

KAMAN CORPORATION

Anti-Bribery Compliance Policy

OUR POLICY:

Kaman's policy is to comply with all applicable anti-bribery laws, including but not limited to the United States' Foreign Corrupt Practices Act (hereinafter, "**FCPA**"), the United Kingdom's Bribery Act 2010 (hereinafter, the "**U.K. Bribery Act**"), and all applicable local laws where Kaman operates, and to accurately reflect all transactions on Kaman's books and records. It is also Kaman's policy to require those agents, consultants and business partners who work on Kaman's behalf to comply with these same laws and practices.

PROGRAM OVERVIEW:

Certain activities related to foreign government elected officials, appointees, employees, and other representatives – such as providing gifts, political contributions, entertainment, travel-related benefits or facilitating payments - can violate anti-bribery laws around the world. In addition, bribery of non-governmental officials is illegal in many countries and also violates Kaman's Code of Business Conduct and Ethics ("**Code of Conduct**"). Kaman may also be liable under some circumstances for bribes or attempted bribes made or offered by third-party business partners who may be acting on Kaman's behalf.

The provisions of this Anti-Bribery Compliance Program are applicable to all regions and business units of Kaman and to all employees and representatives acting for or on behalf of Kaman wherever they may be located. Strict adherence to the policies articulated herein is required.

What it means

Kaman requires that its employees and business partners acting on Kaman's behalf:

- not engage in acts or omissions that offer, authorize or give anyone a bribe, or create the impression that a bribe has been offered, authorized or given;
- take affirmative steps to prevent those doing business directly or indirectly with a Government official, or in any commercial context, on Kaman's behalf from engaging in bribery;
- always follow and use Kaman's mandatory due diligence process for business partners, internal approval, financial reporting, and document retention requirements;
- carefully scrutinize activities of acquisition targets and joint venture partners and perform comprehensive due diligence to identify and address potential bribery issues;
- comply with all record keeping requirements and financial controls to enable Kaman to demonstrate its compliance with all applicable anti-bribery laws; and
- promptly report to the Division Anti-Bribery Compliance Official any suspected violations of this policy by Kaman employees or others doing business on Kaman's behalf.

What to avoid

Kaman Persons shall avoid the following:

- directly or indirectly providing cash or anything of value to a government official or commercial business contact to obtain an unfair business advantage or to obtain or retain business;
- accepting cash or anything of value from another person or entity seeking to do business with Kaman;
- authorizing or providing travel benefits, gifts, entertainment, or political or charitable contributions for the benefit of a government official or commercial business partner without the required due diligence assessment and/or internal Kaman business unit or Legal Department approvals.
- entering into a consultant or sales agent agreement that will result in contacts with government officials without conducting due diligence, obtaining the required internal business and legal approvals, retaining all due diligence documentation in accordance with the Kaman Anti-Bribery Compliance Program Manual and/or the Kaman Records Retention Policy, and accurately recording on Kaman's books and records all related payments.
- making or authorizing "grease" or facilitating payments, except as set forth in this Manual.
- making any incomplete, false or inaccurate entries on Kaman's books and records.

No policy statement or procedure can address all possible situations or transactions explicitly. Where any situation or transaction arises that is not addressed in this Policy or the Anti-Bribery Compliance Program Manual, or in any case of a suspected violation of this Policy or legal requirements, the employee should contact their respective Division Anti-Bribery Compliance Official to determine appropriate steps to resolve the matter.