

# Code of Business Ethics and Conduct Overview



- Barnes Aerospace is committed to following the **highest ethical standards** and doing business lawfully around the world
- Barnes Aerospace sets the expectation that all employees **act with honesty and integrity**
- Our Code **applies to all** Barnes Aerospace employees and officers and unites us across geography and cultures
- The **Code of Business Ethics and Conduct** can be found on our [\*\*Commitment to Governance and Accountability website\*\*](#).

Integrity.

Innovation.

Evolution.

## Introduction to Our Code

### Integrity. Innovation. Evolution.

Consistent with our global presence, the Barnes Code of Business Ethics and Conduct is available in nine languages. It is intended to transcend geography to instill the Barnes Values everywhere we do business. Our Code allows us to extend our traditions of Integrity, Respect, Collaboration, Empowerment, and Determination. Our Code gives us the tools to make something better, to help change the world.

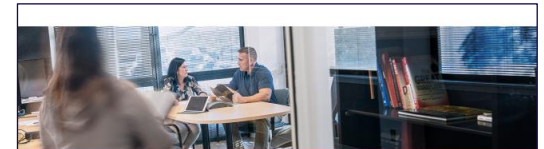


"I've worked at Barnes for 32 years, and Barnes is continually and innovatively giving us everything we need to be successful. You want to do the best job that you can because every one of us is going to sit on an airplane one day. I want to look out on that wing and say I can be proud. I've got parts in that engine, and I know they are right."

Keith Starfield  
Lead CNC Machinist  
Barnes Aerospace

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### Using Our Code

Barnes is committed to following high ethical standards and doing business lawfully around the world. The Barnes 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 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 Legal Services 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 Advice

Q. How do I find the policies referenced in our Code?

A. Corporate policies are posted on BarnesNet under the "Company Resources" heading. If you do not have access to corporate policies on BarnesNet, ask your manager or a Human Resources representative. They can provide a copy of the policy in question.

### Our Responsibilities

Barnes 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
- Complete assigned training on time
- Ask questions if we have any doubts or concerns
- Report 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 and Supervisors

Managers and supervisors have a special responsibility to lead in accordance with Barnes Values and be champions 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 the required training
- Take professional and timely action with respect to questions or concerns
- To not compromise safety or compliance to obtain business results
- To 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

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