

Kaman Corporation (“Kaman” or the “Company”) recognizes that it is good business practice to manage organizational records and information in a consistent, systematic and reliable manner so they can be retained for those periods required by law and for business purposes, and retrieved as necessary for legal, regulatory, or operational reasons.

The Records Retention and Disposition Policy (“Policy”) governs the creation, classification, storage and disposition of all Records at Kaman, while enabling Kaman to comply with applicable legal, regulatory and contractual recordkeeping requirements, improving operational efficiencies, reducing litigation risk, and preserving Company history.

## **1. Purpose**

This policy:

- Defines Records and Information Management (“RIM”) guidelines for the appropriate creation, classification, retention and disposition of Records and Non-Records;
- Outlines essential roles and responsibilities associated with maintenance of and compliance with the Policy;
- Provides for the disposition of Records eligible for destruction under the Records Retention Schedule (“Schedule”); and
- Outlines exceptions to general records management practices.

Please see **Appendix A – Definitions** for a glossary of the capitalized terms found in this Policy.

## **2. Scope**

- a) This Policy applies to the Company and any related entities, including employees, temporary employees, contractors, consultants, Board Members, committee members, and anyone else who has access to, creates, has use of, or manages Kaman Records for a reason affecting or relating to the Company’s business (collectively, “Personnel”).
- b) Kaman is committed to complying with applicable recordkeeping requirements, whether captured in law, regulation, or industry best practice. Like any other organizational asset, information generated in normal business operations should be used exclusively in serving the interests of Kaman and its operations.
- c) Information generated from Kaman’s operations falls into one of two categories: Records or Non-Records.
  - i. **Records** reflect the actions, decisions and obligations of Kaman. Their legal, regulatory, business, and/or historical significance make Records subject to formal recordkeeping requirements, which are described in the Records Retention Schedule.

- ii. By contrast, there are no retention requirements for **Non-Records**. Non-Records should be destroyed once they are no longer needed, are superseded, or when related work-specific tasks are complete. Non-Records include items such as Convenience Copies, Working Papers, Drafts, Instant Messages, and Transitory Information.

### **3. Policy**

- a) Kaman will manage the retention, storage, and disposition of its Records in accordance with all applicable laws, regulations, contracts, accounting, tax, audit, or business practices. All Kaman Personnel must retain Records in accordance with the Schedule.
- b) This Policy applies to all Records regardless of storage media (such as laptop, hard drive, cloud, smartphone) or format (electronic, paper, audio, video, etc.).
- c) Kaman Personnel who create and manage Records must retain them for the Retention Period specified in the Schedule. Unless there is a legal requirement or business purpose to maintain them longer than the specified Retention Period (for example, a Legal Hold), Records should be destroyed promptly after the expiration of the applicable Retention Period.
- d) Kaman prohibits the inappropriate destruction of any records, files, documents, samples, and other forms of information. In the U.S., this policy is in accordance with the Sarbanes-Oxley Act of 2002, under which it is a crime to change, conceal, falsify, or destroy any record with the intent to impede or obstruct any official or government proceeding. Therefore, this policy is part of a company-wide system for the review, retention, and destruction of records Kaman creates or receives in connection with the business it conducts.
- e) All Records created or received in the course or conduct of the Kaman's business by any individual subject to the Policy are the exclusive property of Kaman, and are not the property of the Record's author, creator, or custodian. No Personnel has any personal or property right to any Kaman Record(s), including those Records that they drafted or helped create.
- f) Business Records should not contain language that is misleading, incomplete, inaccurate, fraudulent, harassing, embarrassing, sexually explicit, profane, obscene, intimidating, abusive, libelous, defamatory, or that violates any laws or regulations.
- g) Kaman is committed to creating authentic, reliable, and usable Records of its business activities. Deliberately creating false or misleading records regarding the Company's activities is strictly prohibited. All records pertaining to Kaman business should be thoughtfully, appropriately, and accurately worded to reflect the Company's concern for safe and ethical business practices.
- h) Records should be created with the specific purpose of communicating or documenting business matters. Kaman expects all Personnel to be mindful that Records may be

read by others aside from the intended recipient, and to act responsibly, lawfully, and professionally in connection with their creation of Kaman Records.

