



BARNES GROUP INC.

Political Expenditures and Public Policy Matters

As a global provider of highly engineered products, differentiated industrial technologies and innovative solutions, serving a wide range of end markets and customers, Barnes Group 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 Group balances its long-standing policy against political contributions (even when permitted by law) with responsible participation in public policy matters that impact Barnes Group’s business objectives.

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

1. Barnes Group does not have a Political Action Committee (PAC).
2. Barnes Group does not make corporate contributions (either directly or through employee reimbursements) to political candidates, their election campaigns or political parties.
3. Barnes Group 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 Group’s business objectives. The purpose of these groups is to advance the common goals and interests of its members. Barnes Group’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 Group’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 Group property or facility, or the working time of any Barnes Group employee, for any political activity.

The Corporate Governance Committee of our Board of Directors oversees Barnes Group’s practices concerning political expenditures and public policy matters, including Barnes Group’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 Group equipment, supplies, time, or other property, for the purpose of influencing any election, referendum, or ballot initiative.

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