



Code of Business Conduct and Ethics





OUR VISION:
Propelling Our
Customers Forward
by Imagining and
Delivering Highly
Engineered Solutions

The Kaman Leadership Team

A MESSAGE FROM OUR CHIEF EXECUTIVE OFFICER

As we carry forward Kaman's legacy, it is essential to embrace our core values in every decision and interaction. This means being transparent, respectful and responsible in our relationships with customers, colleagues and stakeholders. Our Code also encourages us to speak up when we encounter unethical behavior or situations that conflict with our principles, reinforcing a culture where everyone feels empowered to uphold our standards.

Every one of us has a part to play in defining our Company. The Kaman Code of Business Conduct and Ethics is an important tool for helping us do that. The pages ahead lay out clear expectations that apply to every Employee and manager at our Company. The Code will help you stay in compliance with the law and our policies and guide you towards the right decisions when things get complicated. It provides guidance on navigating ethical challenges and making decisions that align with our values. It serves as a framework for fostering a culture of integrity and accountability, ensuring that every action we take reflects our commitment to excellence.

By continuously referring to our Code of Business Conduct and Ethics, we can confidently navigate the complexities of our work environment. It not only helps us make informed choices but also strengthens our reputation as a trusted partner in the industry. Together, let's ensure that Kaman remains synonymous with innovation, integrity and exceptional service as we strive to propel our customers forward.

Ross Sealfon

Ross Sealfon
President and CEO
Kaman Corporation

OUR CORE VALUES

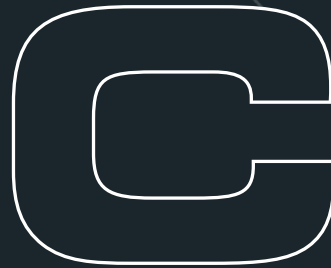
As we continue to grow as a global company, it has become ever more important to explicitly define the core values that guide our behavior and shape our culture.

The Kaman management system is built to drive **A**ccountability, **C**ollaboration, and **E**mpowerment — **ACE**.



ACCOUNTABLE

We measure what matters, follow through, and learn from outcomes.



COLLABORATIVE

We solve problems together and share tools, insights, and successes.



EMPOWERED

Teams closest to the work make decisions and own results.

A Message from Our Chief Executive Officer

Our Core Values

05

HONORING OUR CODE

Purpose and Overview
Complying with Laws
and Regulations

Our Responsibilities

- Employees
- Supervisors and Managers

Guidelines for Ethical
Decision-Making

Asking Questions,
Reporting Concerns

Our Commitment to
Non-Retaliation

Accountability

Waivers and Changes
to Our Code

13

PROMOTING A SAFE AND RESPECTFUL WORKPLACE

Embracing Diversity
and Inclusion

A Harassment-Free
Kaman

Safety and Security

- Emergency Preparedness
- Workplace Violence
- Substance and Alcohol Abuse

Environmental
Compliance

19

PROTECTING INFORMATION AND ASSETS

Financial Integrity

Records Retention

Company Assets

- Physical Assets
- Electronic Assets
- Information Assets
- Intellectual Property

Data Privacy

Communicating on
Behalf of Kaman

Using Social Media

29

WORKING WITH OUR CUSTOMERS AND BUSINESS PARTNERS

Honest and Fair
Dealing

Product Quality and
Safety

Working with the
Government

Sourcing Responsibly

Protecting the
Confidential
Information of Others

Conflicts of Interest

- Corporate Opportunities
- Friends and Relatives
- Outside Employment
- Personal Investments
- Civic Activities

Business Gifts and
Entertainment

37

FOLLOWING LAWS, RULES AND REGULATIONS

Antitrust and Fair
Competition

Anti-Bribery and Anti-
Corruption

Anti-Money Laundering

International Trade

- Export Controls
- Import Controls
- Screening
- Sanctions and Boycotts

Human Rights Standards

43

SERVING THE COMMUNITY

Political Activities

Charitable Activities and
Corporate Citizenship

Acknowledgment Form





HONORING OUR CODE

In This Section:

