



Code of Business Ethics and Conduct

Velocity. Integrity. Teamwork.

Table of Contents

A Message from Our CEO	3	Working with Our Government Customers	27
Our Values	4	Complying with International Trade Controls	28
Introduction to Our Code	5	Our Commitment to Our Communities	29
Using Our Code	6	Preserving and Protecting Our People and Our Environment	30
Following Our Code	6	Respecting Human Rights	31
Our Responsibilities	6	Participating in the Political Process	31
Seeking Advice and Raising Concerns	7	Investing in Our Communities	32
Making Ethical Decisions	8	Amendments and Waivers of Our Code	33
Acting in the Best Interests of Our Company	9		
Recognizing and Avoiding Conflicts of Interest	10		
Keeping Accurate Records	12		
Protecting Company Property	13		
Safeguarding Confidential and Proprietary Information	14		
Speaking with One Voice	15		
Our Commitment to Our People	16		
Keeping Our Workplaces Safe and Secure	17		
Respecting Our People	18		
Embracing our Global Workforce	19		
Preventing Harassment and Bullying	20		
Our Commitment to Our Customers and the Marketplace	21		
Delivering Quality Products and Services	22		
Avoiding Bribery and Corruption	23		
Giving and Receiving Gifts and Entertainment	24		
Competing Fairly	25		
Working with Our Business Partners	26		

A Message from Our CEO, Mike J. Mosley

At Barnes Aerospace, our success stems not only from the products we create and the customers we serve but also from the commitment of each of you and the way we work together every day. Our operating system, VITAL, embodies our Values: **Velocity, Integrity, and Teamwork**. This system unites us on a global scale and distinguishes us within the aerospace industry. VITAL guides our decision-making, influences how we treat one another, and enables us to serve our customers effectively. These principles are not merely words; they are the foundation of our culture and are essential for our ongoing growth and success.

Barnes Aerospace's **Code of Business Ethics and Conduct** is grounded in our Values. The Code helps us navigate both challenges and opportunities with clarity and confidence. I encourage you to take the time to read the Code and understand how it applies to your role at Barnes Aerospace. Acting with **Integrity** and embodying our Values are crucial for maintaining the trust of our customers, partners, and each other.

If you ever have any questions or concerns, please speak up. **Teamwork** is essential to our success, and we want everyone to feel comfortable raising issues in good faith. Together, we can act decisively and with **Velocity** to find solutions and work toward our goals.

Thank you for your commitment to Barnes Aerospace and our Values. I look forward to continuing to push the boundaries of what's possible and shape the future of the organization as "One Barnes Aerospace Team."

Mike J. Mosley
CEO, Barnes Aerospace



Our Values

V	I	T	AL
 <p>VELOCITY</p> <p>Speed with Direction</p> <ul style="list-style-type: none"> • Make smart, data-driven decisions. • Align early and own decisions. • Learn fast. Prioritize and execute quickly. 	 <p>INTEGRITY</p> <p>Always Do the Right Thing</p> <ul style="list-style-type: none"> • Be responsible and reliable. • Commit to quality. Follow through on commitments. • Ensure accuracy and dependability. 	 <p>TEAMWORK</p> <p>Operate and Perform as One Team</p> <ul style="list-style-type: none"> • Ensure safety for all. • Collaborate with respect. • Be accountable. Build trust through open communication. 	 <p>...ACHIEVES LIFT</p> <p>Elevate Business Performance</p> <ul style="list-style-type: none"> • Increased customer trust and loyalty. • Greater innovation and continuous improvement. • A "winning" team culture.

Our Values guide our work, our decisions, and the culture we create together, for each other and our customers. **Velocity**, **Integrity**, and **Teamwork** give us a common framework and shared language for navigating change, solving problems, and moving forward together to **Achieve Lift**.



Introduction to Our Code



Velocity. Integrity. Teamwork.

Consistent with our global presence, the Barnes Aerospace Code of Business Ethics and Conduct is available in English, Polish, Malay, and Traditional Chinese. It is intended to transcend geography to instill our Values everywhere we do business. Our Code gives us the tools to make something better, to Achieve Lift.

Using Our Code

Barnes Aerospace is committed to following high ethical standards and doing business lawfully around the world. The Barnes Aerospace Code of Business Ethics and Conduct outlines those high ethical standards and sets the expectation that all employees act with honesty and integrity. Our Code is not intended to address every situation and answer every question. Instead, it provides guiding principles, practical direction, and helpful resources to assist each of us in making ethical and lawful decisions.

Following Our Code

Our Code applies to all Barnes Aerospace employees, officers, and members of the Board of Directors and unites us across geography and cultures. As a global company, we follow the law and this Code in all countries where we do business.

Every employee, officer, and director is responsible for reading, understanding, and following the Code. Employees should contact the Legal & Compliance Department if there are any questions regarding a local law and the Code of Business Ethics and Conduct. Employees who violate the Code are subject to discipline, up to and including termination of employment.