#### **4. Email Retention**

- a) Email should be considered an electronic method of communicating information; an email does not constitute a Record in and of itself. The information transmitted via email (email content, attachments) may qualify as a Record if it meets the definition contained in this Policy. Records in email should be managed in the same manner as a Record of any other format and stored in the appropriate repository in accordance with the Schedule and this Policy.
- b) Kaman has a practice of deleting email after one year on the servers; as such, if your email contains a record with a longer retention period, you must store the email in a repository other than your email application. If you have any questions about where or how to store email containing records which need to be kept longer than one year, please contact the IT Department or the Legal and Compliance Department.

#### **5. Record Retention**

- a) The Records Retention Schedule ("Schedule") groups Kaman Records into Record Categories and includes a retention period – how long the Records should be retained. Because the Schedule cannot explicitly list every Business Record, it does not represent an exhaustive list of examples. Rather, Kaman Personnel should use common sense, experience, and good judgment in identifying the most appropriate Record Category and applicable retention period when making retention decisions. Personnel who have questions about identifying the appropriate Record Category, or where multiple Record Categories may apply to the same document, should check with the Legal and Compliance Department for clarification.
- b) Retention Periods are assigned to Record Categories based on legal, regulatory, and business requirements. Retention periods are either time-based (for example, 7 YRS), or event-based, which begin after a triggering event has occurred (for example, Expiration of Contract + 10 YRS). If a non-U.S. jurisdiction legally requires a shorter or longer retention period for certain records, your local policy should include that requirement and you will notify the Legal and Compliance Department. Deviation from this Policy will apply to only those records which have a legally required shorter or longer retention period, not all records. Please see **Appendix B – Records Retention Schedule**.
- c) Non-Records are not subject to formal retention requirements; they are listed at the end of the Schedule purely for reference. Earlier drafts of documents and duplicates of Records should only be retained as long as an immediate business need exists. Except in cases of Legal Hold, Non-Records should be promptly destroyed after they are no longer needed.

**6. Legal Hold**

- a) In the event of certain types of legal matters, Kaman must preserve – and prevent destruction of – all Records and Non-Records relevant to that matter.
- b) If Kaman becomes involved in pending, threatened, or reasonably foreseeable litigation, regulatory investigation, or other legal matter, the Legal and Compliance Department will issue a Legal Hold Notice notifying the appropriate Kaman Personnel of the legal matter and the relevant Records and Non-Records that should be preserved until the matter is resolved.
- c) When Kaman Personnel become aware of a reasonable probability that Kaman may become involved in litigation or a regulatory investigation, they must immediately advise the Legal and Compliance Department, and must preserve any relevant Records and Non-Records.
- d) A Legal Hold suspends the normal Retention Period of all relevant Records and Non-Records regardless of format. Kaman Personnel are required to preserve relevant Records and Non-Records subject to a Legal Hold even if they are no longer needed for business purposes or are eligible for destruction under the Schedule, and shall preserve them until the Legal Department issues a written notice lifting the Legal Hold.
- e) The Legal and Compliance Department will notify appropriate Kaman Personnel when a Legal Hold is lifted and no longer applicable. At that time, any Records and Non-Records preserved under the Legal Hold will once again be subject to the terms of this Policy as otherwise provided and shall be managed according to the Schedule.
- f) Failure to obey a Legal Hold may result in adverse actions being imposed against Kaman and the violating Personnel. Violations include, but are not limited to, destroying, altering, modifying, spoliating, or otherwise making inaccessible relevant Records and Non-Records that are subject to a Legal Hold. Violations will be investigated and may result in disciplinary action.

