




<b><u>Global Code of Business Conduct</u></b>	<b>Effective Date:</b> September 20, 2021  <b>Approved by:</b>  Charles D. Roberson President & CEO
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## INTRODUCTION

As a global leader within the safety industry, corporate citizenship and integrity are extremely important at Lakeland Industries, Inc. ("Lakeland" or the "Company"). Lakeland has always endeavored to conduct its business in a manner conforming to all applicable laws and regulations, and the highest ethical standards. The Company's reputation for unquestionable integrity is its most valuable asset in its relationships with employees, customers, the communities in which we operate, and shareholders.

Compliance with Lakeland's Global Code of Business Conduct (this "Code") is required of all employees, officers and non-employee directors of Lakeland and its subsidiaries (collectively, "employees"). This Code sets forth Lakeland's expectations of its employees in conducting business internally as well as externally. This Code must be observed by all Lakeland employees, representatives, contractors, vendors, service providers, supply chain partners and business partners throughout the world. Employee compliance with this Code, all applicable laws and all Company policies is the foundation of the Company's reputation globally.

This Code is designed to aid in identifying a wide range of topics that may impact ethics and compliance. It is not intended to cover every potential situation, but it is one of a variety of tools available to employees that can be used to help make ethical decisions and choices. If you should ever face a situation where you are unsure of the right thing to do, consider the following guidance:

- Identify the problem or issue
- Consider the relevant facts and potential impact on the Company and others
- Review and apply this Code
- Review and apply other Company policies and procedures
- Consider any applicable law
- Evaluate options and ask how others might view a chosen action
- Seek assistance from a manager, supervisor, or the Human Resources Department
- Implement the chosen course of action
- Review the impact of the action

Regardless of business circumstances, Lakeland employees must always act ethically, fairly, and honestly.

Violations of this Code, applicable law, or any Company policy may create substantial risk to Lakeland. Accordingly, such violations will result in appropriate disciplinary action, up to and possibly including termination of employment.

### I. LAKELAND AND ITS EMPLOYEES

The Company's reputation for integrity, fairness, and compliance with the law is the responsibility of every employee and depends entirely on our employees. Because the Company's reputation is directly impacted by our employees, Lakeland will treat every employee with the same respect, fairness, and consideration that we require of our employees.

It is every Lakeland employee's responsibility to report potential violations of this Code, applicable law or any Company policy to his or her supervisor, manager, or the Human Resources Department. These managers will ensure that the issue is communicated to the Company's Global Director of Quality and Compliance (the "Compliance Officer") as required by the situation. Employees who report possible violations are protected from retaliation by the Company's "Whistleblower Policy," which prohibits retaliation against you for raising a concern in good faith. Retaliation can take many forms, including, but not limited to, altering job responsibilities and/or compensation/benefits, exclusion from workplace activities and/or meetings, and other types of behavior. Furthermore, the Company will ensure that any employee who engages in, or attempts to engage in, retaliation against a reporting employee will face appropriate disciplinary action up to and including termination.

Employees are encouraged and expected to report potential violations of this Code, examples of which are below:

- Conflicts of interest or potential conflicts of interest
- Questionable gifts or gratuities
- Improper or questionable accounting practices
- Fraud or theft
- Questionable workplace health and safety practices
- Threats of violence
- Workplace harassment
- Discrimination
- Suspected bribery or corrupt business practices
- Export or trade sanctions compliance matters
- Antitrust compliance matters (competition law)
- Product quality or safety concerns
- Environmental compliance matters
- Retaliation
- Legal or ethical concerns with third parties
- Other potential unethical or illegal conduct

## **II. LAKELAND AND THE WORKPLACE**

Lakeland is committed to providing our employees, customers and suppliers with a workplace that promotes dignity and respect and is free from discrimination, harassment, and bullying. Our people are a key to the Company's success and perform best when they are treated respectfully. As a result, Lakeland will not tolerate any form of discrimination or harassment in the workplace and will address any such acts appropriately. More information regarding the Company's commitment to its employees and the employees of its supply chain and business partners can be found in the Company's "Global Human Rights Policy." Please note that while this section primarily addresses U.S. law, Lakeland expects its employees and partners located or conducting business outside of the U.S. to comply with the laws of such foreign jurisdiction(s), and with U.S. laws to the extent that they are more stringent than the laws of such foreign jurisdiction(s).