Our Responsibilities

Barnes Aerospace has earned an excellent reputation. To protect that reputation, we all have a personal responsibility to:

- Follow the Code and other Company policies, procedures, and guidelines, including the Barnes Aerospace Employee Handbook.
- Complete assigned training on time.
- Ask questions if we have any doubts or concerns.
- Report, in good faith, possible illegal or unethical behavior, or violations of our Code or related Company policies.
- Not retaliate against anyone for raising questions or concerns in good faith.
- Fully cooperate and be truthful in any audit, inquiry, or investigation.

Additional Responsibilities for Managers & Supervisors

Managers and supervisors have a special responsibility to lead in accordance with our Values and be a champion of our Code. They must take steps to positively influence employees and create an environment where employees are comfortable raising questions or concerns without fear of retaliation or reprisal. Additionally, managers and supervisors have the following responsibilities:

- Allow employees time to complete required training.
- Take professional and timely action with respect to questions or concerns raised in good faith.
- Do not compromise safety or compliance to obtain business results.
- Do not create rules or policies that are less restrictive than our Code.
- Be a positive role model by acting in accordance with our Code.
- Recognize and reward behavior that exemplifies commitment to our Code.

Seeking Advice and Raising Concerns

We all need to feel comfortable raising questions and concerns. Our Company takes every question and concern seriously. At times, you may need help answering questions and making decisions. When in doubt, ask before acting.

We have several resources for seeking advice or raising concerns, including:

- Any manager or supervisor.
- Your Human Resources representative.
- The Legal & Compliance Department.
- The Barnes Aerospace Compliance Hotline.

We are all responsible for reporting, in good faith, suspected or potential violations of our Code, our Company policies, or any law. Know that you can always talk to your Human Resources representative or supervisor. When it comes to reporting concerns, we have an open-door policy.

You may also report a concern anonymously by mail, phone, or online through the Company Compliance Hotline. The Compliance Hotline is available 24 hours a day, 7 days a week. It is answered by an independent third-party provider and accommodates all languages our employees speak. Our Company will take all appropriate steps to preserve the confidentiality and identity of anyone who makes a report or raises a concern in good faith. Contact details for the Hotline are listed below:

Report Via Phone



Report Online



Report By Mail

Barnes Aerospace Corporate Compliance Hotline
P.O. Box PMB 3767
13950 Ballantyne Corporate Place, Ste. 300
Charlotte, NC 28277-2712



If you witness, commit, or come to learn of a potential violation, you should immediately report it to at least one of the resources listed above. You should not investigate on your own.

Barnes Aerospace has a non-retaliation policy. We will not tolerate any form of retaliation against any person for raising a question or concern in good faith. "Good faith" means the report is honest, sincere, and complete to the best of the person's knowledge.

Our Advice

Q. Can I make an anonymous report?

A. Yes, you may, by using the Company Compliance Hotline. However, it may make investigating your concerns more difficult if we are unable to contact you for more information. Providing your name and contact information also allows us to keep you informed about the status of an investigation. Remember, we will take all appropriate steps during the review or investigation process to preserve the confidentiality and anonymity of anyone who raises a question or concern in good faith and stand behind our principle of non-retaliation.

Making Ethical Decisions

When trying to make the right decision, ask yourself the following questions:

1. Am I following the applicable law, policy, or practice?
2. Am I acting in the best interests of our Company by making decisions aligned with our Values?
3. Did I consult with someone at our Company to assist with my decision?
4. Would I feel comfortable if my colleagues, family, friends, or the public knew of my decision?

If the answer is yes to all of these questions, proceed with confidence, knowing that you are supporting our commitment to Velocity, Integrity, and Teamwork.

If the answer to any question is no, or if you are not sure, do not proceed and seek help from one of your supporting resources.



Acting in the Best Interests of Our Company



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Our continued success, goodwill, and reputation rely on acting in alignment with our Code of Business Ethics and Conduct and in the best interests of our Company.

Recognizing and Avoiding Conflicts of Interest

Our Beliefs

We put the interests of Barnes Aerospace and our customers above our own personal interests so we can make smart business decisions free from bias. Conflicts of interest, even the appearance of a conflict of interest, harm our integrity and reputation.

Our Reasons

Making sound, unbiased decisions free from conflicts of interest earns trust from our stakeholders and keeps us aligned across our Company, leading to better results.

Our Actions

- Recognize that personal relationships could interfere with our objectivity and create a conflict of interest.
- Promptly disclose real or potential conflicts of interest to your HR Manager.
- Examples of conflicts of interest include:
 - **Any interest or independent relationship you may have with a supplier, vendor, agent, consultant, customer, or competitor**
 - **Family relationships where you may directly or indirectly influence your relation's employment at Barnes Aerospace**
 - **Outside employment**
 - **Financial interests that may influence your judgment regarding company matters**
- Seek advice from your HR representative or the Legal & Compliance Department when you suspect there may be a conflict of interest.



What Is a Conflict of Interest?

A conflict of interest occurs when your personal affairs interfere with your ability to make objective work decisions.

Common Conflicts

Workplace Relationships. Personal relationships with others in the workplace may lead to favoritism. Even the appearance of bias can erode the strength of our team.

