

BARNES AEROSPACE

Political Expenditures and Public Policy Matters

As a premier provider for the full life-cycle supply and repair of complex aero-engine components from fan to exhaust, Barnes Aerospace is subject to various federal, state, and local laws and regulations. These laws and regulations can significantly affect how we implement our mission, which is “empowering people to leverage their creativity, talent and commitment to excellence to perform at their best and improve customers’ performance . . . every day,” and how we create value for stockholders.

Recognizing the effect of laws and regulations, Barnes Aerospace balances its long-standing policy against political contributions (even when permitted by law) with responsible participation in public policy matters that impact Barnes Aerospace’s business objectives.

Below are the key policies regarding political expenditures and public policy advocacy.

1. Barnes Aerospace does not have a Political Action Committee (PAC).
2. Barnes Aerospace does not make corporate contributions (either directly or through employee reimbursements) to political candidates, their election campaigns or political parties.
3. Barnes Aerospace is a member of various industry and trade groups that represent the aerospace and manufacturing industries and that are focused on matters that can impact Barnes Aerospace’s business objectives. The purpose of these groups is to advance the common goals and interests of its members. Barnes Aerospace’s participation as a member of these groups comes with the understanding that we may not always agree with their positions and/or those of other members, and that we are committed to voicing our concerns as appropriate through our colleagues who serve on the boards and committees of these groups.
4. Directors, officers and employees are permitted to participate in civic and political activities, so long as these activities are on their own time and at their own expense and do not otherwise interfere with the conduct of Barnes Aerospace’s business. While employees may participate as individual citizens in the political process, decisions to do so are entirely voluntary. A director, officer or employee may make personal political contributions to a candidate or political action committee with only non-reimbursable personal funds. Except as otherwise specifically approved in advance by the Office of the General Counsel, directors, officers and employees are prohibited from using any Barnes Aerospace property or facility, or the working time of any Barnes Aerospace employee, for any political activity.

The Corporate Governance Committee of our Board of Directors oversees Barnes Aerospace’s practices concerning political expenditures and public policy matters, including Barnes Aerospace’s membership and participation in trade associations that engage in lobbying and/or make political contributions, and management reports to the Committee periodically.

For purposes of this statement, the term “political contribution” is defined as any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, services, anything of value or use of Barnes Aerospace equipment, supplies, time, or other property, for the purpose of influencing any election, referendum, or ballot initiative.

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