### **A. Harassment and Bullying**

Lakeland strictly prohibits and does not tolerate unlawful harassment against employees or any other covered persons because of race, religion, national origin, sex, pregnancy, gender, age, physical or mental disability, citizenship, genetic information, past, current or prospective service in the uniformed services, or any other characteristic protected under applicable federal, state, or local law. Examples of harassment include, but are not limited to:

- Name Calling
- Epithets

- Slurs
- Inappropriate jokes
- Repeated and/or unwanted flirtations
- Displaying, discussing, or referencing content of a sexual nature
- Threatening statements
- Intimidating remarks

Bullying is repeated inappropriate behavior whether verbal, physical, psychological or otherwise that interferes with another's work, that a reasonable person would find offensive, threatening, or humiliating. Not all bullying may constitute workplace harassment, however in such cases, bullying will still be deemed to violate this Code and appropriate disciplinary action will be taken.

## **B. Sexual Harassment**

All Lakeland employees are prohibited from harassing employees and other covered persons based on that individual's sex or gender and regardless of the harasser's sex or gender. Sexual harassment means any harassment based on someone's sex or gender. It includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as any unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature, when any of the following is true:

- Submission to the advance, request or conduct is made either explicitly or implicitly a term or condition of employment;
- Submission to or rejection of the advance, request or conduct is used as a basis for employment decisions; or
- Such advances, requests or conduct have the purpose or effect of substantially or unreasonably interfering with an employee's work performance by creating an intimidating, hostile or offensive work environment.

Lakeland will not tolerate any form of sexual harassment, regardless of whether it is:

- Verbal (for example, epithets, derogatory statements, slurs, sexually-related comments or jokes, unwelcome sexual advances or requests for sexual favors);
- Physical (for example, assault or inappropriate physical contact);
- Visual (for example, displaying sexually suggestive posters cartoons or drawings, sending inappropriate adult-themed gifts, leering or making sexual gestures); or
- Online (for example, derogatory statements or sexually suggestive postings in any social media platform including Facebook, Twitter, Instagram, Snapchat, etc.).

This list is illustrative only, and not exhaustive. No form of sexual harassment will be tolerated. Harassment is prohibited both at the workplace and at employer-sponsored events.

## **C. Other Types of Harassment**

Lakeland's anti-harassment policy applies equally to harassment based on an employee's race, religion, national origin, age, physical or mental disability, citizenship, genetic information, past, present or prospective service in the uniformed services, or any other characteristic protected under applicable federal, state, or local law.

Such harassment often takes a similar form to sexual harassment and includes harassment that is:

- Verbal (for example, epithets, derogatory statements, slurs, derogatory comments or jokes);
- Physical (for example, assault or inappropriate physical contact);
- Visual (for example, displaying derogatory posters, cartoons, drawings or making derogatory gestures); or

- Online (for example, derogatory statements or sexually suggestive postings in any social media platform including Facebook, Twitter, Instagram, Snapchat, etc.).

This list is illustrative only, and not exhaustive. No form of harassment will be tolerated. Harassment is prohibited both at the workplace and at employer-sponsored events.

#### **D. Complaint Procedures**

If you are subjected to any conduct that you believe violates this policy or witness any such conduct, you must promptly speak to, write or otherwise contact a manager or supervisor or the Human Resources Department or, if the conduct involves your direct supervisor, the next level above your direct supervisor, ideally within five (5) days of the offending conduct. If you have not received a satisfactory response within five (5) days after reporting any incident of what you perceive to be harassment, please immediately contact the Human Resources Department or the Compliance Officer.

Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses. Lakeland will directly and thoroughly investigate the facts and circumstances of all claims of perceived harassment and will take prompt corrective action, if appropriate.

Additionally, any manager or supervisor who observes harassing conduct must report the conduct to the Human Resources Department so that an investigation can be made and corrective action taken, if appropriate.

#### **E. No Retaliation**

No one will be subject to, and Lakeland prohibits, any form of discipline, reprisal, intimidation or retaliation for good faith reporting of incidents of harassment of any kind, pursuing any harassment claim or cooperating in related investigations.

Lakeland is committed to enforcing this policy against all forms of harassment. However, the effectiveness of our efforts depends largely on employees telling us about inappropriate workplace conduct. If employees feel that they or someone else may have been subjected to conduct that violates this policy, they should report it immediately. If employees do not report harassing conduct, Lakeland may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action.

