

## MEMORANDUM

TO: Kaman Distribution List (attached)

FROM: Shawn Lisle, Senior Vice President and General Counsel

DATE: December 7, 2021

RE: Kaman Policy for Gifts, Gratuities, Meals and Entertainment

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Positive professional relationships with customers and suppliers are important to the success of our business. Occasionally, friendships may even be formed as a result of such interactions. As such, it is only natural during the holiday season to desire to express feelings of gratitude in the form of gifts, entertainment, meals or other gratuities, whether by giving or receiving such items. However, it is essential to recognize the importance of maintaining appropriate arms-length relationships with those whom we do business, including all current or potential customers, suppliers, distributors, agents and vendors who provide or seek to provide goods and services to our company. Kaman's policy regarding the giving and receipt of gifts, gratuities, entertainment and meals ("**Gifts**") is described more fully in the Kaman Code of Business Conduct and Ethics (the "**Code**"), accessible at <http://www.kaman.com/investors/corporate-governance>.

The Code and the policies set forth therein apply to every employee, officer and director of Kaman Corporation and each of its subsidiaries and affiliates, irrespective of geographic location. Supplemental policies or guidelines may be established by a subsidiary or affiliate, so long as such business unit policy is no less restrictive than the Code. Additionally, no business unit policy may conflict with, restrict or otherwise create ambiguities with respect to the Code. Please contact the Corporate Legal and Compliance Department if you require clarification or additional information in this regard.

As the holiday season approaches, please ensure that employees are aware of, understand and comply with their obligations under the Code and Company's policies for giving and receiving Gifts. Stress the importance of appearances that may be associated with such actions. All Gift-related activities must be based on sound business judgment and must be appropriate so as to maintain ethical and arms-length relationships with third parties. It is never appropriate to offer, give or accept funds or property to or from a government official or any other person or entity to induce or influence an action for the Company's benefit. Appropriate measures must be taken to avoid the appearance of impropriety, even when an activity is not intended to induce or influence a third party's actions.

***Please distribute this memorandum to employees within your organization, particularly those who may interact with customers, participate in the acquisition of goods and services, or those likely to receive Gifts from third parties.*** In accordance with our annual practice, attached is a suggested format for a letter that may be sent to suppliers and vendors to remind them of the Company's policy and expectations. Please feel free to modify the letter as you feel appropriate for your operations.

SGL

Attachment

**[SAMPLE FORM OF LETTER TO CUSTOMERS, SUPPLIERS, DISTRIBUTORS, AGENTS & VENDORS]**

Ladies and Gentlemen:

We extend greetings for the holiday season and our sincere appreciation to everyone in your organization who has helped us meet our commitments this year. At this time of year, we also want to call your attention to our company policy regarding the solicitation, giving and receipt of gifts, gratuities, meals and entertainment (referred to collectively herein as “Gifts”).

While we discourage offers of such Gifts whenever possible, acceptance of any Gift by a Kaman employee is limited to token items of nominal value which do not contravene any applicable law or company policy. Kaman’s policy regarding giving or receipt of Gifts is set forth in the Kaman Code of Business Conduct and Ethics, which may be accessed at <http://www.kaman.com/investors/corporate-governance>.

Under our policy, Kaman employees may not give or accept Gifts in order to influence a business decision, or if doing so would create the appearance of a conflict of interest. Extravagant, inappropriate or frequent gifts, gratuities, meals or entertainment are prohibited even if they are acceptable by local custom. Offers to our employees of cash or cash equivalents (e.g., gift certificates, gift cards, etc.) are always prohibited under our policy.

We value our relationship with your organization and appreciate your cooperation with adhering to our policy so that we may maintain our arms-length impartiality and compliance requirements. Your assistance in making our company policy known to your employees would be greatly appreciated.

In the event that your organization ever has concerns about a potential compliance or ethical matter involving our company, we would appreciate you contacting our Ethics and Compliance Hotline, which may be reached 24 hours a day at the following telephone numbers:

<b>When Calling From:</b>	<b>Dial Telephone Number:</b>
United States	866-450-3663 or 855-252-7199
Germany	0800-181-0716
United Kingdom	0800-086-8235
Mexico	01-800-436-0244
Czech Republic	800-700-742
India	000-117-855-252-7199
Hong Kong	800-96-3126
The Netherlands	0800-022-9045

Again, best wishes for a happy holiday season.

