

CODE OF BUSINESS CONDUCT AND ETHICS





A Message from Our Chief Executive Officer

Kaman is a company built on innovation – generations of Employees who never stop seeking a better way. Whether we’re helping our customers be more efficient or pioneering safer ways to fly, we are always at work, exceeding expectations in a spirit of integrity.

Each of us, as Kaman Employees, carries on that spirit. We are Kaman – the keepers of our Company’s heritage. The work we do and, more importantly, the way we do it, will determine our future success.

Our Code of Business Conduct and Ethics is a critical resource in that respect, because it helps us conduct business ethically and in line with our vision, our core values, our policies and the laws that apply to our Company.

The Code is your guide, so refer to it often. Rely on it when work gets complicated – or when you’re just unsure how to handle certain interactions or situations. Look to the Code for help in navigating those situations and also for sharing concerns about conduct that goes against who we are and what we believe.

Thank you for your ongoing commitment to Kaman and our Code. Through your own ethical actions, you let your coworkers and our customers know that Kaman Employees can always be counted on to live our values and innovate with integrity.

Ian K. Walsh
Chairman, President and CEO
Kaman Corporation

OUR VISION:

**Propelling Our Customers Forward
by Imagining and Delivering
Highly-Engineered Solutions.**

Our Core Values

As we continue to grow as a global company, it has become ever more important to explicitly define the core values that guide our behavior and shape our culture.

R		RESPECT – We value each other as people and appreciate the skills and perspectives we each bring to the team. We speak and act courteously at all times.
E		EXCELLENCE – We always do our best, giving our full attention to the quality of every job, every outcome and every relationship. We provide the highest level of service to our customers – both external and internal.
A		ACCOUNTABILITY – We each accept the responsibility for our actions and for working to achieve desired results.
C		CREATIVITY – We take on every challenge with a spirit of discovery and ingenuity. Always offering our best ideas and resources.
H		HONOR – We keep our word. We behave with integrity. We do the right thing regardless of how hard it may be or who knows.





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Honoring Our Code

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Purpose and Overview

We value excellence and integrity.

The Kaman Code of Business Conduct and Ethics (the “Code”) is a statement of the principles and standards that Kaman Corporation and its subsidiaries expect all employees, officers and directors, (the “Employees”) to follow in conducting business activities whenever and wherever that may be.

The Code:

- ◇ Helps us put our values into practice on the job every day
- ◇ Guides us in making ethical business decisions
- ◇ Is not a comprehensive rulebook, but instead should be used as a resource to determine what is appropriate (and what isn’t)
- ◇ Directs you to people and policies for help when you are not sure about the right course of action

We are all expected to understand, respect and comply with all of these requirements. In cases where the law may require less than our Company standards, we follow our own standards.

If you are faced with a situation where you do not understand what is required or have questions about legal requirements or how to apply them, seek guidance from the Legal and Compliance Department.

We rely on you to use good judgment at all times and to seek help when you need it. Failing to comply with the Code or applicable laws and regulations can have severe consequences for both the individuals involved and the Company, including disciplinary action, civil penalties or criminal prosecution under certain circumstances.

Complying with Laws and Regulations

Maintain the reputation we have earned as a company that conducts business lawfully.

We are subject to many laws and regulations imposed by the countries, states and local jurisdictions where we operate. As a company that contracts with the U.S. government, we also are subject to certain complex and far-reaching laws associated with that work.

Consider This

I’m involved in a project where a local law seems to conflict with what’s required by our Code. What should I do?

We operate in multiple countries, so it’s important to be aware of different laws and customs that may apply. While we respect the norms of our customers, business partners and coworkers throughout the world, all Employees must, at a minimum, comply with the standards and principles in this Code. If any provision of our Code conflicts with a local law or requirement, seek guidance from the Legal and Compliance Department before proceeding.



Our Responsibilities

Integrity is a shared commitment.

Each of us must take responsibility for acting with integrity, even when this means making difficult choices. Meeting our responsibilities is what enables us to succeed and grow.

Employees

Regardless of your role or job responsibility, every Employee at Kaman is expected to:

- ◇ Act in a professional, honest and ethical manner when conducting business on behalf of our Company
- ◇ Know the information in the Code and Kaman policies, paying particular attention to the topics that apply to your specific job responsibilities
- ◇ Complete all required training in a timely manner and keep up to date on current standards and expectations
- ◇ Promptly report concerns about possible violations of our Code, our policies or the law to your manager, Compliance Advocate, the Legal and Compliance Department or the [Ethics Hotline](#)

DURING YOUR EMPLOYMENT

AT KAMAN, you may be asked to participate in internal and external investigations and audits that are conducted by our Company. Employees are expected to fully cooperate with all such requests and ensure that any information provided is true, accurate and complete.

You may also receive inquiries or requests from government officials. If you learn of a potential government investigation or inquiry, you must immediately notify the Legal and Compliance Department before taking or promising any action. If you are directed by our Company to respond to a government official's request, extend the same level of cooperation and again, ensure that the information you provide is true, accurate and complete.

Never alter or destroy records in response to an investigation or when an investigation is anticipated, and never attempt to improperly influence, coerce, manipulate, or mislead anyone involved in the conduct of an audit or investigation.



Supervisors and Managers

If you are a supervisor or manager, you have an obligation to:

- ◇ Set a personal example of ethical behavior and integrity and expect no less from the Employees you supervise or manage
- ◇ Take reasonable steps to ensure that the Employees under your supervision or management are aware of and comply with the Code and complete annual Code of Conduct training
- ◇ Monitor compliance with the Code and maintain an environment of open communication where Employees are encouraged to raise issues and concerns without fear of retribution
- ◇ Answer questions and provide prompt and responsive guidance about ethical issues to the individuals under your supervision
- ◇ Act promptly to address and report illegal or unethical incidents to the Legal and Compliance Department or the [Ethics Hotline](#)
- ◇ [Never retaliate or tolerate retaliation](#) against anyone who reports a concern in good faith
- ◇ Know the limits of your authority and seek appropriate guidance when you need assistance



Remember ...

No reason, including the desire to meet business goals, should ever be an excuse for violating our Code, our policies or the law.

Consider This

I observed misconduct in an area not under my supervision. Am I still required to report the issue?

You are chiefly responsible for individuals under your supervision, but all Kaman Employees are required to report misconduct. As a leader, you are responsible to be proactive. The best approach would be to talk first with the manager who oversees the area where the problem is occurring, but if this isn't feasible or effective, you should seek guidance from your Human Resources representative, Compliance Advocate or the Legal and Compliance Department.



