



POLITICAL CONTRIBUTIONS POLICY

This Political Contributions Policy (the “**Policy**”) governs corporate Political Contributions (defined below) by Sturm, Ruger & Company, Inc. (together with its subsidiaries, the “**Company**”).

As used herein, “**Political Contributions**” means monetary and non-monetary expenditures that the Company cannot deduct as an “ordinary and necessary” business expense under section 162(e) of the Internal Revenue Code (the “**Code**”) because they are incurred in connection with (i) influencing legislation, (ii) participating or intervening in any political campaign on behalf of (or in opposition to) any candidate for public office, and (iii) attempting to influence the general public, or segments thereof, with respect to elections, legislative matters, or referenda.

Philosophy

Public policy issues have the potential to have an impact on the Company’s business, its employees, business partners, shareholders, and the communities in which the Company operates. The Company’s management believes that in certain cases it may be appropriate and in the Company’s best interests to use its resources to make Political Contributions to political parties, candidates for public office, political organizations, and contribute or pay membership fees to trade and industry associations and coalitions that are engaged in political activity. The Company’s Board of Directors has adopted this Policy to ensure that Political Contributions are made in a manner consistent with the Company’s core values, to protect or enhance shareholder value, without regard to the private political preferences of company officers.

Political Contribution Approval

Any Political Contribution in excess of \$10,000 made by the Company must be approved in advance by the General Counsel of the Company and must be made in line with the long-term business objectives of the Company.

All Political Contributions must comply with this Policy, the Foreign Corrupt Practices Act, and all other applicable laws and regulations in the jurisdictions in which the contributions are made.

Board Oversight

Management will report annually to the Nominating and Corporate Governance Committee of the Board of Directors of the Company regarding the Company's compliance with this Policy, and provide a review of the overall strategic priorities for Political Contributions, including the objectives that align with the long-term business objectives of the Company.

Any Political Contributions by the Company made in the United States that will aggregate to more than US \$10,000 in a calendar year will be reported to, and reviewed by, the Nominating and Corporate Governance Committee.

The Nominating and Corporate Governance Committee may adjust the review, approval and disclosure thresholds in this policy from time to time.

Disclosure and Reports

This Policy will be published on the Company's website. The Company shall at all times comply with all current applicable laws and regulations relating to the reporting requirements of corporate Political Contributions.

In addition, on an annual basis, in the event that Political Contributions made in the United States aggregate to more than US \$50,000 in a calendar year, the Company will publish on its website at <http://www.ruger.com/corporate/index.html> a summary report of such Political Contributions. The summary report, if any shall be so required, shall include:

- contributions to, or expenditures in support of, or opposition to, political candidates, political parties, political committees;
- dues, contributions or other payments made to tax-exempt "social welfare" organizations and "political committees" operating under sections 501(c)(4) and 527 of the Code, respectively, and to tax-exempt entities that write model legislation and operate under section 501(c)(3) of the Code; and
- the portion of dues or other payments made to a tax-exempt entity such as a trade association that are used for an expenditure or contribution and that would not be deductible under section 162(e) of the Code if made directly by the Company.

Amendments to the Policy

Amendments to the Policy must be approved by the Board of Directors.

February 11, 2014