- Purpose and Overview
- Complying with Laws and Regulations
- Our Responsibilities
 - Employees
 - Supervisors and Managers
- Guidelines for Ethical Decision-Making
- Asking Questions, Reporting Concerns
- Our Commitment to Non-Retaliation
- Accountability
- Waivers and Changes to Our Code

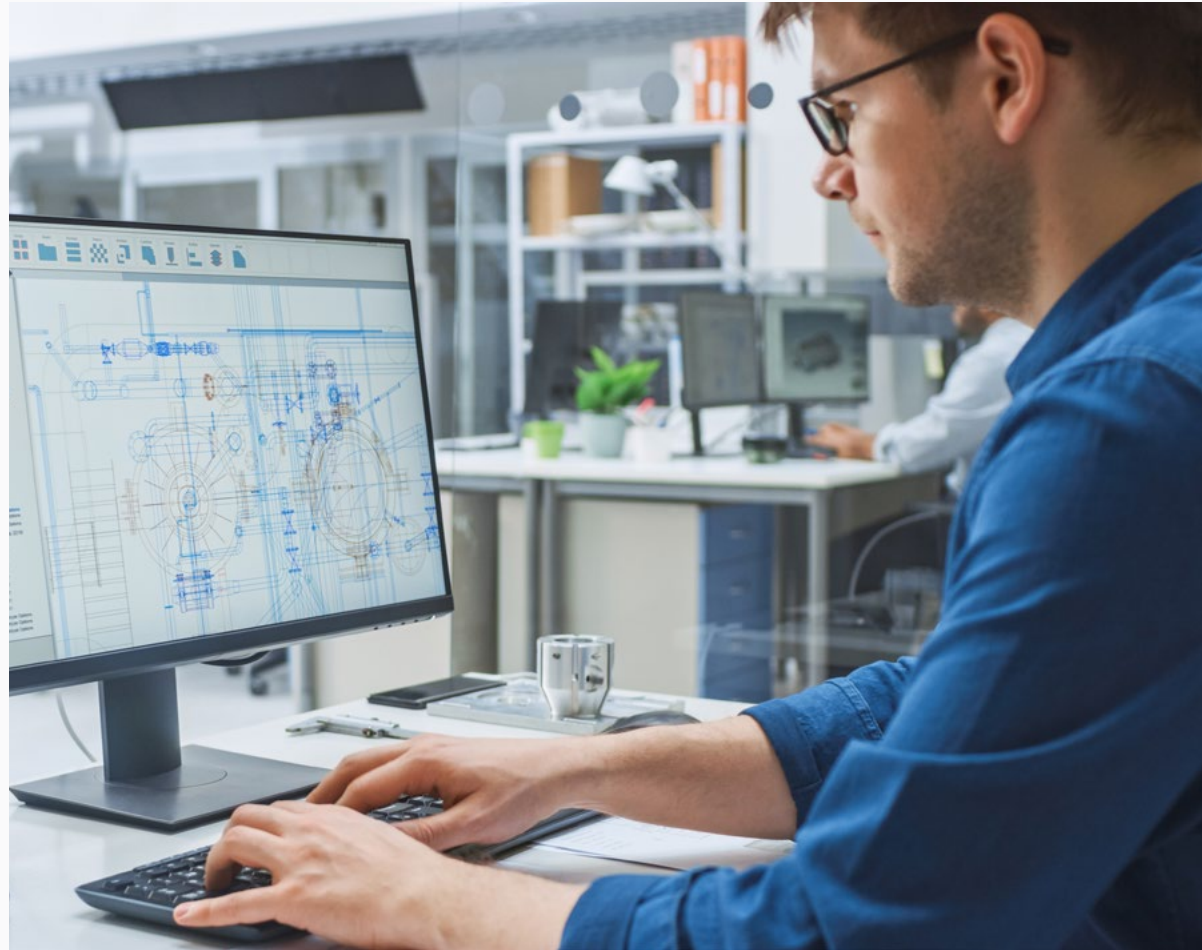
PURPOSE AND OVERVIEW

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 and officers (“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



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 are also subject to certain complex and far-reaching laws associated with that work.