#### **F. Violations of This Policy**

Any employee, regardless of position or title, whom Lakeland determines has subjected an individual to harassment or retaliation in violation of this policy, will be subject to discipline, up to and including termination of employment.

#### **G. Fair Treatment and Diversity**

As a multinational company, Lakeland fully recognizes the importance of diversity in the workplace. Our employees, regardless of where they are located in the world, make the Company successful and we celebrate the cultures in all of the communities in which we operate. Accordingly, Lakeland, its senior management and board of directors promote diversity of thought, differing perspectives, and fair treatment for all employees and applicants, as well as for senior management and the board of directors. We do not discriminate based on age, color, creed, ethnicity, disability, nationality, race, religion, gender, gender identity, gender expression, sexual orientation, or any other classifications that are protected under applicable law.

Fair treatment relates to all phases of employment at Lakeland. It is essential in hiring, promotion, termination, determination of wages and benefits, training, distribution of benefits (i.e. education reimbursement) and in reductions in force (layoffs).

It is Lakeland's policy to:

- Choose its employees on the basis of their ability to perform the work for which they are hired without regard to race, religion, sex, age, national origin, or other factors protected by law;
- Offer employees a safe, healthy, and clean work environment;
- Offer work that challenges the employees and gives them a feeling of satisfaction; and
- Pay employees fairly in relation to their contributions to the Company, within the boundaries of current standards.

## **H. Health and Safety**

Lakeland's tag line is "Protect Your People." While there is no question that Lakeland products facilitate this for our customers every day, we must remember that this imperative begins with our own actions in the workplace. We are committed to ensuring the health and safety of our employees, our employees' families, and the communities in which we operate. Each Lakeland facility around the globe will maintain practices and policies for workplace safety. It is the responsibility of each Lakeland employee to take personal responsibility for safety and to comply with all safety policies and practices. Should you encounter what you believe to be an unsafe work environment, you are expected to report it to your supervisor, manager, or the Human Resources Department.

This is not just a workplace compliance issue. As leaders in the safety industry, it is incumbent upon us to set a high standard for safety that our customers should aspire to. This is leadership by example, and it is as important within the safety industry as it is within our Company.

More information can be found in the Company's "Global Workplace Health and Safety Policy."

Substance abuse represents a threat to the well-being of our employees, the quality of our products and ultimately the well-being of our customers. For this reason, as well as others, substance abuse will not be tolerated at Lakeland. Employees are not to report to work, operate equipment, drive company vehicles or vehicles rented on company travel while under the influence of alcohol or drugs. To ensure a workplace free from substance abuse, drug testing is a requirement of our hiring process and employees are advised that workplace accidents may result in drug testing.

Lakeland's policies regarding drug testing can be found in the employee handbook.

## **I. Confidentiality**

In the course of work at Lakeland, you will often be entrusted with confidential information regarding the Company. This is non-public information that may be of benefit to our competitors or others were they to have such information

Examples of confidential information regarding the Company include:

- R&D projects
- Product design
- Product composition
- Suppliers
- Customers
- Marketing strategies
- Pricing
- Personal data of employees
- Unpublished financial results
- Corporate investigations
- Cybersecurity systems

- Passwords
- Other items of similar nature

It is the responsibility of each employee to prevent unauthorized access to this information and to never share this information improperly. It is the responsibility of each employee to exercise proper care of Company equipment to ensure that it remains secure. Loss or theft of Company devices like laptops and smart phones represents a significant risk to confidential information and the security of Lakeland systems. Should you lose, misplace, or have a device stolen, it must be reported immediately to the Information Technology Department so that the information on the device can be secured or destroyed and the device can be deactivated.

Lakeland values its position in the marketplace and its reputation with the community. We seek to be forthcoming in all of our interactions with the public. For this reason, and because of confidentiality concerns, Lakeland employees are not to speak to the press or represent themselves as agents of Lakeland without authorization from the Human Resources Department or the Compliance Officer.

### **III. LAKELAND AND THE COMMUNITY**

The Company shall conduct its business in a manner that is socially responsible. In addition to manufacturing and selling products, it shall protect the quality of the environment and endeavor to conserve energy and other valuable resources. More information regarding the Company's commitments to conducting business in an environmentally sustainable manner that protects our natural resources and the environment and is in compliance with all applicable environmental, health and safety obligations can be found in the Company's "Global Environmental Policy".