Business Relationships. We should not be involved in decisions about whether to use a vendor or supplier if we have a personal relationship with someone who works there. Relationships with competitors may also create problems.

Outside Employment. Ensure that outside jobs or other activities do not hinder our responsibilities or contributions to Barnes Aerospace. Working for a competitor or supplier of Barnes Aerospace would create a conflict of interest.

Financial Interests. Investing in businesses linked to Barnes Aerospace is a potential conflict of interest. Ensure that personal investments—and those of friends and relations—do not influence our decisions on behalf of our Company.

These are not all the situations where conflicts of interest may arise. If you are unsure whether a conflict exists, seek help. In most cases, we can manage conflicts of interest carefully when they are properly disclosed.

Q&A

- Q.** I work in procurement and need to replace a supplier immediately so we can meet our customer deadline. My brother owns a company that provides the materials we need at a lower rate. May I hire his company?
- A.** First, you must disclose the potential conflict to your manager and Human Resources. You may refer your brother's company to procurement, which will follow the standard supplier selection process. But you may not be involved in any decision-making involving his firm. Remember, we should avoid appearances of favoritism and always follow standard processes.
- Q.** I am an engineer at the Company. At a recent conference I attended, I was asked by a representative of the Aerospace Industries Association to deliver a 30-hour certification program, for which they want to pay me an honorarium. May I accept this offer?
- A.** No, you may not accept payment for outside opportunities that arise because of your employment with Barnes Aerospace. Talk to your supervisor about it. If it is something that would benefit Barnes Aerospace as a whole, you may be able to participate. In this case, however, the association would not be able to pay you directly.



Keeping Accurate Records

Our Beliefs

Through many years and many changes, Barnes Aerospace has conducted business honestly. Our records must accurately reflect our business, and our accounting and financial reporting procedures must be fair and truthful.

Our Reasons

Accurate recordkeeping ensures the long-term health of our business. Strategic decisions depend on accurate information, and as a company, we rely on such decisions to move forward. We have a responsibility to maintain accurate records for our stakeholders.

Our Actions

We keep our records accurate when we:

- Maintain careful and complete books and records.
- Follow generally accepted accounting principles (GAAP).
- Adhere to financial laws and regulations.
- Never selectively edit records that have not met their retention requirement.
- Submit required reports to U.S. and other global regulatory authorities.
- Cooperate openly, honestly, and fully with Company financial officers and our auditors.
- Know the risks of inaccurate or fraudulent recordkeeping and communicate accordingly.
- Keep and dispose of records according to law and Company records retention requirements.
- Comply with any retention or “hold” notice from the Legal & Compliance Department.

All employees have a responsibility to follow our internal controls and maintain records that accurately reflect our business transactions. Certain employees, including our CEO, CFO, Controller, and accounting employees, are held to higher standards. Though we should all be aware of the importance of keeping accurate records, some roles are more directly involved than others. Our accountants and financial officers must ensure that reports are full, fair, accurate, and timely. Fraudulent financial reporting is prohibited.

What Is Fraudulent Financial Reporting?

In general, fraudulent financial reporting is intentionally misleading or incomplete. It can take many specific forms and may also result from recklessness.

What Is a “Hold” Notice?

The Legal & Compliance Department is sometimes able to recognize a matter that may lead to an investigation or litigation. They may then issue a hold notice on records that would likely be required in such a case. In these instances, we must follow legal advice and preserve the relevant documents.

Audits and Investigations

On occasion, we may have audits or investigations. We all have a shared responsibility to cooperate in these situations. Auditors and investigators may ask for specific information. If you are unsure what information an auditor or investigator is entitled to, seek guidance from the Legal & Compliance Department. If you are required to produce information, make sure it is accurate and that you keep the information and the investigation confidential.

Business Records

Business and financial records can take many forms, both paper and electronic. Some examples include:

- Inventory data and production reports
- Purchase orders and invoices
- Personnel files
- Email and other correspondence (memos, instant messages, text messages, letters, etc.)
- Policies and procedures
- Contracts
- Software
- Analyses, schedules, formulas, tables, and financial models

This list is by no means exhaustive. If you are unsure about how best to keep, maintain, and dispose of Company records, ask your supervisor. You can also check the Records Retention Policy.

Protecting Company Property

Our Beliefs

As a global company, Barnes Aerospace has acquired an array of properties. These assets are essential to the work we do. Company property, including office space, manufacturing equipment and tools, vehicles, computers, and networks, supports our business. We innovate best when we maintain and protect those properties.

Our Reasons

Comfort in our environment enables us to do our best work. We need access to the best possible resources, including facilities, vehicles, and supplies. These resources cannot support our vision if they are mistreated.

Our Actions

We can all use common sense to protect Company property. When we keep workspaces clean and well-maintained and ensure that our technology is up to date, we reduce the chance of Company property breaking down. Keep your managers informed of any work-related equipment that may need to be fixed or replaced. This ensures not only productivity but also safety.

