



## **CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE**

This document is intended to comply with the California Transparency in Supply Chains Act which requires certain corporations to disclose its activities regarding monitoring its supply chains to prevent human trafficking and slavery.

Kaman has in place rules against using forced labor, including illegal child labor, slave labor and abusive punishment of workers. Kaman's Code of Business Conduct and Ethics (the "Code") states in part:

"We strive to comply with the employment laws of each country in which the Company operates or conducts business. The use of forced, child, or slave labor is not allowed, nor is the abuse or physical punishment of any person providing services to or on behalf of the Company. The compensation paid to workers and working conditions must meet or exceed the legal requirements for each applicable jurisdiction. We expect all employees, contractors and suppliers to abide by these principles."

In accordance with Kaman's policy, all active employees receive annual training and must recertify their commitment to follow the Code each year. Additionally, Code training and certification is required for all newly hired or rehired employees, consultants, temporary workers, and apprentices within 14 days of commencement of work

Kaman also implemented the Kaman Combatting Trafficking In Persons Policy, which is posted on the Kaman Corporation internet web site under "Governance". Such Policy states, in pertinent part:

"In support of the United States Government policy prohibiting trafficking in persons ... we expect our employees and suppliers to not engage in the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, to not procure commercial sex acts, or engage in trafficking of persons."

Kaman makes human trafficking awareness training available to company management and personnel. Training is specifically emphasized for employees with supply chain management responsibility so they are trained to recognize and mitigate such risks within the supply chain.

The standard terms of purchase for Kaman and its subsidiaries were modified to require that new supplier and subcontractor agreements contain provisions prohibiting the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, procuring commercial sex acts, or trafficking of persons. Any material violation of law relating to basic working conditions and human rights, including laws regarding slavery and human trafficking, may be considered a material breach and grounds for contract termination for default.

Although suppliers are not required to certify that materials incorporated into the products sold to Kaman comply with laws regarding slavery and human trafficking of the country(ies) in which they do business, Kaman requires and relies upon the commitments of our suppliers (including contractual commitments) to comply with all United States and international laws and regulations regarding human trafficking. At the present time, Kaman does not directly, or through the use of third parties, evaluate or audit product supply chains on the subject of human trafficking and slavery, other than as stated herein.

The Chief Ethics and Compliance Officer issued a memorandum to all Kaman employees reiterating that individuals may report, without fear of retaliation, any suspected human rights violations. Compliance posters were distributed to all Kaman operating locations to provide employees with contact information for reporting such concerns.