Sincerely,

DISTRIBUTION FOR: Memo dated December 7, 2021

RE: Gifts and Gratuities Policy

**Please inform the Legal & Compliance Department of any updates to this distribution list.**

**Executive Officers:**

Ian Walsh  
Russ Bartlett  
Jamie Coogan  
Shawn Lisle  
Raf Cohen  
Megan Morgan  
Kristen Samson

**Operational Leadership**

Kaman Corporation	Ian Walsh
Kaman Aerospace Group, Inc.	Russ Bartlett
Kaman Aerospace Corporation	Russ Bartlett
Kaman Aerospace Jacksonville Division	Will Zmyndak
Air Vehicles Division	Darlene Smith
Precision Products Division (Middletown)	Darlene Smith
Kaman Composites-US	Mark Withrow
Kaman Precision Products, Inc. (Orlando)	Darlene Smith
Kamatics Corporation (Specialty Bearings)	Rob Paterson
RWG Germany GmbH	Stefan Daub-Klose
GRW Bearing companies	Michael Wilhelm
EXTEX Engineered Products, Inc.	Larry Shiembob
Bal Seal Engineering, LLC	Rick Dawson

**Finance Organization**

US Finance Organization	Jamie Coogan
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Amanda Balboni  
Lisa Barry  
JC Chetnani  
John Michelin  
Michael Morneau  
Chris Simmons  
Rebecca Stath

Steve Lehman  
Tori Lipsky  
Kathy Lombardo  
Aun Maniar  
Traci Metzger  
Kevin Mulvihill  
Amy Oliver  
Linda Turcotte  
Shyam Shiwakoti  
Jamie Vincent  
Lauren Zdroykowski

RWG Germany GmbH

Christophe Leplat

GRW Bearing companies

Robert Zschietzschmann

Bal Seal Engineering, LLC

Brent Cranmer

## **Human Resources**

Kaman Corporation

Megan Morgan  
Theresa O'Callaghan

Kaman Aerospace Group, Inc.

Heather Giordano

Kaman Aerospace Corporation

Heather Giordano

Kaman Aerospace Jacksonville Division

Robert Spahn

Air Vehicles Division

Holly Tanneyhill

Precision Products Division (Middletown)

Holly Tanneyhill

Kaman Composites-US (including Wichita and VT)

Andrew Woodruff  
Emily Bouplon

Kaman Precision Products, Inc. (Orlando)

Holly Tanneyhill

Kamatics Corporation (Specialty Bearings)

Martha Gallagher

RWG Germany GmbH

Regina Grotjahn  
Melanie Muth

GRW Bearing companies

Annegret Bischoff

EXTEX Engineered Products, Inc.

Martha Gallagher

Bal Seal Engineering, LLC

Adriana Goad  
Michelle Doole

**EH&S and Risk Management**

Gary Tong  
Annette Tamalis

**Information Technology**

Raf Cohen

**Investor Relations**

Rebecca Stath

**Marketing**

Kristen Samson

**Compliance Advocates**

Kaman Corporation

Rick Forsberg  
Megan Morgan  
Chantal Obermeier  
Theresa O'Callaghan  
Gary Tong  
Jeanne Young

Kaman Aerospace Group, Inc.

Heather Giordano  
Chris Simmons

Kaman Aerospace Corporation

Air Vehicles Division

Doug Perreault  
Holly Tanneyhill

Integrated Structures & Metallics Division  
(Jacksonville & Mexico)

Bruce Dailey  
Mayra Garcia-Perez  
Carrie Smith  
Robert Spahn

Precision Products Division (Middletown)

Steve Pabst  
Holly Tanneyhill

Kaman Composites – Vermont, Inc.

Emily Bouplon  
Zachary Delurey  
Matt Reid

Kaman Composites – Wichita, Inc.

Matt Reid  
Andrew Woodruff

Kaman Precision Products, Inc. (Orlando)

Kathy Sorensen  
Holly Tanneyhill

Kamatics Corporation (Specialty Bearings)

Amanda Balboni  
Mitch Boggan  
Martha Gallagher

RWG Germany GmbH

Stefan Daub-Klose

EXTEX Engineered Products, Inc.

Mitch Boggan  
Larry Shiembob

GRW – USA:

Includes: GRW Management Inc.  
GRW High Precision Bearings, LP

Martha Gallagher

GRW - Germany:

Includes: GRW Bearing GmbH  
Verwaltungsgesellschaft Reinfurt mbH  
Gebr. Reinfurt GmbH & Co. KG

Kathrin Fuchs  
Barbara Fuernschlief

GRW – Czech Republic:

Includes: Reinfurt ČR, k.s.  
GRW ČR s.r.o

Ludmila Benesova  
Katerina Samkova

Bal Seal Engineering LLC

Foothill Ranch, CA

Brent Cranmer  
Linda Lines

Colorado Springs, CO

Michelle Doole  
Matt Pilarski

EMEA & HK (located in Netherlands)

Sureyya Gok

Kineco Kaman Composites – India Private Limited

Zachary Delurey  
Avanish Dwivedi  
Nagaraj Jantli

### **Legal and Compliance**

Shawn Lisle  
Emily Bretas Romano  
Vera DeFilippo  
Rick Forsberg  
Cyndra Lewis  
Glenn Messemer  
Daniel Sander  
Richard Smith, Jr.  
Jeanne Young