

# **KAMAN** CORPORATION

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Export & Trade Compliance Policy

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***Export and Trade Compliance Policy***

**OUR POLICY:**

As responsible citizens in the global marketplace, Kaman Corporation and each of its business units (individually a "segment" and collectively, the "Company") are committed to compliance with all U.S. and international laws and regulations relating to import and/or export controls that apply to the Company as a manufacturer, importer, and exporter of technology, technical information, equipment, and services\*. This responsibility extends beyond exports to reexports, imports, and various activities of both U.S. and non-U.S. persons while in the U.S. or overseas, which relate to the transfer of physical items, information, and technology. Further, this responsibility extends to any Company employee whose activities relate to these types of transfer. The Company recognizes that effective implementation of this Policy requires a robust compliance program and management is committed to support that program.

The Company expects each employee involved in export and international business matters to comply with all applicable laws consistent with the Kaman Code of Business Conduct. In accordance with the Company's Export and Trade Compliance Program, segment management is expected to implement a comprehensive system of documented policies, procedures, and training approved by the Corporate Export and Trade Compliance Office. The Program's core components are expected to include the following minimum key elements: management commitment, appropriate employee conduct, assignment of responsibilities, training, understanding, awareness, and implementation. The Corporate Export and Trade Compliance Office will provide guidance and support to segment management in the implementation of the program.

The Company expects each of its employees to recognize that the company's engagement in international trade is a privilege afforded by the U.S. Government. Each employee should be aware that a failure to comply with this Policy or the Export and Trade Compliance Program, or applicable legal requirements, whether or not intentional or knowing, could result in disciplinary action, up to, and including termination, civil and/or criminal prosecution, substantial fines to the individual and the Company, and/or imprisonment. Such violations may also cause suspension or revocation of the Company's ability to engage in import and export trade or to transact business with U.S. Government agencies and subcontractors.

\* These laws include, but are not limited to, the Arms Export Control Act (AECA), the International Traffic in Arms Regulations (ITAR), the Export Administration Regulations (EAR), The Foreign Trade Regulations (FTR), and regulations administered by the Office of Foreign Asset Control (OFAC).

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**SPECIFIC RESPONSIBILITIES**

United States trade regulations prohibit anyone from engaging in certain conduct, whether within or outside the United States, whether personally or on behalf of the Company. Such prohibited conduct is subject to change from time to time and includes the following activities:

- Those activities involving an individual person or entity, or a country to the extent that such activity is subject to trade restrictions imposed by the U.S. government. Such restrictions can include sanctions, embargoes, or Denial Orders that prohibit Kaman Corporation from engaging in certain business activities. These restrictions may apply to individual persons, entities, countries, or combinations thereof.
- Those activities involving prohibited end-use of a Controlled commodity, technology, technical data, or service; or prohibited activity by a U.S. person in support of the following: Proliferation of Nuclear Weapons, Chemical or Biological Warfare, Missile Technology, acts of Terrorism or support Terrorist-supporting entities.
- Exporting, reexporting, or other transfer of a Controlled commodity, technology, technical data, or service, without a license or other required authorization from the U.S. Government.
- Exporting, reexporting, or other transfer of a Controlled commodity, technology, technical data, or service from one non-U.S. party to another non-U.S. party, in which the controlled U.S. origin content exceeds the maximum thresholds for Controlled content, without a license or other required authorization from the U.S. Government.
- Exporting, reexporting, or other transfer of a commodity, technology, technical data, or service from one non-U.S. party to another non-U.S. party, that is the direct product of Controlled U.S. origin technology, technical data, or service, without a license or other required authorization from the U.S. Government.
- Violating or otherwise circumventing the terms or conditions of a license or other required authorization from the U.S. Government.
- Proceeding with any import, export, or reexport transaction with the knowledge that a violation has occurred or will occur.

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*Note: For the purposes of the preceding directives, "Controlled" is defined to mean any commodity, technology, technical data, or service; or activity by a Company employee; including when relating to military or defense, that is subject to restriction, limitation or prohibition by any agency or regulation of the United States Government.*

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Segment management is expected to designate a segment Export Control Official who will coordinate with the Corporate Export and Trade Compliance Office as appropriate. Each Company employee is expected to consult with her/his respective segment's Export Control Official or other Company Export and Trade Compliance personnel, prior to negotiating a new transaction or engaging in any new activities that involve foreign products, persons, entities, or countries to determine the applicable export and trade compliance restrictions, limitations, or controls. The respective segment Export Control Official or other Company Export and Trade Compliance personnel should also be consulted in the course of any existing or amended transactions or activities involving export and trade compliance restrictions, limitations, or controls where it is reasonable to expect that further review may be appropriate. In the event of any questions or concerns, the Corporate Export and Trade Compliance Office should be consulted.

No policy statement or procedure can address all possible situations or transactions explicitly. Where any situation or transaction arises that is not addressed in this Policy or the Export and Trade Compliance Program, or in any case of a suspected violation of this Policy or legal requirements, the employee should contact their respective segment Export Control Official or the Corporate Export and Trade Compliance Office to determine appropriate steps to resolve the matter.