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 your management.

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.



Consider This

A recently adopted law in one of the states where we do business conflicts with a policy in our Code. But according to news reports, the law is likely to be overturned in the courts. Should I just ignore this new law and continue business as usual?

As a company that operates in many jurisdictions around the world, it's important to be aware of the various laws and regulations governing the way we do business and to respect the norms and customs of customers, business partners and coworkers everywhere. That said, all Employees have a responsibility to comply with the standards and principles of this Code. If a change in local laws or regulations conflicts with our Code, don't try to navigate the issue yourself. Seek guidance from your management before taking any action.



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 management 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 your management 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.



Remember ...

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

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
- 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 your management 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



Consider This

I'm a manager and have noticed several Employees on a different team not using required personal protective equipment. I brought the issue to the attention of that team's manager, and he said he's fine with it. He thinks the PPE is redundant and that his Employees are happier and more efficient without it. Should I just drop the issue?

No. While you are chiefly responsible for individuals under your supervision, all Kaman Employees and managers are required to report misconduct and policy violations. That includes violations by fellow managers. If the other manager isn't responding to the issue after you've brought it up, you should seek guidance from your Human Resources representative or your management.

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**:

- 1** Is it legal?
- 2** Does it comply with the Code of Business Conduct and Ethics?
- 3** Would it serve the best interests of Kaman?
- 4** Would you be proud to see it in the headlines?

If you answer **"no"** or **"I'm not sure"** to any of these questions, stop and check with your management before proceeding. Remember, in any situation, under any circumstances, it is always appropriate to ask for guidance.



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.

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 management. If you are uncomfortable speaking with your management, there are resources available to help you:

- Contact another member of management or your Human Resources representative
- 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 ask for a physical meeting.

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.

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 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.



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
- Discharge
- Probation
- Required payment for loss or damages
- Suspension

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

In This Section:

- Embracing Diversity and Inclusion
- A Harassment-Free Kaman
- Safety and Security
 - Emergency Preparedness
 - Workplace Violence
 - Substance and Alcohol Abuse
- Environmental Compliance

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

One of my coworkers has a habit of telling jokes aimed at certain ethnic groups. It offends me and others on our team. How can I get this to stop?

Kaman prohibits this type of behavior. Discuss the issue with your coworker and ask them to stop. If you're uncomfortable approaching them directly — or if you have spoken with them and the behavior continues — speak to your management or Human Resources representative.

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 management, Human Resources representative or the [Ethics Hotline](#).



Consider This

A coworker I've worked with closely for years has started referring to me as her "work husband" and making occasional jokes about what a hypothetical romantic relationship between us would be like. These jokes make me uncomfortable, but she hasn't made any explicit romantic or sexual overtures toward me. Should I say something?

Your coworker's intentions are not what matters. Harassment is based on how a reasonable person receives another person's words or actions. No one should have to endure feeling uncomfortable like this at work. If you feel comfortable discussing the issue with your coworker, you could ask her to stop. But if you're uncomfortable — or the behavior continues or escalates — contact your management, Human Resources representative or the [Ethics Hotline](#) to report the conduct and discuss your concerns. Kaman does not tolerate retaliation against anyone who makes a good faith report of an incident of harassment.

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 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 management or site Environmental Health and Safety (EHS) 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



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

EMERGENCY PREPAREDNESS

In the event of an emergency or natural disaster, protecting people and business operations — in that order — is our priority. Employees should be familiar with their facility's business continuity plans and prepared to carry them out should an unexpected event occur.

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

The key fob system to enter our facility has been glitchy and unreliable lately. Team members must pass in and out of the door frequently, and it seems unlikely that an unfamiliar person would slip through. Is it okay if we keep it propped open during the workday?

Security systems are in place to keep Employees safe and facilities protected. We never deliberately tamper with, disable or otherwise circumvent these systems — even if you feel like it's a minimal risk. You should report the broken key fob system to a facilities manager or the Environmental Health and Safety Department and request immediate repairs.



ENVIRONMENTAL COMPLIANCE

Be a good steward of our planet.

