

**GRAHAM CORPORATION**  
**POLITICAL CONTRIBUTION POLICY STATEMENT**

**Adopted: March 25, 2021**

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Graham Corporation does not make independent political expenditures in support of the election or defeat of particular candidates and does not maintain a political action committee. Since we are a for-profit corporation and have contracts with the federal government, by law we are also prohibited from using company money to make these kinds of expenditures.

We have not, and currently do not intend to, endorse any political candidate for federal, state, or local office.

While our employees may participate as individual citizens in the political process, decisions to do so are entirely personal and voluntary. Employees engaging in political campaign activities are expected to do so as private citizens, and must at all times make clear that their views and actions are their own, and not those of Graham Corporation.

While we have not made political contributions to date and have no plans to do so, we reserve the right to make political contributions in the future in accordance with all applicable laws as we may determine is in our best interests and those of our stockholders.