



LEGAL & COMPLIANCE

MEMORANDUM

To: Kaman Distribution List (see attached)

From: Shawn Lisle, Senior Vice President, General Counsel and Chief Ethics and Compliance Officer

Date: November 30, 2022

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

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 [Corporate Governance | Kaman Corporation](#).

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 [Corporate Governance | Kaman Corporation](#).

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:

When Calling From:	Dial Telephone Number:
United States	866-450-3663
Germany	0800-1810716
Czech Republic	800-700-742
India	000-117, 855-252-7199
Hong Kong	800-963-126
The Netherlands	0800-0229045

Again, best wishes for a happy holiday season.

Sincerely,

DISTRIBUTION FOR: Memo dated November 30, 2022

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
Carroll Lane
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

Rikiese King

Air Vehicles Division

Carroll Lane
Doug Daley

Precision Products Division (Middletown)

Carroll Lane
Darlene Smith

Kaman Composites - Wichita

Roxanne Howell

Kaman Composita – Vermont

Jason Kosmas

Kaman Precision Products, Inc. (Orlando)

Carroll Lane
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

Brent Cranmer
Gary Stoffer

Aircraft Wheel and Brake, LLC

Brett Fulford

Finance Organization

US Finance Organization

Amanda Balboni
Lisa Barry
JC Chetnani
John Michelin
Michael Morneau
Rebecca Stath

Steve Lehman
Tori Lipsky
Kathy Lombardo
Aun Maniar
Traci Metzger
Kevin Mulvihill
Matthew Petterson
Jamie Ranno
Shyam Shiwakoti
Linda Turcotte
Lauren Zdroykowski

RWG Germany GmbH

Christophe Leplat

GRW Bearing companies

Robert Zschietzschmann

Bal Seal Engineering, LLC

Brent Cranmer

Aircraft Wheel and Brake, LLC

Anne Dobbins

Human Resources

Kaman Corporation

Megan Morgan
Theresa O'Callaghan
Chantal Figueiredo
Lauren Dombrowski

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)

Krysta Fast

Kaman Precision Products, Inc. (Orlando)	Holly Tanneyhill
Kamatics Corporation (Specialty Bearings)	Martha Gallagher
RWG Germany GmbH	Regina Grotjahn Melanie Muth
GRW Bearing companies	Annegret Bischof
EXTEX Engineered Products, Inc.	Martha Gallagher
Bal Seal Engineering, LLC	Adriana Goad
Aircraft Wheel and Brake, LLC	Chelsey Sabatino

EH&S

Eric Gray

Risk Management

Dina Jones

Investor Relations

Kary Bare

Compliance Advocates

Kaman Corporation

Shawn Lisle
Megan Morgan
Chantal Figueiredo
Theresa O'Callaghan
Jeanne Young

Kaman Aerospace Group, Inc.

Heather Giordano

Kaman Aerospace Corporation

Air Vehicles Division

Doug Perreault
Holly Tanneyhill

Integrated Structures & Metallics Division
(Jacksonville)

Bruce Dailey
Carrie Smith
Robert Spahn

Precision Products Division (Middletown)

Holly Tanneyhill

Kaman Composites – Vermont, Inc.

Zachary Delurey
Matt Reid

Kaman Composites – Wichita, Inc.

Matt Reid

Kaman Precision Products, Inc. (Orlando)

Kathy Sorensen

Kamatics Corporation (Specialty Bearings)	Holly Tanneyhill
	Amanda Balboni Mitch Boggan Martha Gallagher
RWG Germany GmbH	Regina Grotjahn Andrea Zehgruber
EXTEX Engineered Products, Inc.	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 Fuernschliel
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 Adriana Goad Linda Lines
Colorado Springs, CO	Matt Pilarski
EMEA & HK (located in Netherlands)	Sureyya Gok
Kineco Kaman Composites – India Private Limited	Zachary Delurey Avanish Dwivedi Nagaraj Jantli
<u>Legal and Compliance</u>	Shawn Lisle Lynne Adler Emily Bretas Romano Vera DeFilippo Glenn Messemer Daniel Sander Richard Smith, Jr. Jeanne Young