



## **U.K. MODERN SLAVERY ACT SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This document is intended to comply with the U.K. Modern Slavery Act, which requires certain corporations to prepare a Slavery and Human Trafficking Statement each fiscal year.

Even prior to the passage of the U.K. Modern Slavery Act, Kaman historically had in place rules against using forced labor, including illegal child labor, slave labor and abusive punishment of workers. Kaman's Code of Business Conduct and Ethics (the "Code") states, in pertinent part:

"We strive to comply with the employment laws of each country in which the Company operates or conducts business. The use of forced, child, or slave labor is not allowed, nor is the abuse or physical punishment of any person providing services to or on behalf of the Company. The compensation paid to workers and working conditions must meet or exceed the legal requirements for each applicable jurisdiction. We expect all employees, contractors and suppliers to abide by these principles."

In accordance with Kaman's policy, all active employees receive annual training and must recertify their commitment to follow the Code each year. Additionally, Code training and certification is required for all newly hired or rehired employees, consultants, temporary workers, and apprentices within 14 days of commencement of work.

Kaman also implemented the Kaman Combatting Trafficking In Persons Policy, which is posted on the Kaman Corporation internet web site under "Governance". Such Policy states, in pertinent part:

"In support of the United States Government policy prohibiting trafficking in persons ... we expect our employees and suppliers to not engage in the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, to not procure commercial sex acts, or engage in trafficking of persons."

Kaman makes human trafficking awareness training available to company management and personnel. Training is specifically emphasized for employees having supply chain management responsibility so that they are trained to recognize and mitigate such risks within the supply chain.

The standard terms of purchase for Kaman and its subsidiaries have been modified for new supplier and subcontractor agreements to add provisions prohibiting the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, procuring commercial sex acts, or trafficking of persons. Any material violation of law relating to basic working conditions and human rights, including laws regarding slavery and human trafficking, may be considered a material breach and grounds for contract termination for default.

The Chief Ethics and Compliance Officer issued a memorandum to all Kaman employees reiterating that individuals may report, without fear of retaliation, any suspected human rights violations. Compliance posters were distributed to all Kaman operating locations to provide employees with contact information for reporting such concerns.