In addition, we protect Company property when we:

- Follow all security and safety procedures for entering and exiting Company property.
- Keep an eye out for theft and report suspicious activity.
- Follow all safety procedures when using Company equipment.
- Adhere to protocols for use of Company assets such as computer devices, vehicles, and products.
- Practice strong cybersecurity habits to protect Company networks and data. These habits include:
 - **Using strong, unique passwords and never sharing them**
 - **Locking your computer when stepping away**
 - **Avoiding suspicious links, attachments, or websites**
 - **Reporting phishing attempts or unusual system behavior immediately**
 - **Enabling computer updates**
 - **Using only approved devices and secure connections when accessing Company systems remotely**



Safeguarding Confidential and Proprietary Information

Our Beliefs

Our confidential information is part of what distinguishes us from our competitors and makes us unique. Acting with integrity means protecting that information from unauthorized use or disclosure.

Our Reasons

Our continued success depends on proprietary information, especially our manufacturing know-how. When we develop new ideas, methods, and services, we strengthen our ability to adapt and provide a competitive advantage. To best leverage this information, we all have an obligation to protect and not disclose our confidential and proprietary information.

Our Actions

We safeguard confidential and proprietary information when we:

- Share such information only with employees who are authorized to use it.
- Employ nondisclosure, license, services, and collaboration agreements with third parties.
- Clearly label files or documents as “Confidential,” as appropriate.
- Secure documents, data, and devices with effective physical measures, passwords, and encryption.
- Do not discuss confidential matters in public or make them visible to others (e.g., when working on a laptop in a café).
- Do not upload or input confidential and proprietary information into unauthorized artificial intelligence platforms.
- Escort visitors so they cannot enter restricted areas.
- Report any breaches so they can be addressed promptly.

It is important that we also do not share or seek confidential information from competitors or share information about former employers.

What Are Some Examples of Confidential Information?

Confidential business information can take many forms. Some examples include:

- Proprietary information such as software, industrial designs, and manufacturing processes
- Trade secrets, trademarks, and other intellectual property
- Non-public financial information, such as pricing and projections
- New product and marketing plans
- Customer and supplier lists
- Research and development ideas and information

Employee Privacy

We keep all our employees’ Personally Identifiable Information (PII) and data secure and confidential. Some examples of personal employee information include:

- Name
- Home address
- Personal email address
- Employee identification number
- Government identification number (e.g., passport number or driver’s license number)

If employees have questions about keeping confidential information secure, please consult with the IT security team.

Speaking with One Voice

Our Beliefs

We maintain our reputation by speaking clearly and honestly. We share the responsibility for maintaining consistent communication and strive to present a unified voice to stakeholders outside the Company. Our customers and business partners rely on this approach.

Our Reasons

Both traditional and social media have the potential to spread misinformation. To address this, clarity is essential. By communicating with a single voice, accurately and honestly, we can shape our narrative, protect sensitive information, and minimize confusion. This clarity reassures our stakeholders as we adapt and grow.

Our Actions

Some team members are directly responsible for responding to inquiries from outside the Company. We can best support these individuals by:

- Responding politely if we are not authorized to handle an outside inquiry.
- Referring such inquiries to the appropriate person, providing accurate contact information.
- Never sharing personal opinions about Company decisions, employees, customers, or business partners.
- Never disclosing sensitive or confidential information.

Social Media

Social media has greatly expanded our communication channels. Platforms like LinkedIn, Facebook, Instagram, TikTok, and X provide tremendous benefits, but we must use them wisely. When engaging on social media, we must take care to:

- Ensure our use of social media does not interfere with work.
- Never reveal confidential Company information.
- Never represent our personal views as those of the Company.
- Avoid being negative or disparaging.

We encourage employees to share positive experiences and Company-published content that reflect our culture and Values. However, avoid engaging in public debates about Company decisions, financial performance, or confidential matters. When posting about Barnes Aerospace, make it clear that you are expressing your own views and do not represent the Company's official position. Leave more specific messaging to authorized employees. This ensures that the Company's voice is preserved for our customers, business partners, and stakeholders.



Our Commitment to Our People



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Our employees are our greatest strength and a key driver of our success. Staying true to our purpose and our commitment to creating opportunities for everyone remains essential.

Keeping Our Workplaces Safe and Secure

Our Beliefs

A safe workplace is the foundation for a productive workplace. We are all responsible for keeping and maintaining safe work environments, following safety protocols, and making safety-conscious workplace decisions.

Our Reasons

No operational metric is more important than safety. Productivity and business should never be pursued at the expense of our well-being. We thrive as a company and do our best work when we are all healthy, safe, and secure.

Our Actions

We keep our workplaces safe and secure when we:

- Conduct operations in full compliance with all safety laws, regulations, and policies, wherever we do business. This includes:
 - **Always follow established safety rules and procedures, including risk assessments, Management of Change, and any task-based safety authorization processes, for example, Lock Out Tag Out or Confined Space.**
 - **Always wear required PPE in designated areas and complete all safety training as required to remain qualified and fit to perform assigned work.**
 - **Always wear seat belts and use hands-free communication devices when driving to and from work, and when conducting Company business.**
 - **Never perform work while under the influence of alcohol, illegal drugs, the improper use of prescription medications, or while experiencing any condition that may adversely affect safe work performance.**
- Report all safety concerns, violations, near misses, and unsafe conditions immediately to your supervisor or HSE Manager, and document them within the safety management system in accordance with internal procedures.

