

KAMAN CORPORATION

Export & Trade Compliance Policy

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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 laws and regulations, whether U.S. or foreign, relating to export and trade controls that apply to the Company as a manufacturer, importer, and exporter of physical products, technology, technical information, and services. This responsibility extends beyond exports to re-exports, 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 that implementation and to supporting that program.

The Company expects each employee involved in export and international business matters to comply with all applicable laws and regulations, including but 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 Assets Control (OFAC).

Segment management is expected to implement a comprehensive system of documented policies, procedures, and training. 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 Compliance Office will provide guidance, support and direction, as required, 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. and foreign Governments. Each employee should be aware that a failure, whether intentional or not, to comply with this Policy, a provision of the Export and Trade Compliance Program, and any applicable international trade law or regulation, 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 international trade or to transact business with U.S. or foreign Government agencies and subcontractors.

Specific Responsibilities

U.S. and foreign trade regulations seek to protect U.S. national security and foreign policy interests by limiting or prohibiting persons or companies from engaging in certain conduct which might harm U.S. and foreign interests. These prohibitions apply to all individuals, whether within or outside the U.S., and whether they are acting personally or on behalf of the Company. The parameters of such prohibited conduct are subject to change from time to time, but include the following activities:

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- Engaging in activities with individual persons or entities, or a designated country, to the extent that such activity is subject to trade restrictions imposed by the U.S. or foreign Governments. Such restrictions can include sanctions, embargoes, debarments, or Denial Orders that prohibit the Company from engaging in certain business activities involving prohibited end-use of a controlled commodity, technology, technical data, or service; or prohibited activity in support of any of the following: Proliferation of Nuclear Weapons, Chemical or Biological Warfare, unauthorized sharing of Missile Technology, Acts of Terrorism or support of Terrorist-supporting entities.

- Exporting, re-exporting, or other transfer of a controlled commodity, technology, technical data, or service, without a license or other required authorization from the appropriate U.S. or foreign Government.

- Exporting, re-exporting, or other transfer, from one non-U.S. party to another non-U.S. party, of a controlled commodity, technology, technical data, or service that is the direct product of controlled U.S. origin technology, technical data or service; or in which the controlled U.S. origin content exceeds the maximum thresholds for such controlled content, 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. or foreign Government.

- Proceeding with any export or re-export transaction with the knowledge that a violation has occurred or will occur.

Segment management is expected to designate a segment Export Compliance Official (“ECO”) who will coordinate with the Corporate Export Compliance Office as appropriate. Each Company employee is expected to consult with their respective segment's ECO or his/her designee prior to negotiating a new transaction or engaging in any new activities that involve controlled products, or Non-U.S. Persons, entities, or countries to determine the applicable export compliance restrictions, limitations, or controls. The respective segment ECO or his/her designee should also be consulted as necessary during the execution of existing programs to ensure that the activities taking place remain in compliance with any authorizations obtained by the Company or export control laws or regulations. In the event of any questions or concerns, the Corporate Export 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 ECO or the Corporate Export Compliance Office to determine appropriate steps to resolve the matter.