Compliance Advocates

Designated Employees throughout the Company have been appointed as Compliance Advocates. These individuals are responsible for:

- ◇ Promoting the Code to the Employees
- ◇ Ensuring Employees are made aware of the availability of the [Ethics Hotline](#)
- ◇ Being readily available and accessible to discuss compliance-related concerns raised by Employees
- ◇ Investigating alleged violations of the Code or company policy, as directed, and implementing remedial actions when a violation has been confirmed
- ◇ Reporting alleged violations of the Code or company policy to the Legal and Compliance Department

The existence of Compliance Advocates does not relieve every manager’s responsibility to take reasonable steps to assure that Employees are aware of and comply with the Code.

DO YOU KNOW YOUR COMPLIANCE ADVOCATE?

A list of our Company Compliance Advocates is available from our [website](#) or the Legal and Compliance Department.

Guidelines for Ethical Decision-Making

Think before you act.

Making the right decision is not always easy. There may be times when you will be under pressure or unsure of what to do. Always remember that when you have a tough choice to make, you’re not alone. There are resources available to help you. If you are facing a difficult decision, it may help to ask yourself:



If you answer “no” or “I’m not sure” to any of these questions, stop and check with the Legal and Compliance Department before proceeding. Remember, in any situation, under any circumstances, it is always appropriate to ask for guidance.



Asking Questions, Reporting Concerns

Do the right thing.

If you see or suspect a violation of our Code, our policies or the law, talk to your manager. If you are uncomfortable speaking with your manager, there are resources available to help you:

- ◇ Contact the Legal and Compliance Department
- ◇ Contact another member of management or your Human Resources representative
- ◇ Contact your Compliance Advocate
- ◇ In certain countries and depending on the suspected violation and to the extent available, you may also contact the local Data Protection Officer or a member of the Works Council
- ◇ Contact the [Ethics Hotline](#)

If you prefer to speak to a representative in a language other than English, an interpreter can be made available. Depending on the place of your jurisdiction, you may either report verbally, in writing, or both. You may also request a physical meeting.

WHAT TO EXPECT WHEN YOU USE THE ETHICS HOTLINE

The [Ethics Hotline](#) web portal and phone lines (with dialing instructions) are available 24 hours, seven days a week. Details of the Ethics Hotline program are also posted at each facility. Trained specialists from an independent third-party provider of corporate compliance services will answer your call, document your concerns and forward a written report to Kaman for further investigation.

MAY I MAKE A REPORT ANONYMOUSLY?

Absolutely. However, it may make investigating your concerns more difficult if we are unable to contact you for additional information that may be needed during the investigation. Providing your name and contact information also allows us to keep you informed about the status of the investigation.

Any report you make will be kept as confidential as possible by the individuals involved with reviewing and, if necessary, investigating the report. This means that the identity of the person reporting and any third persons mentioned therein will be protected from access by unauthorized individuals. Kaman will involve others in the investigation on a need-to-know basis only.

Kaman will make every reasonable attempt to ensure that your concerns are addressed appropriately. In turn, we expect that you will use all reporting channels in a responsible manner by submitting truthful and accurate information in good faith.



Our Commitment to Non-Retaliation

Share your concerns without fear of retaliation.

It is Kaman policy and practice to maintain the highest ethical standards, and to create a workplace free of inappropriate or unlawful behavior, in which people are encouraged to share their concerns with the Company without fear of retaliation. Consequently, no adverse action will be taken against any Employee for speaking up, reporting, participating or assisting in the investigation of a suspected violation of the Code, Company policy, or applicable law, unless the allegation made or information provided is found to be intentionally false or not made or provided in good faith.



Accountability

Be aware of the consequences.

Violating our Code, our policies, or the law, or encouraging others to do so, exposes Kaman to liability and puts our reputation at risk. If an ethics or compliance problem does occur, we expect you to report it promptly and completely so that an effective solution can be developed. Those determined responsible are subject to disciplinary action such as:

- ◇ A warning or reprimand
- ◇ Probation
- ◇ Suspension
- ◇ Discharge
- ◇ Required payment for loss or damages

You should also understand that violations of laws or regulations may result in legal proceedings and penalties including, in some circumstances, criminal prosecution.

Waivers and Changes to Our Code

Always obtain approval.

Our Company does not expect to grant waivers or exceptions to the Code except under very limited circumstances where it is determined that doing so is in the Company's best interests and the matter does not involve any violations of applicable law or the Company's ethical standards.

The Code is not intended to be and is not an employment contract, and no special rights or privileges are granted to individuals other than those required by applicable law. The Code is not a contract, and the Company reserves the right to change, modify, suspend, interpret or eliminate any provisions of the Code at any time, for any reason and without prior notice.





Promoting a Safe and Respectful Workplace

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Embracing Diversity and Inclusion

Our Employees are our most valuable asset.

Kaman is committed to a workplace in which our Employees treat others with respect and dignity. Diversity of backgrounds, cultures, abilities and perspectives strengthens us as an organization and fosters Employee engagement, creativity and a positive work environment.

We are also committed to ensuring that our Employees feel welcomed and valued and are given opportunities to grow, contribute and develop with us. To uphold that commitment, we support laws prohibiting discrimination and provide equal opportunity in all our departments, programs and worksites.

We base employment decisions on qualifications, demonstrated skills and achievement and never on any characteristic protected by law or Company policy including: age, gender, race, color, national origin, ethnicity, sex (including pregnancy, sexual orientation or gender identity), genetic information, physical or mental disability, religion or veteran status.

✓ Do the Right Thing

- » Treat others respectfully and professionally
- » Promote equal opportunity and diversity
- » Do not discriminate against others on the basis of any characteristic protected by law or Kaman policy

Consider This

I've received a couple of emails from a coworker with jokes and derogatory comments about certain nationalities. The jokes and comments were not directed at me; in fact, they were not directed at anyone in particular, but they made me very uncomfortable, and I'm not sure if the coworker is sending similar emails to others at Kaman. What should I do?

You should first discuss your concerns with your coworker and ask them to stop sending these kinds of emails. If they won't, or if you are uncomfortable talking to them directly, you can report your concerns to your manager or your Human Resources representative. Even if the jokes and comments were not directed at anyone, this type of content doesn't demonstrate respect for others. These emails also undermine our core values and can seriously erode the inclusive culture we have all worked hard to create.



WE DO NOT TOLERATE:

- » Behavior that is intended to coerce, intimidate or threaten another person, regardless of whether it is verbal, physical or written
- » Behavior that creates an intimidating, hostile or offensive work environment
- » Intentionally damaging someone else's property or acting aggressively in a manner that causes someone else to fear injury
- » Abusive conduct and bullying
- » Causing deliberate or willful harm to another
- » Unwelcome verbal or physical conduct of a sexual nature
- » Threatening remarks, obscene phone calls, stalking or any other form of harassment
- » The display of sexually explicit or offensive pictures or other materials
- » Using language or conduct that others may find derogatory, intimidating or offensive, such as taunting, racial or ethnic slurs or negative stereotyping

A Harassment-Free Kaman

Extend respect to everyone.