- Ensure doors and gates remain closed and locked in accordance with site-specific policies, and only allow authorized personnel to access our facilities.
- React to emergencies using prescribed procedures, including contacting law enforcement or regulatory authorities when necessary. Ensure that all incidents are investigated, corrective actions are identified, and improvements are tracked to closure.

Our Advice

- Q.** I work in Barnes Aerospace, and I recently noticed a potentially hazardous step in one of our manufacturing processes. How do I best express my concerns?
- A.** We rely on our engaged employees to proactively contribute to the development of our business processes. You should communicate with your supervisor and the HSE manager for your business unit immediately. Our HSE management system encompasses risk assessment, development of procedures, and safety training, among other things. Your observations can support our goal of promoting employee safety.
- Q.** My work requires the use of personal protective equipment. Will the Company supply this equipment?
- A.** Yes. In compliance with OSHA and equivalent global standards, the Company provides required personal protective equipment at no cost to employees. Do not begin work without appropriate personal protective equipment and procedures in place.

Respecting Our People

Our Beliefs

Fairness begins with respect. We are all entitled to dignity and respect in the workplace. Our employees thrive in a workplace free from discrimination and disrespectful behavior. Everyone should have an equal opportunity to contribute to the success of the Company.

Our Reasons

By respecting each other, we create a work environment where all can do their best work. A respectful work environment starts with fairness in hiring and access to opportunities. This ensures that our business is our focus and that all employees can reach their full potential.

Our Actions

- Always treat each other with dignity and respect.
- Recognize each other's strengths and accomplishments.
- Never say or do anything offensive or degrading to others.
- Speak up if we witness disrespectful or offensive behavior.
- Focus on qualities that bring value to our business.
- Delegate meaningful work.

Our Talent Management System (TMS) reflects our commitment to supporting both applicants and employees throughout hiring and career progression. Grounded in our Values, the TMS supports the growth, development, and engagement of our employees so they can perform their best. Each employee brings unique experiences that make our Company stronger.



Embracing our Global Workforce

Our Beliefs

Our global business thrives because of the talent, expertise, experience, and dedication of our employees. We prioritize teamwork, development, and engagement to ensure every employee can contribute to our success.

Our Reasons

When we work together and leverage our collective strengths, we make better decisions and deliver results. Seeking out different perspectives and ideas helps us innovate and stay competitive.

Our Actions

We strengthen our teams when we:

- Build teams based on skills, experience, and performance.
- Share information openly and invite input from all team members.

- Actively consider multiple viewpoints when solving problems.
- Listen with courtesy and respect.
- Treat everyone fairly and consistently, focusing on job performance and results.
- Never discriminate on the basis of race, religion, sexual orientation, disability, or any other factor irrelevant to job performance.

Around the World

Barnes Aerospace employs about 3,000 people around the world. Our commitment to globalization is reflected in how we work seamlessly across borders, partnering with employees, vendors, and customers from diverse cultures. These relationships thrive on integrity and respect, and we take seriously the voices and perspectives that contribute to our global business.



Preventing Bullying and Harassment

Our Beliefs

We all benefit from a safe and respectful work environment. Workplace harassment and bullying have no place in such an environment.

Our Reasons

Harassment and bullying are extremely disruptive and unprofessional. Our employees are enthusiastic contributors to the success of the Company. When we maintain a harassment-free workplace, our employees' enthusiasm can continue to drive the success of the Company.

Our Actions

- Never make offensive jokes or comments, especially regarding race, religion, gender, disability, or other aspects of personal identity.
- Never make inappropriate physical contact, including unwanted touching.
- Never use threatening or intimidating language or behavior.
- Never make sexual advances or propositions, and never share graphic or sexually explicit materials.
- Complete all training obligations in a timely and professional manner.

- All employees have an obligation to report harassment and bullying to one of your supporting resources.

What Is Bullying and Harassment?

Bullying and harassment can come in the form of words, actions, or images.

- **What we say or write:** This can include racial slurs or offensive jokes, made either in person or over email or social media. Aggressive or threatening language can also be shared this way.
- **What we do:** Any unwelcome touching, especially of a sexual or suggestive nature, is harassment. Aggressive or deliberately disruptive acts, such as blocking a person's path, are also forms of bullying and harassment.
- **What we display:** Placing offensive or pornographic images or posters in the workplace is considered harassment. Cubicles, office space, and screen space are all considered workplace areas where these types of images should not be displayed.

Remember that intent is not what matters when it comes to bullying and harassment. The perception or reaction of others is the key element. Consider the feelings and well-being of co-workers when speaking, writing, acting, and decorating.