Kaman is committed to proactively protecting the environment and human health. The Company strives to:

- Minimize the generation of hazardous waste
- Promote sustainable use of natural resources
- Monitor water and electrical energy consumption

Kaman also strives to conduct its business in compliance with all applicable environmental protection laws and regulations. The [Kaman Environmental Compliance Guide](#) outlines the environmental laws and requirements we are subject to as a Company. Refer questions to your EHS representative.



Consider This

I have noticed an employee disposing of waste in a way that seems harmful to the environment, but I'm not sure, and it's not in my area. Should I just mind my own business?

Proper disposal of waste is everybody's business. Even if you're not sure, it's appropriate to raise your concerns to your site EHS representative so they can follow up and ensure compliance with environmental laws and Company policies.

Employees are expected to:

- Understand and follow EHS laws and Company rules and complete all assigned Company environmental training
- Ask their management or site EHS representative about the environmental requirements applicable to their work
- Participate in and proactively contribute to reducing the generation of hazardous waste, air emissions, wastewater discharge and energy usage
- Ensure that waste and recycled materials are properly separated, managed and disposed of
- Identify and correct conditions that could result in a spill or accidental release
- Promptly and accurately report spills or accidental releases to management



PROTECTING INFORMATION AND ASSETS

In This Section:

- Financial Integrity
- Records Retention
- Company Assets
 - Physical Assets
 - Electronic Assets
 - Information Assets
 - Intellectual Property
- Data Privacy
- Communicating on Behalf of Kaman
- Using Social Media

FINANCIAL INTEGRITY

Keep accurate records.

The accuracy and completeness of our business records are essential to making informed decisions. 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 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 that 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

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.

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

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 destruction is authorized



Consider This

While doing a regularly scheduled records purge, I accidentally destroyed several records that weren't due to be deleted for another two months. Is it alright to just keep quiet about the mistake until someone brings it up?

No. Mistakes happen, but it's important to be honest and transparent when they do. You should report the mistake to your management who can help you resolve the issue, either by working to recover the records or by properly documenting the mistake.



Remember ...

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

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 management for guidance and to request permission if an exception is sought.

If you work remotely, your responsibilities to protect Company assets remains the same. Take good care of physical, electronic and information assets (including any intellectual property) assigned to you, and remember that your time is also a valuable Company asset. Put in the same number of hours and level of effort as you would in an office setting, and be available to your coworkers during regular work hours. Do what is right and required, even without direct supervision.

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 management.



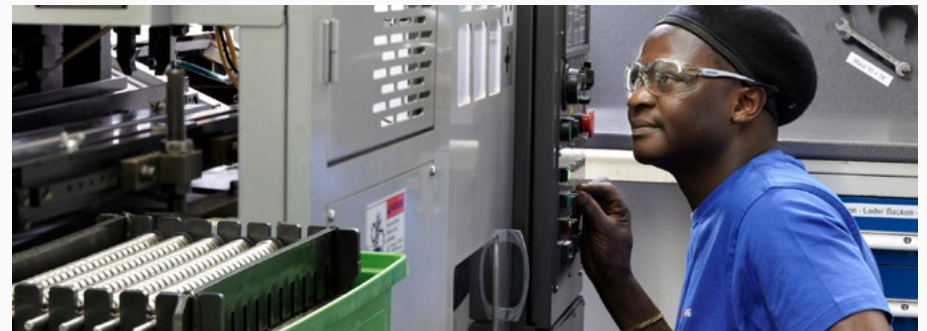
Consider This

My husband operates a small business out of our house. If he supplies the paper and I do this after hours, is it okay for me to make copies of a mailer for him on our copy machine at work?

No. You should not use Kaman property — including computers, copiers or other assets — to support your husband's business.

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



ELECTRONIC ASSETS

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.



Consider This

I received an email from a friend on my work computer. I didn't even know that this friend had my work email address ... now, I'm wondering if it's really from my friend. How can I be sure a suspicious email is safe?

Most phishing attempts are aimed at getting you to open an attachment, click a link, provide credentials or send money. Anytime you're suspicious, contact the sender (in this case, your friend) directly to confirm the email's validity.