We support the right of Employees to work in an environment free from intimidation, harassment and abuse. Verbal or physical conduct by any Employee that harasses another, disrupts another's work performance, or creates an intimidating, offensive, abusive or hostile work environment will not be tolerated.

All of us, regardless of position, are responsible for ensuring that harassment is not condoned or overlooked. If you suspect a violation, you should promptly report it to your manager, Human Resources representative, the Legal and Compliance Department or the [Ethics Hotline](#).

Consider This

My coworker has invited me on several dates, each of which I have declined. Recently, I caught my coworker staring at me and overheard lewd comments my coworker said to someone else on the team that made me feel uncomfortable. I do not want to jeopardize my job by reporting the matter. What should I do?

Company policy requires the reporting of suspected harassment whether against you or another Employee, and you would not be jeopardizing your job by coming forward. Kaman does not tolerate retaliation against anyone who makes a good faith report of an incident of harassment. Contact your manager, Human Resources representative, the Legal and Compliance Department or the [Ethics Hotline](#) to report the conduct and discuss your concerns.

Safety and Security

Make a commitment to a safe workplace.

Kaman strives to provide a safe workplace for our Employees and visitors. This means operating our facilities according to health and safety laws and regulations and following Company policies. Refer to the [Kaman Safety Policy Guide](#) or local directives for further information.

Employees are expected to:

- ◇ Understand and follow the law and Company rules and participate in Company safety training
- ◇ Ask their manager or site Environmental Health and Safety (EH&S) representative about the safety and security requirements applicable to their work
- ◇ Proactively identify and correct hazards that could result in accidents or injuries
- ◇ Participate in and contribute to continuous improvement in order to maintain a safe work environment
- ◇ Eliminate or minimize the generation of, and exposure to, hazardous materials and waste
- ◇ Promptly and accurately report safety or security risks, injuries, incidents and accidents

Workplace Violence

Workplace violence, abuse, intimidation or offensive conduct in any form is prohibited, including:

- » Threatening physical violence
- » Fighting
- » Bringing a weapon to work
- » Intentionally damaging personal property

Substance and Alcohol Abuse

Employees who are impaired or under the influence of drugs, alcohol or substances at work can create an unsafe work environment.

The use, sale or possession of controlled substances (except for the proper use of medically prescribed legal substances) is prohibited in the workplace, while on Company property, and/or while on Company business elsewhere. Employees are subject to and must cooperate with any legal Company searches for alcohol, drugs or other controlled substances. Promptly report any person who appears to be impaired or working under the influence of alcohol, drugs or other substances.

Consider This

I work in a location where safety equipment is required, but it is uncomfortable. Several coworkers stopped wearing their equipment, and our work leader has not voiced objections. Can I stop wearing it, too?

Safety laws and Company rules are designed to protect Employees and must never be ignored. Wear all required safety equipment and remind your coworkers to do the same. If you feel uncomfortable addressing the matter with your coworkers or your manager, report your concerns to your Human Resources representative, Environmental Health and Safety Department or to the [Ethics Hotline](#).



Environmental Compliance

Be a good steward of our planet.

Kaman strives to conduct its business in compliance with applicable environmental protection laws and regulations. The complexity of environmental laws and their impact can be significant.

To assist Employees, Kaman has prepared the [Kaman Environmental Policy Guide](#) which, together with local directives, outlines the laws and their requirements. Refer to the Guide for detailed information about complying with environmental laws.

Consider This

I saw a large liquid stain on the storage shed floor next to barrels of solvents and drums of waste oil. I reported it to my supervisor who told me to get rid of the leaking barrels, wipe up any liquid and paint the floor to cover up the stains. She said this wasn't a serious matter and to just keep it between us. Should I report this incident?

Yes. All Employees must comply with environmental laws and Company policies, including proper disposal of waste and hazardous materials. Report this incident to your site EH&S representative, the Corporate EH&S Department or the Legal and Compliance Department. A determination will be made by EH&S with regard to whether remedial action or governmental reporting is required.



Employees are expected to:

- ◇ Understand and follow the law and Company rules and participate in Company environmental training
- ◇ Ask their manager or site EH&S representative about the environmental requirements applicable to their work
- ◇ Participate in and contribute to continuous improvement in order to eliminate or minimize the generation of hazardous waste, air emissions, wastewater discharge and energy usage
- ◇ Identify and correct conditions that could result in a spill or accidental release and *promptly and accurately report* spills or accidental releases to management
- ◇ Ensure waste and recycled materials are properly separated, managed and disposed





Protecting Information and Assets

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Financial Integrity

Keep accurate records.

The accuracy and completeness of our business records are essential to making informed decisions and to supporting investors, regulators and others. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some Employees have special responsibilities in this area, but all of us contribute to the process of recording business results or maintaining records. Ensure that the information you record is accurate, timely, complete and maintained in a manner that is consistent with our internal controls, disclosure controls and our legal obligations.

Your obligations:

- ◇ Be guided by the principles of transparency and truthfulness
- ◇ Fully account for all assets, liabilities, income and expenses
- ◇ Create business records that accurately reflect the truth of the underlying event or transaction
- ◇ Ensure financial statements are prepared according to Generally Accepted Accounting Principles and in compliance with all applicable rules, regulations and criteria
- ◇ Speak up about:
 - Any undisclosed or unrecorded funds, assets or liabilities
 - Records that are not clear, are incomplete or obscure the true nature of any action

- Schemes to defraud
- False statements
- Payments or transactions that are improper, unlawful or unauthorized
- Improper or inaccurate entries in our Company books or records

AS A PUBLICLY TRADED COMPANY, Kaman is required to file certain reports with the Securities and Exchange Commission (“SEC”) and other regulators. Our Company’s principal executive, financial and accounting officers are responsible for the full, fair, accurate, timely and understandable disclosure of all information required to be disclosed and filed with the SEC, other regulators and other public communications made by the Company.

Records Retention

Know and comply with our policy.

Various laws and regulations, as well as many of our Company’s contracts, require our Company to retain certain business records and documents, usually for a specified period of time. Each business unit is responsible for maintaining a records retention policy, which should be consistent with the law, the Company’s Records Retention and Disposition Policy and this Code.



In the case of litigation or an event likely to lead to litigation, you will be directed by the Legal and Compliance Department to suspend all regular destruction activity and preserve all documents relating to the event or litigation until the matter is resolved.

Remember ...
Company retention policies and guidelines apply to records or documents in any form or media, including electronic records.