**7. Responsibilities**

- a) Subsidiaries of Kaman Corporation. Each subsidiary of Kaman Corporation, (irrespective of [location or] tier level) shall implement and enforce this Policy by promptly adopting a records retention program and a policy consistent with, but no less restrictive than this Policy.
- b) All Personnel who create, receive, use, or manage Kaman Records are required to comply with the Policy. Failure to comply with the Policy may lead to disciplinary action.
- c) Legal and Compliance Department. The Legal and Compliance Department is responsible for the following:

- i. Providing legal advice regarding any portion of this Policy and the Schedule as it applies to any specific situation;
  - ii. Reviewing and providing legal advice regarding updates of this Policy;
  - iii. Reviewing and providing legal advice regarding updates to the Schedule, as needed in response to changing legal, regulatory or business requirements;
  - iv. Providing legal advice regarding applicable laws and regulations to Kaman Personnel; and
  - v. Initiating, managing and releasing Legal Hold Notices.
- d) Information Technology. Expertise found within the Information Technology Department is needed to implement policy settings on electronic information, and to automate records disposition where appropriate. The Information Technology department is also responsible for the following:
  - i. Supporting enterprise technology solutions necessary for the proper functioning of Kaman's Compliance Program;
  - ii. Assisting business areas with requirements scoping, selection and purchase of technology solutions that complement the objectives of the Compliance Program; and
  - iii. Providing advanced notice of proposed technology changes that could potentially impact the creation, classification, retention, or destruction of Records.

## **8. Exceptions, Changes, and Violations**

- a) Requests for exceptions or changes to this Policy should be submitted to the Legal and Compliance Department.
- b) Effective administration of this policy requires the support of all Kaman Personnel and others who deal with business-related information. Willful or negligent destruction of Records, as well as the destruction of documents (Records or Non-Records) subject to Legal Hold, constitute violations of this Policy. Personnel violating this Policy are subject to immediate discipline.
- c) Personnel who learn of a violation of this Policy should promptly report any such violations to the Legal and Compliance Department.

**APPENDIX A - DEFINITIONS**

**Convenience Copy** – One or more records created for convenient reference that duplicates the original Record, which may or may not be kept in the department of record. Convenience Copies are not considered Records and are not required to be kept according to the Record Retention Schedule, unless additional information is added to them that changes their classification to a Record. Convenience Copies should be kept only as long as they are needed for operational business purposes.

**Data** – Symbols or characters that represent raw facts or figures and form the basis of information.

**Draft** – The preliminary form of a document before it becomes a Record. In most cases, Drafts can be disposed of once a new draft is created, or the final version of a Record is finalized document is completed, not including interim final documents.

**Information** – Data that has been given value through analysis, interpretation, or compilation in a meaningful form.

**Non-Records** - Documents, files and other information not required to be retained by the Record Retention Schedule. Non-Records include Convenience Copies, Drafts, Working Papers, and Transitory Information, and should be destroyed as soon as they are no longer needed for operational business purposes.

**Record** – Any document or object that contains data and/or information and which relates to business activities or decisions of the Company. Records can exist in many forms, including writings, documents, data, software, drawings, graphs, charts, maps, email, photographs, sound recordings, video, images, or other data compilations stored in any medium from which information can be obtained. Material retained for personal reference or use is not a Record.

**Record Category** – A grouping of Records according to their particular function and assigned a common Retention Period by the Record Retention Schedule.

**Retention Period** – The period of time a Record is required to be retained by the Record Retention Schedule, whether for legal, regulatory or business purposes.

**Transitory Information** – Short-term records that are not covered by any of the other record types. Examples can include short-term reference materials and notes, out-of-office replies, routine system messages and log files, and correspondence and/or email with no ongoing business value. Transitory Records should be disposed of promptly.

**Working Papers** – Short-term records created as part of a project or in conjunction with working on a task. These records could include notes, reference materials, and other papers associated with the preparation and creation of Records. Working Papers are not considered as Records under the Record Retention Schedule and should only be kept as long as they are needed for operational business purposes.