Our Commitment to Our Customers and the Marketplace



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Our customers and the marketplace look to us for reliability, partnership, and innovation. We provide this, and more.

We continue to deliver excellence and anticipate solutions for our customers and the market.

Delivering Quality Products and Services

Our Beliefs

Barnes Aerospace's reputation is built on the quality of our products and services. We provide the highest value to our customers through innovative services and superior products. We never compromise on quality and safety.

Our Reasons

Our business is defined by its products and services. Our growth in the Aerospace industry has always depended on quality. As we continue to grow and evolve in markets around the world, we must maintain our high standards.

Our Actions

We created our VITAL operating system to ensure the highest quality of our products and services. In addition, we maintain our commitment to quality when we:

- Ensure an environment that prioritizes quality and consumer safety.
- Report quality and safety concerns immediately.
- Follow all quality control standards and procedures at all times.



Avoiding Bribery and Corruption

Our Beliefs

We win and retain business honestly, fairly, and based on the value we create for our customers. We strive for results without compromising our integrity, and we never offer or accept improper incentives to gain an unfair advantage.

Our Reasons

Corruption has no place at Barnes Aerospace. We do not tolerate it in any form, anywhere we operate. It harms communities and puts our Company and reputation at risk. It can also result in substantial fines and even prison time for the individuals involved. By avoiding corruption, our business is stronger and more sustainable.

Forms of Corruption

A bribe occurs when someone offers or accepts anything of value to improperly influence a decision.

A kickback is the return of anything of value as a reward for fostering business arrangements.

A facilitating, or grease, payment is a payment made to an individual to speed up routine government actions, such as issuing a permit.

Our Actions

We prevent bribery and other forms of corruption when we:

- Choose to earn and do business the right way, aligned with our Values.
- Never offer anything of value to gain a business advantage, including facilitating payments.

- Refuse bribes or kickbacks if they are offered to you.
- Keep accurate and complete financial records.
- Never use a third party to make an improper payment.
- Follow Company policies related to giving and receiving gifts and entertainment.
- Report any incidents in violation of our bribery and corruption standards to the Global Compliance Officer.

Around the World

Barnes Aerospace does business worldwide, and bribery and corruption laws vary from place to place. These laws apply to all Company employees and our business partners in every place we do business. For example, we must follow the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act everywhere we work.

Our Advice

- Q.** I am seeking a permit from a government office. The official told me it is customary to make a payment to speed this process up. May I pay it?
- A.** No. The official has requested what is called a facilitating payment, which is a payment to an individual to speed up routine government actions. Such actions may include issuing a permit or arranging mail pickup. Barnes Aerospace does not allow such payments. Decline to make the payment and report the request to the Legal & Compliance Department.



Giving and Receiving Gifts and Entertainment

Our Beliefs

We take pride in the many business partnerships we have developed over the years. Though we are grateful for these relationships, we do not give or receive inappropriate gifts and entertainment to influence business decisions.

Our Reasons

Exchanging gifts and entertainment with business partners can be a way to foster relationships and build goodwill. However, these exchanges must never influence, or even appear to influence, our business decisions. When we separate acts of goodwill from business decisions, we show our integrity, which leads to a healthier business overall.

Our Actions

Remember that business gifts and entertainment create ethical and legal concerns when they are exchanged with the expectation of something in return. To avoid this problem, we never ask for gifts. If they are offered, we may accept only when they are:

- Not cash or cash equivalents (e.g., gift cards)
- Infrequent and of nominal value only (e.g., business lunch)
- Consistent with both our policy and the business partner's policy
- Not related to any contract or business deal
 - **For example, we do not accept any gifts from a vendor we are evaluating for a contract.**

At times, we may offer gifts and entertainment to business partners. These must also be in accordance with the criteria above. In addition, we accurately document any gifts we give so that the records can be evaluated, if needed.

Our Advice

- Q.** I am involved in a contract negotiation with a potential business partner. One of their representatives offered to buy me lunch. Can I accept the offer?
- A.** It depends. If the lunch is offered in the ordinary course of business, is not lavish or extravagant, and is not provided in exchange for preferential treatment or to influence the negotiations, you may accept it in line with Company policy. However, if the offer could create the appearance of impropriety or influence the negotiation, you should politely decline. When in doubt, consult the Legal & Compliance Department for guidance.

What About Government Employees and Agencies?

Rules on gifts and entertainment are more stringent when it comes to government employees and agencies. Identifying state-owned companies can also be difficult. As a global company with business partners around the world, we must act with extra care. Before giving anything of value to a government employee, or if you are unsure whether a business is state-owned, contact the Legal & Compliance Department for advice.



Competing Fairly

Our Beliefs

Our innovative products and services make us competitive globally. Fair competition strengthens not just our business but the overall quality of business practices in all sectors where we compete. When we compete fairly, everyone wins.

Our Reasons

To stay competitive, we need to stay honest. Integrity and fair play attract and keep customers and business partners. They also ensure that we are always clear-eyed about our strategy and decisions. Our longevity as a company depends on our ability to compete ethically and lawfully.