As an Employee, you can help with document retention requirements by ensuring that you:

- ◇ Retain records for the required periods of time, and follow your business unit’s retention policies, disposing of records after they are no longer legally required to be kept
- ◇ Retain all records subject to legal holds until the Legal and Compliance Department authorizes destruction

Consider This

I understand that our records retention policy requires that certain records be disposed of after they are no longer legally required to be kept. However, I may want my records to refer to after the retention period expires. Can I choose which records to retain or dispose of?

No. You must comply with the Company’s records retention policy and may not independently determine which records to retain or dispose of. If you have questions about whether documents should be retained, contact the Legal and Compliance Department.

Company Assets

Company property should be properly cared for.

We are all responsible for protecting, safeguarding and properly using Company assets and any assets entrusted to us by our customers or suppliers. Company assets, including the use of Kaman’s information systems, should be used to conduct Company business. Any other use must comply with Company policy and be approved. Speak with your manager for guidance and to request permission if an exception is sought.

Physical Assets

Observe good physical security practices, especially those related to badging in and out of our facilities. Make sure that property is not misappropriated, sold or donated, or loaned to others without appropriate authorization. Suspected incidents of fraud or unauthorized use or transfer of Company property should be immediately reported to your manager, Human Resources representative or the Legal and Compliance Department.

COMPANY ASSETS INCLUDE:

- » Physical assets, such as property, facilities, equipment, machinery, tooling and office supplies
- » Electronic assets, such as hardware, software, networks, email, voicemail and internet access
- » Information assets including proprietary and confidential information
- » Intellectual property

Consider This

Sometimes I borrow Company tools or equipment to work on projects at home over the weekend. Is this acceptable as long as I return them on Monday?

No. Company assets are provided for Company business. You should not remove Company tools, equipment, inventory or any other Kaman asset for your personal use.

Electronic Assets and Information Systems

Like all of our other assets, our information technology is a Company resource that must be used only to further our Company’s business. Information technology includes networks, applications, computers, tablets, smartphones and cloud services provided by Kaman for business purposes. You should never use our technology or systems to support a personal business or political venture. We protect our computer systems from unauthorized access by outsiders.

Be aware that any information you create, share or download onto Company systems belongs to Kaman, and we have the right to review and monitor system use at any time, without notifying you, to the extent permitted by law. Do not expect that your communications and other activities will be kept private.

Our Company prohibits the use of unapproved third-party software programs or systems, including those that integrate with email applications to collect, store and update contact information, including names, telephone numbers and email addresses of other Employees and other individuals or entities.

PRACTICE GOOD CYBERSECURITY AND BE A GOOD STEWARD OF OUR ELECTRONIC ASSETS:

- » Do not share passwords with others including coworkers, friends or family
- » Lock your workstation when you step away and log off our systems when you complete your work for the day
- » Beware of phishing attempts– use caution in opening email attachments from unknown senders or clicking on suspicious links
- » Only use software that has been properly licensed. The copying or use of unlicensed or “pirated” software on Kaman computers or other equipment to conduct Kaman business is strictly prohibited. If you have any questions about whether or not a particular use of software is licensed, contact the IT Department.

Consider This

I’m going on vacation next week. My coworker is covering for me and asked if I would leave her my computer password before I go, so she can respond to any emails that come in. I don’t think I’m supposed to share my password with anyone, right?

Right. Make arrangements to forward your email and any documents your coworker may need to access, in advance of your trip, and keep your password private.



Information Assets Including Proprietary and Confidential Information

Kaman owns proprietary and confidential information. Employees may have access to this information as part of their employment and must keep it confidential at all times.

Proprietary and confidential information belongs solely to our Company regardless of the form or media. It must be maintained in confidence, both during and after employment with our Company. It must not be used, disclosed or appropriated for any purpose other than as authorized by our Company and for the sole benefit of our Company.

WHAT TYPE OF INFORMATION IS PROPRIETARY AND CONFIDENTIAL?

- » Methods
- » Processes
- » Trade secrets
- » “Know-how”
- » Designs and drawings
- » Equipment
- » Manuals and specifications
- » Pricing
- » Customer names, lists and information
- » Inventions
- » Unpublished sales or financial information
- » Business plans or prospects

These are just some examples. If you are unsure what information is proprietary and confidential, contact your manager or the Legal and Compliance Department.

Intellectual Property

Kaman commits substantial resources to technology development and innovation. The creation and protection of our intellectual property (IP) rights are critical to our business.

Promptly disclose to Company management any inventions or other IP that you create while you are employed by Kaman, and contact the Legal and Compliance Department if you receive any statements or questions from third parties regarding:

- ◇ The scope of Kaman’s intellectual property rights
- ◇ The applicability of Kaman’s rights to another company’s products
- ◇ The applicability of a third party’s intellectual property rights to Kaman’s intellectual property rights or products

We respect the intellectual property rights of others, too. Company policy prohibits using unlicensed software or copyrighted materials without first obtaining the owner’s permission (such as written permission from the copyright holder or a license). Improper use could subject both the Company and the individuals involved to legal liability for copyright infringement.

Never copy software from one computer to another. All installation of computer software must be supervised by the IT Department or a person authorized by the IT Department to perform that function.



WHAT ARE SOME EXAMPLES OF INTELLECTUAL PROPERTY?

- » Trade secrets and discoveries
- » Methods, know-how and techniques
- » Innovations and designs
- » Systems, software and technology
- » Patents, trademarks and copyrights

These are just some examples. If you are unsure what information is considered IP, contact your manager or the Legal and Compliance Department.

Consider This

My friend and I own a small business that we operate in our spare time and outside of working hours. I would like to contact Kaman Employees because I think they may be interested in the personal products that we sell. May I use the Company’s directory to obtain the addresses, telephone numbers or email addresses of other Employees so that I can tell them about my products?

No. Employees’ addresses, telephone numbers and email addresses are personal information and may be used only to further our Company’s business. Questions about privacy and data protection should be directed to the Legal and Compliance Department.



Data Privacy

Safeguard personal information.

Kaman strives to protect the privacy of Employees, customers, suppliers and others, in accordance with all applicable privacy and data protection laws and regulations.

If your job requires collecting, accessing, using, storing, sharing or disposing of personal information, ensure you follow our policies and all applicable laws. Only use it for legitimate business purposes. You should never disclose personal information to anyone either inside or outside of the Company, who does not have a legitimate business need for the information, nor should you use it without a valid legal reason.

We are committed to compliance with:

- ◇ All U.S. federal, state and local privacy and data protection laws and regulations
- ◇ All international privacy and data protection laws and regulations, when our Company is subject to them

WHAT IS CONSIDERED “PERSONAL INFORMATION”?