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

INFORMATION ASSETS

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 management.

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 your management any inventions or other IP that you create while you are employed by Kaman. Contact your management if you receive any statements or questions from third parties regarding:

- The scope of Kaman's IP rights
- The applicability of Kaman's rights to another company's products
- The applicability of a third party's IP rights to Kaman's IP rights or products

We respect the IP 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 management.



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 that 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



Consider This

I received an email from a coworker in Human Resources that wasn't meant for me. It contains a list of Employee names and salary information. What should I do?

Don't read or share the information with anyone else. Let the sender know that the email was not sent to the right address and delete the email. Then report the incident to your management, privacy officer or other appropriate resource so that steps can be taken to further address the incident, if necessary, and to coach the sender on their duty to protect confidentiality.

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 providing information to those outside of Kaman. For this reason, each of us must ensure that only authorized persons speak on behalf of Kaman.

Requests for information include but are not limited to:

- Requests from the media
- Requests for interviews
- Press releases
- Requests for financial or business information from outside parties
- 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
- Requests related to environmental compliance
- Safety and health-related matters

Do not respond to the media or any outside party without first seeking the appropriate guidance from your management. 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 — 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

Sometimes I talk about things that happen at work on my personal blog — is that a problem?

It depends on what you share. Make sure your postings do not violate our Code or our policies — in general, anything that is unacceptable in the workplace is unacceptable online. Be careful not to disclose confidential information about Kaman, its customers or suppliers and never post anything that is harassing, abusive or discriminatory.

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

In This Section:

- Honest and Fair Dealing
- Product Quality and Safety
- Working with the Government
- Sourcing Responsibly
- Protecting the Confidential Information of Others
- Conflicts of Interest
 - Corporate Opportunities
 - Friends and Relatives
 - Outside Employment
 - Personal Investments
 - Civic Activities
- Business Gifts and Entertainment

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 management if you have concerns about any error, omission, undue delay or defect in quality or our customer service.



Consider This

I've noticed that one of the tests we perform on a component is repeated further down the production line. In order to speed up delivery, could we consider eliminating one of the tests?

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. We follow all laws, regulations, and Company policies, standards and procedures to meet rigorous quality standards, and we hold our vendors, suppliers and others in our supply chain to the same high standards.

Do your part:

- Complete all required training and ask questions if something isn't clear
- Ensure complete and accurate testing and performance reporting
- Routinely check equipment and processes to ensure that they conform to specifications and expectations
- Always work toward continuous improvement
- Never take shortcuts or make exceptions that could compromise the quality or safety of our products
- Speak up immediately about any quality or safety concerns

If you are a manager, you have the added responsibility to ensure that your Employees are properly trained and that you address any safety or quality concerns that are reported to you.

Discuss the tests with your management. Efficiency is valued here, and process improvements are welcome, but suggestions must be properly reviewed and vetted to make sure there is no deviation from what is required and no adverse effect on quality or safety. Unless and until the testing protocols change, continue testing at both points, as required.

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. Relationships must be based on mutual trust and respect, with each party committed to meeting its obligations and operating at the highest standards of business integrity.