Our Actions

Laws about fair competition are complex and can vary by country. We follow these laws wherever we do business. Generally, we compete fairly when we:

- Never discuss pricing, bidding processes, or market segmentation with competitors.
- Report any attempts by competitors to have improper discussions or make illegal agreements.
- Never make false claims about competitors' products or interfere with their business.
- Never seek competitive information illegally.
- Never use market strength to stifle competition.

Around the World

Antitrust laws, often known as competition laws outside the United States, are designed to keep competition free and fair. We must maintain our awareness of how these laws can vary in the many countries where we do business. Competing fairly is the right thing to do, and the best thing for our global reputation.

Penalties for violating antitrust and competition laws can lead to stiff fines and even prison time. If you are ever unsure about a situation involving a global competitor, refrain from discussing the topic. Contact the Legal & Compliance Department for guidance.

Trade Associations

Barnes Aerospace may be involved with trade associations, both within the United States and around the world. Trade associations allow industry stakeholders to meet and discuss best practices. They can also present an opportunity to promote our goods and services.

Our competitors may also be part of these trade associations. For this reason, we must maintain our high ethical standards when we participate in these associations. We do not share proprietary, non-public information, and we do not share any price or wage information without prior approval. The Legal & Compliance Department can offer more guidance as needed.



Working with Our Business Partners

Our Beliefs

We strive to conduct our business with integrity, and this extends to our business partners. We choose business partners who both maintain high ethical standards and comply with all applicable laws and regulations. This helps us achieve our goals as a company.

Our Reasons

Our business partners are essential to how we deliver value to our aerospace customers. For our products and services to be of the highest quality, our business partners must share our high standards. All our reputations depend on it.

Our Actions

We always treat our business partners fairly, regardless of the business value or length of the relationship. We also develop strong and ethical business partnerships when we:

- Choose our business partners based on objective criteria, including:
 - **Quality**
 - **Price**
 - **Reliability**
 - **Availability**

- Avoid even the appearance of a conflict of interest, including rejecting gifts that might influence a business decision.
- Never share another company's confidential information, except with permission.
- Communicate and collaborate with business partners to find solutions.
- Ensure our business partners comply with the law and have high ethical standards.

Who Are Our Business Partners?

Barnes Aerospace partners with many businesses, including suppliers, distributors, and sales agents. Suppliers often provide the raw materials we need for our products. Distributors help us bring those products to market. Sales agents help us create business opportunities with new customers. Though our business partners play several roles for us, we expect quality and integrity from them all.

Q&A

- Q.** I met a sales agent who might be able to get customers in a country where we've never done business. Can I talk to this agent on behalf of our Company?
- A.** We have a due diligence process for working with new sales agents. We will need to run a background check on the agent. Contact the Legal & Compliance Department to begin the process. If everything clears, you may pursue an agreement with the agent.



Working with Our Government Customers

Our Beliefs

Our reputation for high-quality, safe products, and services has earned us many customers, including governments. As with all our customers, we are honored and privileged to receive the business. We also embrace the special responsibilities that come with serving government customers.

Our Reasons

Because government customers use public funds to contract businesses, more stringent legal and ethical standards may apply. We are committed to high ethical standards with all our customers, but we know that extra care is called for with our government customers.

A Note on Subcontracting

When we supply products to another business whose end customer is a government, we must treat that

government as our customer as well. We must be aware of how our business partnerships are affected by government contracts to ensure the highest ethical standards.

Our Actions

We meet the special requirements of government customers when we:

- Comply with all relevant procurement laws and policies
- Assure that public funds are used to fully meet commitments.
- Communicate truthfully and fully about:
 - **Selling, marketing, or delivering on a contract**
 - **Tracking costs**
 - **Preparing invoices**
- Never offer anything of value to government officials or employees (see “Avoiding Bribery and Corruption” and “Giving and Receiving Gifts and Entertainment”).



Complying with International Trade Controls

Our Beliefs

Barnes Aerospace has evolved into a global business, and we will continue to do business wherever we can. We comply with all international trade laws when moving products, technology, and services across borders. Our business grows best when it trades in accordance with the law.

Our Reasons

International trade laws are complex and vary from place to place. As a U.S.-based company that imports, exports, sources, and collaborates around the world every day, we are subject to an array of regulations. Violation of any one of these could result in serious penalties and even affect our ability to conduct business globally.

Our Actions

We ensure compliance with international trade controls when we:

- Know the regulations of a country before trading and exchanging technical data across its borders.
- Follow all Company policies related to trade.
- Never do business with entities under U.S. embargo or sanction.

- Conduct due diligence checks with all third parties we wish to do business with.
- Alert the Legal & Compliance Department regarding all boycott requests and trade concerns.

Around the World

Global trade laws extend from products and services to data and software. Customer information and raw materials alike are within the scope of regulations. We must ensure that whatever we import or export is:

- Eligible for import or export (e.g., not private customer data or export-restricted)
- Used for a permissible purpose
- Arrives at a legal destination (e.g., not under embargo)

Each country where we do business will have evolving laws and tariffs. To respond effectively and remain compliant, we need to evolve in response.