It includes anything that could be used to identify someone either directly or indirectly, such as:

- » A name
- » Email address
- » Phone number
- » Employee ID number
- » Social Security number
- » Biographical data (e.g., birth date, age, gender, race)

Communicating on Behalf of Kaman

Refer requests for information to the proper resource.

We need a consistent voice when making disclosures or providing information to the public or regulatory authorities. For this reason, each of us must ensure that only authorized persons speak on behalf of Kaman.

For:	Contact:
Requests from the media Requests for interviews Press releases	Corporate Marketing
Requests for financial or business information from outside parties	Investor Relations
Inquiries from governmental regulators or investigators Requests or visits from law enforcement Contacts by outside attorneys Requests to engage outside attorneys, for any purpose Matters related to legal proceedings	Legal and Compliance
Requests related to environmental compliance Safety and health-related matters	Environmental Health and Safety

Do not respond to the media without first seeking the appropriate guidance. Inappropriate or inaccurate responses, even a denial or disclaimer of information, may result in adverse publicity and could affect our Company’s legal or business position.

Be aware that your statements and actions can reflect on, and be interpreted as statements of, our Company. You should not imply that your statements reflect those of Kaman, unless you have received prior authorization.



Using Social Media

Be responsible in your online activities.

Kaman respects your right to use social media on your own time, but – except for very limited circumstances, such as legitimate business-related reasons, and as outlined in our Social Media Policy – Employees are not permitted to access or use social media during work hours (whether they use our systems or their device(s)).

If you engage with social media before or after work hours, do so responsibly. Make sure that any personal opinions you express are identified as your own, not Kaman’s, and take care never to:

- ◇ Breach confidential information about our Company, your coworkers, our customers, our suppliers or our business partners
- ◇ Provide nonpublic business-related information, whether material or otherwise
- ◇ Post anything that is harassing, discriminatory or disparaging connected to our Company
- ◇ Provide employment-related references or recommendations – refer all reference and recommendation requests to your Human Resources representative



Consider This

A coworker forwarded a blog post in which one of our customers complained about one of our products. I can easily address the complaint myself, but I’m not authorized to speak for Kaman. What should I do?

While it might be tempting to respond quickly, it’s best to forward the email to the Legal and Compliance Department, so they can make sure the email gets to the right individual for a response.

THE TERM “SOCIAL MEDIA” INCLUDES:

- » Blogs
- » Wikis
- » Microblogs
- » Chat rooms
- » Online message boards
- » Social networking sites
- » Social commerce postings
- » Other sites and services that permit users to share information with others



Working with Our Customers and Business Partners

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Working with the Government	30
Sourcing Responsibly	31
Protecting the Confidential Information of Others	31
Conflicts of Interest	32
Business Gifts and Entertainment	34

Honest and Fair Dealing

Treat our customers and business partners fairly.

We partner responsibly with customers, consultants, agents, contractors and suppliers, and seek competitive advantages through superior performance, never through unethical or illegal practices.

In conducting business, we:

- ◇ Tell the truth about our services and capabilities and never make claims that aren't true
- ◇ Never take unfair advantage of anyone by manipulating, concealing, misrepresenting material facts, abusing privileged information or any other unfair dealing practice
- ◇ Only promise what we can deliver and deliver on what we promise
- ◇ Never grant a request to do something that is unethical or unlawful

Talk to your manager or the Legal and Compliance Department if you have concerns about any error, omission, undue delay or defect in quality or our customer service.

Product Quality and Safety

Work to maintain trust in our products and our Company.

We must ensure the quality, safety and performance of our products as well as meet all product quality and safety specifications. Do your part to ensure complete and accurate testing and performance reporting, and never take shortcuts or make exceptions that could compromise the quality or safety of our products. Routinely check equipment and processes to ensure they conform to specifications and expectations, and always work toward continuous improvement.

Consider This

I think there may be an issue with one of the manufacturing processes at my facility, but we are behind schedule and if I say anything, we will be delayed further as the Company investigates. What should I do?

Kaman never sacrifices quality to meet a Company deadline or target. If you believe there is a safety issue or defect, report the issue to your manager or the Legal and Compliance Department immediately.



Working with the Government

Be a good partner.

Kaman supplies products and services to the U.S. government and to state, local and foreign governments. We are committed to meeting the many special legal, regulatory and contractual requirements that apply to our government contracts. These requirements may apply to bidding, accounting, estimating, invoices, subcontracting and purchasing, employment practices, contract performance, gifts and entertainment, government property and other matters. These requirements may also flow down to individuals and companies working on our behalf, including our supply chain.



Know what’s required and keep the following in mind when dealing with our government customers:

- ◇ Maintain procurement integrity – if your job involves bidding on or preparing a proposal for a government contract, know and comply with the requirements that govern that process
- ◇ Accurately and truthfully report all required information, including expenses, cost and pricing data, quality inspections and testing, specification compliance and subcontractor or supplier cost and pricing data
- ◇ Do not substitute materials or change testing or quality control requirements unless approved by governmental procedures
- ◇ Perform tests according to the contract, and document how the Company has met its contractual obligations – do not certify tests that have not been completed
- ◇ Accurately and consistently assign costs to the proper project number, contract number, name or identifier, as appropriate
- ◇ Deal with suppliers and subcontractors in a fair and reasonable manner consistent with the law and good business practices
- ◇ Honor our obligation to protect classified information and handle it in accordance with all applicable rules, regulations and security requirements
- ◇ Comply with contract terms and deliver the goods and services as promised



Sourcing Responsibly

Be objective and fair.

Kaman evaluates and engages with qualified business partners on an objective basis grounded in fairness. When selecting partners, we assess their ability to satisfy our business and technical needs and requirements.

Conduct the necessary due diligence in making decisions about consultants, agents, contractors and suppliers. All agreements must be negotiated in good faith and be fair and reasonable for both parties. Do your part to hold our business partners to our high standards and ensure they operate ethically, in compliance with the law and in a way that’s consistent with our Code, our policies and our values.

Consider This

I have just been hired from another company and have materials from my previous job that would be helpful in the work I will be doing for Kaman. Is it OK to use this material in my new job?

You can use information that is publicly available, but you cannot bring any materials that contain proprietary and confidential information from your former employer. You have an obligation to protect your past employer’s proprietary and confidential information just as Kaman Employees are obligated to protect our confidential information should they leave our Company.



Protecting the Confidential Information of Others

Safeguard the information we are entrusted with.

Our customers, consultants, agents, contractors and suppliers place their trust in our Company. Protect the confidential information they provide to us with the same degree of care as you apply to Kaman’s.

Limit any access of third-party information to those who have a need to know in order to do their job. Be alert to requests from business partners for confidential information about our customers or other business partners, if there is no associated business requirement or authorization to provide. Immediately report any loss or theft of third-party confidential information to your manager.