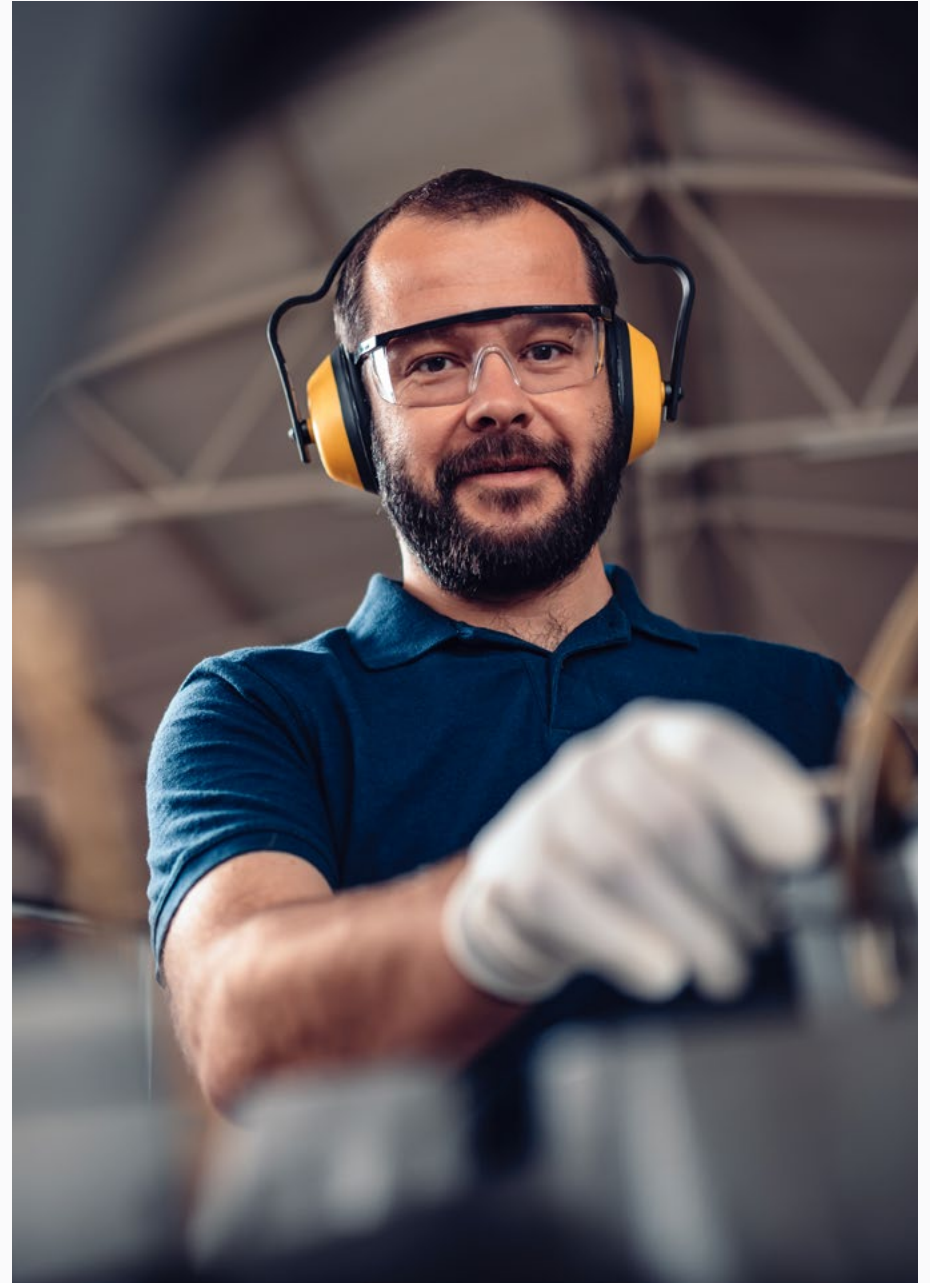
We source responsibly, based on objective criteria such as quality, price, experience and delivery record, assessing our partners' ability to satisfy our business and technical needs and requirements.

In the selection of Kaman consultants, agents, contractors, suppliers and other business partners:

- Conduct the necessary due diligence in making decisions
- Negotiate in good faith and ensure that all agreements are fair and reasonable for both parties
- Don't allow personal relationships or conflicts of interest to affect or impact your decision-making

Once a contract is in place:

- Monitor our business partners' performance and communicate our expectations
- Hold our business partners to our high standards and ensure that they operate ethically, in compliance with the law and in a way that's consistent with our Code, our policies and our values
- Build compliance throughout our supply chain by ensuring that our business partners comply with laws aimed at keeping operations free of corruption and human rights abuses



PROTECTING THE CONFIDENTIAL INFORMATION OF OTHERS

Safeguard the information we are entrusted with.

Our customers, consultants, agents, contractors, suppliers and other business partners 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 management.

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.



Consider This

A new Employee on our team used to work for one of our competitors and offered to share information about some projects their former employer was developing. Is that okay?