**APPENDIX B – RECORDS RETENTION SCHEDULE**

(Minimum retention times in years unless otherwise specified)

Record Type Name	Years
<b>Accounting/Finance</b>	
Auditor' report/Annual financial statements	Perm.
Bank statements and deposit slips	10
Budgets & financial forecasts	10
Cancelled checks (fixed assets, taxes (income), important payments, tax, purchases of property, special contracts, etc.)	Perm.
Cancelled checks (general, payroll including time reports & earnings records)	10
Cash disbursements	Perm.
Cash receipts journal	Perm.
Chart of accounts	Perm.
Credit memos/Credit adjustments	10
Deeds, mortgages, bills of sale	Perm.
Electronic payment records	10
Employee expense reports	10
Fixed asset record (invoices, cancelled checks, depreciation schedules)	Perm.
Garnishments & levies (incl. Child Support documentation and Qualified Medical Child Support Orders)	10
Letters of Credit	10
Payroll (time cards and reports), journal and records	10
Production and sales reports	10
Purchase journal entries	Perm.
Trial balances (year end with supporting schedules)	Perm.
Vouchers (for payments to vendors, employees, etc.)	10
<b>Engineering</b>	
Engineering Records released into WDS (includes technical drawings/engineering orders and requests)	Perm.
Service Orders and Bulletins	Perm.
Source Code	Perm.
Design Documentation (includes System Requirements and Specifications)	Perm.
Test Documentation (includes test procedures and reports)	Perm.
Test Specifications and Reports	Perm.
<b>Legal and Compliance</b>	
Annual meeting documents and reports	Perm.
Article of Incorporation and Bylaws	Perm.
Board records	Perm.
Buy-sell agreements	Perm.
Business organization & incorporation	Perm.
Customer claims	10

Due diligence research records	5
Fraud files	10
Intellectual property records	Perm.
Investigation case files	10
Investor relations records	10
Leases (after expiration)	6
Legal correspondence	5
Mergers, acquisitions, and divestitures	Perm.
Minutes	Perm.
Partnership agreements	Perm.
Power of Attorney	5
SEC Filings	Perm.
Stock certificates and ledgers	Perm.
Trademark registrations and copyrights	Perm.
Patent and related papers	Perm.
<b>Production, Manufacturing and Quality</b>	
Calibration Records	10
Corrective Actions; internal, Supplier and Customer	10
Field Service Reports, technical publications, aircraft operational data, pilot and mechanic training files, TSO developmental records and design records (FA)	Perm.
Inspection and Test Documentation; Final Inspection Records	10
Inventory records and reports	10
ISO 9001 Management Reports(s), QMS and Quality Objective Data	10
Machine downtime	10
Production approval certification (FAA)	Perm.
Production and manufacturing records	10
Quality control records	10
Receiving inspection records; Vendor supplied packing slips, C of C's, Vendor data	10
<b>Tax</b>	
IRS adjustments	Perm.
Payroll tax returns*	10
Property basis records	Perm.
Sales and use tax returns*	10
Tax return and cancelled checks for tax payments*	Perm.
<b>Human Resources</b>	
Affirmative Action records	2
Child labor certificates and notices	3
Disability & sick benefit records (after expiration/settlement)	7
EEO-1 filings	3
EEOC case files & compliance records	10
Employment agreements	7
Employment application (from date of termination)	3



Employment eligibility verification (I-9 Form)	3
HIPAA data breach investigations and actions taken (from last action taken)	6
Investigation Cases (employment-related claims, and company responses; wrongful termination, discrimination, wage and hour, harassment, etc.)	5
Labor relations records	10
Performance/discipline records	2
Personnel files (from date of termination)	4
Pre-employment documentation (including resumes, background checks, offer letters, position descriptions, recruitment notice/job ads, etc.) (from dates of termination)	4
Records of job injuries causing loss of work (OSHA)	30
Salary and bonus planning records	7
Unemployment claims	10
Union agreements and individual employee contracts (from date of termination)	3
VET-4212 filings	3
<b>Employee Benefit Plan</b>	
Actuarial reports	Perm.
Benefit enrollment, administration & participation records	6
Benefit/Pension Plans	Perm.
Brokerage/Trustee statements supporting investments	7
ESPP and deferred compensation records	6
Financial statements	Perm.
General ledger and journals	Perm.
Information returns (Form 5500)	Perm.
IRS/Dept. of Labor correspondence	Perm.
Participant communications related to distribution, termination and beneficiaries	7
Plan and trust agreements	Perm.
Retirement and pension records	Perm.
<b>Purchasing &amp; Sales</b>	
Contracts and agreements (formal – after expiration)**	15
Contracts and leases (still in effect)	Perm.
Contracts and leases (expired)	15
Purchase orders with support files and invoices	15
Sales and work orders, and related documentation	15
<b>Export/International Trade</b>	
Audit and training records	5
Brokering activities	5
Certificates of Origin	Perm.
End-use statements, commercial invoices, vendor routing instructions (from export)	5
Export classification determinations; commodity jurisdictions, CCATS	Perm.
Licenses, agreements, other authorizations, or exemption/exceptions and supporting documents (after expiration)	5
Political contributions, fees, commissions furnished or obtained	5
Restricted party screenings	5