Our Company competes fairly, honestly and ethically. We respect the property rights of third parties, including our competitors. Do not seek out, receive or use another party’s proprietary information, trade secrets or confidential information unless permitted by law or under an approved confidentiality or nondisclosure agreement. If you are in possession of nonpublic, confidential information that was obtained from prior employment, you must continue to respect the confidential nature of that information and shall not use or disclose the confidential information of former employers.

Conflicts of Interest

Make business decisions objectively and in the best interest of our Company.

A conflict of interest can occur whenever you have a competing interest that may interfere with your ability to make an objective decision on behalf of Kaman. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, which can undermine the trust others place in us and damage our reputation.

Conflicts of interest may be actual, potential or even just a matter of perception. Since these situations are not always clear-cut, you need to fully disclose them to your manager or the Legal and Compliance Department so that we can properly evaluate, monitor and manage them.

We each have a responsibility to:

- ◇ Always make business decisions in the best interest of Kaman
- ◇ Avoid conflict of interest situations whenever possible
- ◇ Discuss with your manager or the Legal and Compliance Department full details of any situation that could be perceived as a potential conflict of interest
- ◇ Think ahead and proactively address situations that may put your interests or those of a family member in potential conflict with Kaman



Be alert to situations, including the following, which are common examples of potential conflicts of interest:

Corporate Opportunities

If you learn about a business opportunity because of your job, it belongs to Kaman first. This means that you should not take that opportunity for yourself unless you get approval from the Legal and Compliance Department.

Friends and Relatives

On occasion, it is possible that you may find yourself in a situation where you are working with a close friend or relative who works for a customer, supplier or competitor. Since it is impossible to anticipate all situations that may create a potential conflict, you should disclose your situation to your manager or the Legal and Compliance Department in order to determine if any precautions need to be taken.

Outside Employment

To make sure there are no conflicts and that potential issues are addressed, you always need to disclose and discuss outside employment with your manager or the Legal and Compliance Department. If approved, you must ensure that the outside activity does not interfere with your work at Kaman. Working for a competitor, supplier or customer may raise conflicts that will need to be resolved. Also, any approved side or personal business should not compete with Kaman.

Personal Investments

A conflict can occur if you have a significant ownership or other financial interest in a competitor, vendor, supplier or customer. Make sure you know what is permitted – and what is not – by our policies and seek help with any questions. Also, if you have a personal or financial relationship with any Kaman service provider and you have work-related responsibilities relating to that provider, you must disclose that relationship and recuse yourself from any decision-making regarding that service provider.

Civic Activities

Unless Kaman management has provided its approval, you should not accept a seat on the board of directors or advisory board of any of our competitors, suppliers, customers or partners, especially if your current job gives you the ability to influence our relationship with them.

Consider This

I have a friend who owns a business that buys equipment from Kaman, and I offered my friend a deal by reducing the profit margin on an item. The reduction would have been significantly below what Kaman charges others for this item. Kaman would have still realized a profit, but it would be much smaller than ordinarily would have been the case. Was it appropriate for me to have offered the discount?

The motivation and reason for the discount must be examined. If it was offered solely because of your friendship with the customer, then you breached your duty of loyalty to Kaman. If you felt like the discount was necessary to make an arm's-length sale, you should have raised it in advance with your manager, disclosed all of the facts of the situation and sought guidance on the best course of action. Since the offer has already been made, you have an obligation to inform your manager and the Legal and Compliance Department to report the situation and determine next steps.



Business Gifts and Entertainment

Comply with our policies to avoid even the appearance of anything improper.

Employees, along with our consultants, agents, contractors and suppliers working on behalf of Kaman, (“Kaman community”) may not give or accept gifts, meals, entertainment or other gratuities in order to influence a business decision or if doing so would create a conflict of interest or the appearance of a conflict of interest. Bribes and payoffs are always prohibited, as are extravagant, inappropriate or frequent gifts or entertainment even if they are acceptable by local custom. Members of the Kaman community are prohibited from requesting gifts, meals, entertainment, contributions, services, gratuities and items of a similar nature from suppliers, vendors, customers or the Company. All members of the Kaman community are expected to understand the applicable prohibitions and limitations before offering or receiving gifts, meals, entertainment or travel and lodging.

Gifts, meals, entertainment or travel and lodging that you receive or give must comply with Company policy. Such items must be legal, reasonable in nature, nominal in value and received or given infrequently. In addition, the receipt or giving of such items must be consistent with customary business practices and be reasonably related to the business relationship.

We should be prepared to diplomatically decline any gift or gratuity offered to us that does not meet these requirements.

Cash and cash equivalents are never acceptable to or from a customer, supplier or other third party doing or seeking to do business with the Company.

In addition, government agencies and departments, public authorities (like a mayor or a customs officer, for example) – hereafter “government officials” – often operate under strict requirements concerning the acceptance of gifts or other gratuities by their employees or family members. We must be familiar with these requirements of government officials, as well as those of customers, suppliers and other business partners who have strong relationships with government officials. The rules about what we may give to or accept from government officials are very strict and not covered in the following chart. Don’t offer anything of value to, or accept anything of value from, government officials unless you have received approval in advance from the Legal and Compliance Department.



The following table identifies the Company’s approval requirements for the giving and receipt of gifts, meals, entertainment or travel and lodging:

Gifts, Meals, Entertainment or Travel and Lodging Approval Requirements		
What Are You Giving or Receiving?	What Is the Value?	Who Must Approve?
Gifts, meals, entertainment or travel and lodging	\$250 or less*	No approval necessary
	\$251 - \$1,000*	Your business unit’s senior Finance official
	> \$1,000*	Your business unit’s senior Finance official AND the Legal and Compliance Department
*Depending on your jurisdiction, lower levels might be applicable. Contact the Legal and Compliance Department to ensure conformity with local laws and regulations.		
What Else Do I Need to Know? You are responsible for reasonably documenting and maintaining records of anything given or received, of any value, and for producing records that verify your entries when requested by your manager, a member of the management team or the Legal and Compliance Department. Business units within the Company may establish more restrictive guidelines than those set forth in the chart. Please contact your manager or the Legal and Compliance Department for more information. Note that values shown above reflect U.S. dollars. If a different currency is used, the converted amount must not exceed the U.S. dollar limitation.		

Consider This

My coworker and I visited the facility of a potential supplier. After a tour, the supplier served us sandwiches and soft drinks for lunch. When we were leaving, the supplier’s representative told us he appreciated our visit and handed each of us an envelope and brochures. My envelope contained a \$100 gift card and a note that said, “Thanks for visiting. Hope we can do business together.” My coworker received a similar note and two tickets to a sporting event where tickets are difficult to get. What should we do?