Around the World

Though Barnes Aerospace is a global company, we are headquartered in the United States. This means we must follow U.S. laws regarding boycotts outside the United States. Requests to participate in illegal boycotts can be written or verbal, and they may be difficult to identify. We must immediately report all such requests to the Legal & Compliance Department.



Our Commitment to Our Communities

Caring for a *Needy World*
with the things we *throw away*”
- Rev. Wendell Mettey



Velocity. Integrity. Teamwork.

Barnes Aerospace is committed to sustainability initiatives, as well as giving back to our communities.

Preserving and Protecting Our People and Our Environment

Our Beliefs

We value our environment, including the places where we work and live, and we innovate to make our business processes sustainable. Our people and our Company thrive in a healthy environment, and we are responsible for proactively preventing environmental and safety risks, minimizing pollution, and ensuring that our operations protect the well-being of our employees and the communities in which we operate.

Our Reasons

We design processes that sustain natural resources and are committed to corporate responsibility by furthering environmental, social, and governance (ESG) and sustainability principles. This commitment creates value for our stakeholders and is key to our success as a responsible and sustainable organization.

Our Actions

We protect our people and the environment when we:

- Follow all environmental laws and Company policies.

- Manage our chemicals according to best practices and report any leaks or spills of hazardous materials.
- Follow onsite work procedures to meet our annual sustainability goals.
- Keep our facilities energy-efficient by:
 - **Turning off lights when not in use**
 - **Managing the thermostat**
 - **Turning off engines and equipment when not in use**
- Run sustainable businesses that reduce all types of waste and inefficiencies and conserve natural resources to minimize our environmental footprint.

Around the World

The United Nations Global Compact (UNGC) outlines goals for businesses to achieve sustainable practices. We support these principles and are working to align our business with them. We follow environmental laws in all countries where we do business, and we are mapping our vision with global initiatives in mind.



Respecting Human Rights

Our Beliefs

We respect the value and dignity of all human life. We do not tolerate any human rights abuses in any part of our business, anywhere we do business, and we expect the same of our partners.

Our Reasons

Our people are the foundation of our success. Protecting human rights is essential to maintaining trust, ensuring ethical practices, and supporting the long-term health of our business and the communities we serve.

Our Actions

We respect and protect human rights when we:

- Provide safe working conditions and fair compensation for all employees.
- Require our suppliers and other business partners follow fair labor and responsible sourcing practices.
- Never use child labor or forced labor in any form, wherever we do business.
- Report known or potential human rights violations immediately.

Participating in the Political Process

Our Beliefs

We can all make a difference as citizens in our communities, and we all have a right to our beliefs and opinions. However, our time and resources as a company should not be used for personal politics. As a company, we win business when we engage governments with integrity and as one.

Our Reasons

When we participate in politics, we make society fairer and more productive. Our actions as a company must prioritize fairness and productivity as well. Mixing personal politics and our Company's best interests can harm reputations. In addition, we must never seek to influence governments unethically.

Our Actions

We must always take care to separate our individual political views from those of Barnes Aerospace. We participate in personal politics on our own time and with our own money, away from the workplace.

As a company, we participate in politics fairly when we:

- Never make political contributions on behalf of the Company without prior approval.
- Never use Company facilities for fundraising.
- Follow all rules for lobbying, including:
 - **Reporting all Company lobbying expenses**
 - **Only allowing authorized personnel to communicate with government officials**

Our Advice

- Q.** I serve on a committee for an independent political organization. We are trying to raise money, and I think several Barnes Aerospace employees would be interested in contributing. Can I ask co-workers for donations at work?
- A.** No. Personal political activity must be separate from the workplace. We support your rights and enthusiasm as a citizen, but Barnes Aerospace workplaces cannot be sites for fundraising. Co-workers should not feel pressure to support a political cause, especially if they report to you.

Investing in Our Communities

Our Beliefs

Being a good corporate citizen begins with being a great community leader. We are committed to giving back, and we strive to improve our communities through volunteering and charitable contributions.

Our Reasons

As a company with a long history and global reach, we know we can make a difference for the better. Keeping our communities healthy and strong keeps us empowered and competitive. Our people and our communities are the source of our strength as a company.

Our Actions

We best invest in our communities when we:

- Participate in appropriate volunteer and charitable causes.
- Always get approval before donating Company funds with the Barnes Aerospace name.
- Ensure that volunteering does not interfere with work or create a conflict of interest.
- Never pressure others to be involved in a community organization, either through donations or as a volunteer.



Amendments and Waivers of Our Code

This Code applies to all Barnes Aerospace directors, officers, and employees.

In a specific circumstance, Barnes Aerospace may waive a provision of the Code. To seek a waiver, speak with the Legal & Compliance Department. Waiver requests from employees will be directed to the Compliance Committee. Waiver requests from executive officers or directors will be directed to the Board of Directors. The Board of Directors has sole authority to grant waivers of provisions of the Code affecting directors or executive officers.