

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549**

FORM SD
Specialized Disclosure Report

STURM, RUGER & COMPANY, INC.
(Exact Name of Registrant as Specified in its Charter)

DELAWARE
(State or Other Jurisdiction of
Incorporation)

001-10435
(Commission File Number)

06-0633559
(IRS Employer Identification
Number)

ONE LACEY PLACE, SOUTHPORT, CONNECTICUT
(Address of Principal Executive Offices)

06890
(Zip Code)

Kevin B. Reid, Sr. **(203) 259-7843**
(Name and telephone number, including area code, of the person to contact in connection with this report)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2022.

Section 1 – Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

A copy of Sturm, Ruger & Company, Inc.’s Conflict Minerals Report for the January 1 to December 31, 2022 reporting period is filed as Exhibit 1.01 hereto and is publicly available at www.ruger.com/corporate.

Item 1.02 Exhibit

The Company’s Conflict Minerals Report for the January 1 to December 31, 2022 reporting period is filed as Exhibit 1.01 to this Form.

Section 2 – Resource Extraction Issuer Disclosure

Item 2.01 Resource Extraction Issuer Disclosure and Report

N/A

Section 3 – Exhibits

Item 3.01 Exhibits

The following exhibit is filed as part of this report:

Exhibit 1.01 – Conflict Minerals Report as required by Items 1.01 and 1.02 on this Form.

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

STURM, RUGER & COMPANY, INC.

By: /S/ THOMAS A. DINEEN
Name: Thomas A. Dineen
Title: Principal Financial Officer,
Principal Accounting Officer,
Sr. Vice President, Treasurer and
Chief Financial Officer

Dated: May 31, 2023

Conflict Minerals Report of Sturm, Ruger & Company, Inc.

This is the Conflict Minerals Report of Sturm, Ruger & Company, Inc. (“Ruger”) for the 2022 calendar year (“Reporting Period”) in accordance with Rule 13p-1 (“Rule 13p-1”) under the Securities Exchange Act of 1934. Rule 13p-1 and Form SD require the disclosure of certain information if a company manufactures or contracts to manufacture products in which certain “Conflict Minerals” (as defined below) may be present and necessary to the functionality or production of such products. “Conflict Minerals” are defined as cassiterite, wolframite, columbite-tantalite, gold, and their derivatives, which are tin, tungsten, and tantalum (“3TG”) mined in the Democratic Republic of the Congo and in the adjoining countries (“Covered Countries”). This report has been prepared by management of Ruger, and includes the activities of all divisions, which we are required to consolidate.

Ruger is one of the nation’s leading manufacturers of rugged, reliable firearms for the commercial sporting market. As a full-line manufacturer of American-made firearms, Ruger offers consumers almost 800 variations of more than 40 product lines. For more than 70 years, Ruger has been a model of corporate and community responsibility. Our motto, “Arms Makers for Responsible Citizens,” echoes the importance of these principles as we work hard to deliver quality and innovative firearms. Ruger has been in business since 1949 and was incorporated in its present form under the laws of the State of Delaware in 1969. Ruger’s principal executive office is located in Southport, CT, and its principal manufacturing facilities are located in Mayodan, NC, Newport, NH, and Prescott, AZ.

The process outlined in this Conflict Minerals Report describes Ruger’s efforts to comply with the mandates of Rule 13p-1.

RCOI/Due Diligence Process

Ruger’s good-faith Reasonable Country of Origin Inquiry (“RCOI”) relating to 3TG contained within its products is part of a continuous effort and involves continual dialogue between the Company and its suppliers. The RCOI was designed to determine whether any 3TG used in Ruger products originates in the Covered Countries and/or comes from recycled or scrap sources.

Because Ruger does not directly source any 3TG and is many levels removed from the mining, smelting, and refining processes, we have very limited influence over these far-removed suppliers. As a result, Ruger relies upon its direct suppliers to obtain information regarding the origin of any 3TG that is contained within Ruger’s products, including where possible, the smelters of the 3TG. Similarly, many of Ruger’s suppliers depend on their suppliers for this information. Ruger’s report is limited by the information

regarding the source of 3TG provided by its suppliers, and is dependent upon the willingness of its suppliers to cooperate and assist in this process. Ruger does not purchase raw ore or unrefined 3TG, makes no purchases in the Covered Countries, and sources materials and parts almost exclusively within the United States.

Ruger has worked to identify suppliers that potentially provide materials and components that contain 3TG. This list was further refined in 2022, and we continue to update both our supplier list and our RCOI due diligence process on an annual basis, as we have for the last several years. In 2022, Ruger reached out to each identified supplier and: (i) described the reporting obligations imposed by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act; and (ii) requested information regarding the presence and sourcing of 3TG used in the materials and components supplied to the Company during the Reporting Period. In instances where suppliers reported no 3TG present in the materials and components supplied, no further action was taken with that particular supplier, but our product composition documentation was updated to reflect this information. In instances where suppliers reported the presence of 3TG in materials and components supplied to Ruger, additional information, including whether such 3TG is intentionally added to the material and/or obtained from scrap or recycled sources, and where applicable, the identity of the smelter(s), was requested.

Ruger engaged further with suppliers, as needed, to ensure that the request was understood and complied with. Ruger then compared the smelters and refiners identified in the supply chain survey against the list of smelter facilities which have been identified as Conflict Free by programs such as the EICC/GeSI Conflict Free Smelter program for 3TG. To the extent that additional information was required, Ruger followed up with various suppliers and sought additional detail.

Conflict Minerals Disclosure

After conducting a good faith inquiry that involved substantial supplier engagement, we have determined that only a small portion of Ruger's sourced material contains 3TG. Of those suppliers that provide products containing 3TG, the vast majority have reported that the 3TG is either not intentionally added to the material or comes from scrap or recycled sources. Of the remaining population of suppliers, most have completed their due diligence and reported that materials supplied to Ruger do not contain 3TG sourced in the Covered Countries. A small percentage of suppliers either did not respond to our outreach efforts or have been unable to obtain 100% compliance from their supply chain, and therefore cannot definitively identify the source of 3TG contained in the materials provided to the Company. However, the information provided does not appear to indicate that any of the materials these vendors supply to Ruger is derived from 3TG which originates in the Covered Countries.

Based upon the information received from its supply chain, Ruger has no reason to believe that any of the materials contained within its products contains 3TG which originates in Covered Countries. Ruger makes this determination based upon information provided by its suppliers, which has been evaluated and subjected to the above-described due diligence process.

This Report has not been subject to an independent private sector audit.

The Company may, from time to time, make forward-looking statements and projections concerning future expectations. Such statements are based on current expectations and are subject to certain qualifying risks and uncertainties. Readers are cautioned not to place undue reliance on these forward-looking statements, which speak only as of the date made. The Company undertakes no obligation to publish revised forward-looking statements to reflect events or circumstances after the date such forward-looking statements are made or to reflect the occurrence of subsequent unanticipated events.