The meal was of nominal value and in keeping with regular business customs, so accepting it was appropriate. The gift card and tickets are more problematic and would require approval. Gift cards are considered cash equivalents and therefore not acceptable. Additionally, it appears that these items were given to influence a business decision, and that would violate Company policy. Inform your manager or the Legal and Compliance Department immediately and return the gifts.





Following Laws, Rules and Regulations

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Insider Trading

Don't trade on material, nonpublic ("inside") information.

Kaman's [Insider Trading Policy](#) and federal/state laws prohibit individuals with "insider" information from trading in company stock until the information has become public and the market has had a chance to react. We comply with insider trading laws not only because it's the right thing to do but also because doing so is an affirmative step in promoting compliance with federal and state securities laws and regulations. You are expected to:

- ◇ Treat nonpublic information about our Company (or companies with which we conduct business) as confidential information
- ◇ Never trade in stock or other securities if you are aware of nonpublic information about a company that could influence your trading decision
- ◇ Not share inside information or provide stock-buying or selling tips (based on inside information), with family members, friends or anyone who doesn't have a legitimate business need to know the information
- ◇ Comply with any "blackout" period restrictions Kaman imposes on the purchase and sale of Company stock (for example, when quarterly financial information is being prepared for publication or other significant events occur)

Consider This

I've learned that our Company is thinking about purchasing another business. I do not know all of the details, but I have been asked to assist with the due diligence research. May I talk about this transaction and my role with family and close friends if I do not mention the name of the company being acquired?

No. Do not discuss proposed or pending corporate transactions or provide inside information to anyone who is not involved in the transaction. Doing so may reveal confidential information and could subject you and them to potential legal action if inside information is used to trade in the securities of either company to the transaction.



Antitrust and Fair Competition

Promote vigorous competition.

Competition is vital to our free enterprise system. Because antitrust laws are complex and their impact can be significant, Kaman has created an Antitrust Compliance Guide, which summarizes significant antitrust laws and their requirements. To ensure compliance with applicable laws and promote a thriving marketplace:

- ◇ Avoid anti-competitive practices
- ◇ Be particularly sensitive to pricing and relationships with competitors and customers when conducting business
- ◇ Obtain competitive information legally and ethically (for example through public sources and customer feedback)
- ◇ Refer to the [Kaman Antitrust Compliance Guide](#) so you are knowledgeable about what's required



Consider This

I frequently attend trade association meetings as part of my job. These meetings are also attended by Kaman's competitors. What are the restrictions for discussing price-related matters among competitors?

You should never discuss prices, bids, terms, contract awards or related business information with our competitors.

ANTI-COMPETITIVE PRACTICES include agreements among competitors to:

- » Fix prices
- » Manipulate bids or proposals
- » Divide competitive markets or customers
- » Enter into exclusive dealings or reciprocity arrangements

Legal issues may also arise if we discriminate among customers through pricing or terms of sale that restrict their ability to compete.



Anti-Bribery and Anti-Corruption

Never give or accept a bribe or kickback.

Never participate in a bribe or kickback to or from anyone. Be especially aware of your actions when dealing with government officials. We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs. Kaman is committed to complying with all applicable anti-corruption laws.

In conducting business:

- ◇ Make sure you understand the definition of a bribe. A bribe is anything of value that is offered to influence a business decision, win or retain business or gain an improper advantage
- ◇ Never offer, give, solicit or accept any form of bribe, gratuity or kickback to or from anyone. This includes facilitating payments (small payments made to low-level government officials to speed up or take care of routine government actions)
- ◇ Be aware that the consequences for bribing a government official are especially severe – ensure that anything you offer to or accept from a government official complies with the [Kaman Anti-Bribery Compliance Policy](#) and is accurately reflected in our Company books and records
- ◇ Carefully monitor third parties acting on our behalf; we can be held responsible for any bribes they make on our behalf
- ◇ Avoid even the appearance of something improper

Further guidance can be found in the Kaman Anti-Bribery Compliance Program Manual located on the Kaman intranet site.



A BRIBE can take many forms, including:

- » Money (your personal funds or our Company's)
- » Gifts, meals, travel or entertainment that do not comply with our policies
- » A favor
- » A business opportunity or job offer
- » A charitable or political donation

Consider This

I work with a third party in connection with our operations in another country. I am worried that some of the money we pay them goes toward making improper payments to government officials. What action should I take?

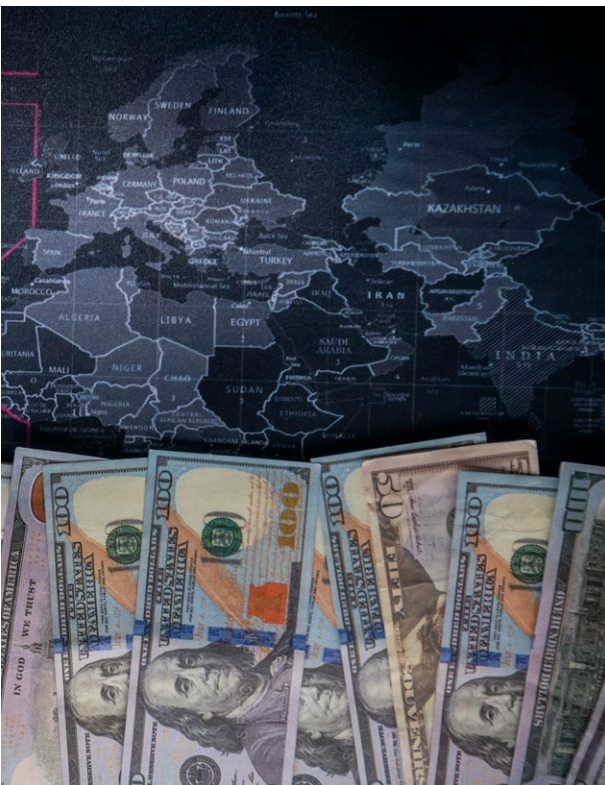
You should report your suspicions to the Legal and Compliance Department or the [Ethics Hotline](#). We can be held responsible for the acts of our third parties. If they are engaging in bribery and we fail to act, both you and Kaman could be liable. While investigating this kind of conduct can be culturally difficult in some countries, any third parties should know and understand what is expected of them. It is both important and appropriate to remind anyone doing business on our behalf of our policies and the law.

Anti-Money Laundering

We watch for and report any red-flag behavior.

Money laundering is a global problem with far-reaching and serious consequences. It is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions. Involvement in such activities undermines our integrity, damages our reputation and can expose our Company and the individuals involved to severe sanctions.