Voluntary self-disclosures and supporting documents	5
<b>Traffic (Receiving &amp; Shipping)</b>	
Airway bills, bills of lading	5
Customs bonds and entry packages	5
Customs rulings and notices	Perm.
Export declarations (after export)	5
Freight bills, manifests, shipping & receiving reports	5
Harmonized Tariff System (HTS) classification documentation	Perm.
Import documentation	5
Shippers letter of instruction	5
<b>Environmental &amp; Safety</b>	
Accident/Incident records	5
Air, waste water, storm water, underground storage monitoring reports & data	5
Asbestos exposure monitoring, surveys, maintenance plans (at least 30 years)	Perm.
Audiometric monitoring (duration of affected employee's employment)	Perm.
Chemical and toxic exposure records	30
Environmental (hazardous waste, storm water, DOT, spill) training	5
Environmental compliance, safety, health and security audit records	7
First aid records (not including medical histories)	5
Form R, Tier II reports (from date of submission)	5
Hazardous waste manifests, land disposal restriction forms, waste profiles	Perm.
Industrial Hygiene exposure monitoring (duration of employment, plus 30 years)	Perm.
Material Safety Data Sheets (MSDSs)	Perm.
Medical surveillance, examination, evaluation	Perm.
Noise exposure monitoring	2
OSHA 300 Injury Logs	30
OSHA Written Program and related files	5
Respirator medical testing (duration of employment, plus 30 years)	Perm.
Safety records/reports	5
<b>Insurance and Risk Management</b>	
Insurance Policies – General Liability, Umbrella and Excess Liability, Aviation Hull and Liability, International	Perm.
Insurance Policies – Workers' Compensation, Automobile Liability, Property, Ocean Cargo, Executive Protection (D&O, Fiduciary, Crime), Misc. Professional Liability/Cyber, Employed Lawyers, Medical Products Liability	5
Premium invoices	Perm.
Property Insurance Engineer Inspections	10
Claims and litigation	7 years after date of settlement

*If a non-U.S. jurisdiction legally requires a shorter or longer retention period for certain records, your local policy should include that requirement and you will notify the Legal and Compliance Department. Deviation from this Policy will apply to only those records which have a legally required shorter or longer retention period, not all records.*

Statute of Limitations

Many business managers feel that they must keep all original records for at least a certain time (seven years is most quoted in the United States), after which no action can be brought against them. In fact, there is no single statute of limitations - there are many and the time period for each statute varies depending on the particular law, state and country. Record keeping policies must be guided by the rule of reason and the probability and dollar amount of risk involved - not by statutes of limitations alone.

\* Each individual subsidiary or operating entity within Kaman may not be aware of or privy to discussions and agreements made between the various taxing authorities and the Kaman Corporate Tax Department relating to extensions of time for reviews, "closeouts" or other extensions of statutory periods. For this reason, any decisions made by any subsidiary relating to disposal or retention of tax related records and all other supporting financial records should be reviewed **in advance** with the Corporate Finance Office.

\*\* There are many different types of formal contracts or agreements, including acquisition/divestiture agreements, confidentiality agreements, insurance records and policies, employment contracts, engineering designs and patent records, government approvals/certifications and the like. However, this is not an exhaustive list and all such records should be retained for the periods specified in such documents or indefinitely if no such period is specified, until disposal of such records is approved by the Legal and Compliance Department.