No, it's not. It's okay to share general knowledge and skills learned from an old job. But new projects or product ideas (including files, drawings, presentations, concepts, marketing ideas — called "work product") are confidential, and your coworker has a responsibility to protect their former employer's proprietary and confidential information just as you would be obligated to protect our confidential information should you leave Kaman.



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 management 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 management the 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 your management.

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 management 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 management. 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

One of our suppliers has asked if I would be willing to do some work for their company “on the side.” Would this pose a conflict of interest?

It depends. If you are responsible for managing or making decisions about our relationship with that supplier, that would create a conflict of interest. And even if you do not have decision-making authority with respect to this supplier, there could be a conflict if the work you’re doing competes in any way with our business or interferes with the time or talent you bring to your work at Kaman. Disclose the opportunity to your management to assess and determine the best way forward.

BUSINESS GIFTS AND ENTERTAINMENT

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

Employees, along with our consultants, agents, contractors, suppliers and other business partners 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 or entertainment 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/departments and 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 your management.

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

| GIFTS, MEALS OR ENTERTAINMENT APPROVAL REQUIREMENTS | | |
|--|--------------------|--|
| What Are You Giving or Receiving? | What Is the Value? | Who Must Approve? |
| Gifts, meals or entertainment | \$1 - \$5,000* | Approval: Business Unit Senior Finance Official |
| | > \$5,000* | Approval: Business Unit Senior Finance Official AND Kaman Corporation Senior Finance Official |
| *Depending on your jurisdiction, lower levels might be applicable. Contact your management 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 management.

Business units within the Company may establish more restrictive guidelines than those set forth in the chart. Please contact your management 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

What if I receive an expensive gift from a supplier that exceeds the thresholds in our policy?

You must return the gift and politely explain our policy. If it’s not possible to return or decline the gift (for example, a holiday basket sent to the office), contact your management.



FOLLOWING LAWS, RULES AND REGULATIONS

In This Section:

- Antitrust and Fair Competition
- Anti-Bribery and Anti-Corruption
- Anti-Money Laundering
- International Trade
 - Export Controls
 - Import Controls
 - Screening
 - Sanctions and Boycotts
- Human Rights Standards

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

At a recent trade association meeting, a competitor suggested we agree to bid only on certain contracts and not on others, to make it more fair for everyone. Maybe that was a joke, but I'm not sure.

You should never discuss prices, bids, terms, contract awards or related business information with our competitors. A joke like this is no laughing matter and, in fact, could violate antitrust laws, so take prompt action. Put a stop to the conversation, leave the room, document what happened and report the conversation to your management.

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.



Consider This

A long-time trusted supplier has offered me a commission for securing an annual contract for their company.

A “commission” doesn’t sound like a bribe. Is it?

Yes. Regardless of what the supplier calls it, offering a payment in exchange for a decision — the award of an annual contract — could be a kickback or a bribe, both of which are illegal. Let the supplier know that the offer is inappropriate and that you will follow Kaman’s standard policies and procedures in making a supplier selection. Then advise your management about the incident.

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

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 your management.



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.

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.

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.

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 comply with all applicable laws, respecting the rights, freedoms and standards of treatment all individuals are entitled to.

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
- Complying with the employment laws of the countries in which we do business
- Combatting human trafficking and slavery in our supply chains
- Never knowingly conducting business with any individual or company that participates in human rights abuses
- Reporting any suspicion or evidence of human rights abuses in our operations or the operations of our business partners to management

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
- Charitable Activities and Corporate Citizenship

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 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.

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 approved by your management and reported as required.



Consider This

I am very excited about an upcoming political campaign and the candidate that I'm supporting. May I send an email to my coworkers using my Kaman email address urging them to vote for this person?

No, Kaman encourages you to be active in civic affairs, but you may not use Company resources to support your candidate. Doing so could give others the impression that Kaman supports your political position. Keep your personal political activities personal, and don't use our assets (including Company time, funds, assets — such as our email system — or the Kaman name) to advance the campaign.

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.



ACKNOWLEDGMENT 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: _____

Printed name: _____

Date: _____