Know our customers and suppliers and only conduct business with reputable third parties engaged in legitimate business activities. If you see or suspect any suspicious financial transactions or activities, report them to your business unit's senior Finance official and to the Legal and Compliance Department.



Export Controls and International Trade

Know and comply with the requirements and restrictions that apply to international business.

Export Controls

Many countries have laws that restrict the export of goods and technology. Items that are for military purposes, or that may be involved in the development or production of products or technology for military purposes, are often a primary focus of such controls. Many commercial products and technology Kaman produces have export controls as well. The United States has controls that restrict the export of certain products, services, technical data and software to other countries, as well as the re-export of those items from one non-U.S. destination to another. If your responsibilities include export products, you are responsible for coordinating all such activities with your business unit's export compliance office.

Export and trade control laws are complex, and their impact can be significant.

UNDERSTAND THE RISKS

Export and trade violations are treated as national security matters. They can have far-reaching consequences for Employees and our Company. Violations can cause Kaman to be suspended or prohibited from engaging in export and international trade or from doing business with the U.S. government and subcontractors.

Kaman's [Export and Trade Compliance Policy](#) is to comply with applicable United States and international laws and regulations related to export and trade controls as they apply to our Company and all Employees, whether inside or outside of the United States.

Further guidance can be found in the Kaman Export and Trade Compliance Program Manual located on the Kaman intranet site.

Import Controls

Employees who are involved in the importation of products or commodities must ensure that such items are given the correct classification, valuation and country of origin and that all import documentation is accurate and complies with applicable laws and regulations.

Screening

Each business unit is responsible for screening all parties to a transaction, to include customers, suppliers, agents, third-party intermediaries and distributors to ensure that we comply with all applicable export laws and regulations.

Sanctions and Boycotts

There are also U.S. sanctions and trade embargoes against certain countries, individuals and entities associated with those countries, as well as named terrorists and drug traffickers. Kaman businesses worldwide must comply with all applicable U.S. export control and sanctions laws as well as applicable global export and sanctions laws.

To the extent we are subject to the anti-boycott provisions that require us to refuse to participate in foreign law boycotts that the United States does not sanction, we will promptly report any such request to join in, support or furnish information concerning such boycott.

Human Rights Standards

We conduct business in a manner that respects the human rights and dignity of all.

We support international efforts to promote and protect human rights and will comply with all applicable laws.

We are committed to conducting our business in a manner consistent with applicable human rights laws and regulations. We have a zero-tolerance policy for the use of child or forced labor or for human trafficking practices.

Refer to the [Kaman Human Trafficking Policy](#) for further information.

Report any suspicion or evidence of human rights abuses in our operations to your management and the Legal and Compliance Department.

CONFLICT MINERALS

Revenue from conflict minerals has been linked to funding for groups engaged in extreme violence and human rights atrocities. We work closely with [suppliers of raw materials, parts and components](#) and communicate our expectation that suppliers and vendors will comply with all applicable laws, including laws aimed at providing conflict-free minerals. Refer to Kaman's [Conflict Minerals Policy](#) for further information.





Serving the Community

In This Section:

Political Activities 43

Charitable Activities and Corporate Citizenship 43

Political Activities

Comply with political campaign finance and ethics laws.

Federal law and Company policy prohibit using Company assets to support a federal political party or candidate. In addition, there are other political laws and restrictions that apply to Kaman as a government contractor.

Our policy is not intended to discourage or prohibit Employees from voluntarily engaging in the political process on their own time or by making personal political contributions. However, you must ensure that your actions do not create the appearance of a Company activity.

You may make personal political contributions to candidates of your choice, provided they comply with the law and you do so individually and not on behalf of the Company. The Company has established Political Action Committees (“PACs”) as permitted by law. PACs may lawfully make contributions to candidates for public office. Neither the Company nor the PACs may compensate or reimburse Employees for contributions to the PACs. Employee contributions to the PACs are voluntary and are not tax-deductible.

FEDERAL AND STATE LAWS GOVERN THE COMPANY’S POLITICAL LOBBYING ACTIVITIES and require that associated activities and expenses be reported regularly and according to specific requirements. If you are engaging in any type of lobbying activity on behalf of Kaman, it must be coordinated with the Legal and Compliance Department and reported as required.

Consider This

My spouse is running for a seat on our local school board. I would like to show my support by encouraging my coworkers to vote for my spouse. May I hand out brochures, buttons and small trinkets at work to promote my spouse’s candidacy?

You are free to support your spouse’s political activities, but you may not campaign at the Company’s facilities or during work time. Using Company property such as computers, email, copiers or supplies in such political activities is also prohibited.

Charitable Activities and Corporate Citizenship

Make a difference in your community.

Our Company believes in making a positive difference in people’s lives and maintaining the health and welfare of the communities where we live and work. We promote, encourage and support a diverse range of corporate social responsibility activities.

We also encourage Employees to make a difference on a personal level, but, in general, ask that you do so on your own time and at your own expense, making sure that your activities are lawful and consistent with our policies. Unless you receive approval in advance, please do not use Kaman funds, assets or the Kaman name to further your personal volunteer activities.





A Message from Our Board of Directors

Integrity is the foundation of Kaman's success. It has fueled over 75 years of technical breakthroughs and innovation. And now that you have read the Kaman Code of Business Conduct and Ethics (the "Code"), you are better prepared to carry on this tradition of excellence for the next generation of Kaman Employees.

Kaman's Board of Directors and management recognize the important role you play in living our commitment to maintaining a workplace that conforms to the highest legal and ethical standards. The Code will help guide you on a path to doing what is both legally required and ethically appropriate for our Company, Employees, customers and shareholders, particularly in complex or difficult situations.

We encourage you to refer to the Code often, and dedicate yourself to following it. If you have questions about the Code or our policies, or if you find yourself in a difficult ethical situation, remember that you are not alone. Your supervisor and all of the other resources listed in the Code are here for you whenever you have questions or concerns.

You should feel confident that our Company is committed to maintaining the highest ethical standards, integrity and a commitment to our core values. Thank you for your dedicated service and for doing your part to build and maintain a compliant and ethical culture of which we can all be proud.



Acknowledgement Form

Certification Statement

This is to certify and acknowledge that I have received, read and understood the Kaman Code of Business Conduct and Ethics (the "Code"). I agree to comply fully with the standards contained in the Code and any related policies and procedures adopted by the Company, and understand that compliance with such standards, policies and procedures may impact my employment with the Company. I understand the Company has the right to access all Company and Employee information in connection with Company business, and I understand the Company has the right to conduct an investigation in the event a question of Code compliance should arise. In such event, I agree to cooperate fully with the Company to the extent required by law, and I agree to the disclosure of all relevant information to and by the Company.

Signature: _____

(Please print your name)

Date: _____

