWC	Direct Access	0-800-225-5288	833-935-3286
Ireland ( <i>UIFN</i> )	WWC	Direct Access	00-800-222-55288	833-935-3286
Ireland	WWC	Direct Access	1-800-550-000	833-935-3286
Philippines ( <i>PLDT – Tagalog Operator</i> )	WWC	Direct Access	1010-5511-00	833-935-3286
Philippines (Globe, Philcom, Digitel, Smart)	WWC	Direct Access	105-11	833-935-3286
Spain	WWC	Direct Access	900-99-0011	833-935-3286
Sweden		Direct Access	020-799-111	833-935-3286