Each of the Company's facilities is expected to make every effort to be an integral part of the community in which it operates, and to participate in its activities as a concerned and responsible citizen.

The Company recognizes that employee participation in cultural, social and volunteer organizations benefits not only the Company but also the communities in which the Company operates, and all employees are encouraged to participate in public activities of their individual choice.

### **IV. LAKELAND AND OUR BUSINESS PARTNERS**

Lakeland's business partners include customers, distributors, third-party representatives or agents, service providers and vendors. Our employees work with our business partners on a daily basis. This section covers topics that may arise when dealing with our business partners and establishes the Company's expectations relating to those interactions.

#### **A. Conflicts of Interest**

Each employee is expected to act in a manner that promotes the Company's best interests. Personal or professional relationships with our business partners, government personnel, or others must not be allowed to cloud judgement or the ability to act in the best interests of Lakeland. Relationships with our business partners must not be allowed to develop into a conflict of interest or appearance of impropriety that may reflect poorly on you or the Company.

Conflicts of interest exist when sound business judgement, which places Lakeland's interests first, is clouded by a personal interest in the transaction that prevents objectivity, influences judgement, or compromises loyalty to the Company. Not only must conflicts of interest be avoided, but so must the appearance of a conflict of interest. Both can be equally damaging to the reputation of the individual(s) involved and the Company. A good way to evaluate questionable situations is to ask how others might view your actions, or would you be comfortable with your actions being widely known. If the answer to either question requires secrecy then the possibility of a conflict of interest exists and you should seek further guidance.

The best way to avoid conflicts of interest or the appearance of a conflict of interest is to disclose any unusual or questionable conduct in advance to a supervisor or manager or the Human Resources Department and remove yourself from all business dealings between Lakeland and the business partner in question. All Lakeland employees are required to fully disclose any potential or actual conflicts of interest prior to engaging in the conduct or transaction. If uncertainty exists, it is best to disclose the potential conflict.

Examples of conflicts of interest that are never permitted include:

- Giving or receiving improper or unusual gifts, gratuities, or honorarium
- Involving family members in business transactions with the Company
- Accepting personal transactions with Lakeland business partners on terms more favorable than those available to other parties
- Holding a material financial interest in a company doing business with Lakeland
- Holding a substantial financial interest in a competing business

## **B. Concurrent Employment**

Some employees may wish to work jobs outside of the Company. We call this “concurrent employment.” Concurrent employment arrangements may include maintaining a second job, receiving compensation for public speaking or presentations, serving as a subject matter expert, engaging in compensated peer reviews, or consulting. These arrangements run the risk of creating conflicts of interest or may cause obstacles to the employee’s objectivity in decision making. In the case of managers, senior managers and executives, employment by Lakeland is usually exclusive, and any concurrent employment must be approved by the Compliance Officer or the Board of Directors. All questions regarding concurrent employment should be directed to the Human Resources Department.

## **C. Bribery and Corruption**

Lakeland has strict policies prohibiting employees or business associates from engaging in bribery or corruption. Additionally, as a multi-national company with operations in the U.S. and the U.K., Lakeland must comply with the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act. Additionally, bribery and corrupt practices are illegal in most countries throughout the world.

The U.S. FCPA and the U.K. Bribery Act both strictly prohibit companies and their affiliates or subsidiaries from engaging in corrupt business practices. These, as well as other laws, are strictly enforced with harsh penalties ranging from fines to loss of trade licenses for companies and fines to imprisonment for individuals.

These laws and Company policy prohibit our employees from giving, authorizing, or promising anything of value to any person in order to gain an improper advantage, or influence a person’s decision making to favor Lakeland. The use of third parties to engage in any acts that would be illegal for Lakeland or an employee of Lakeland to engage in is also prohibited. Lakeland and its employees may also be held responsible for the actions of our business partners should we have reasonably known that they were engaging in these activities. “Self-blinding” or turning a blind eye to the actions of our business partners is not a defense. For this reason, all Lakeland employees must remain vigilant and report any potential corruption.

The Company will provide annual training to key personnel that will educate them on “red flags” that may indicate corrupt practices or bribery. This training will be given to personnel whose professional responsibilities or jobs place them in key positions to spot “red flags” or whose jobs may place them in positions where they may encounter corrupt practices or bribery. It is the responsibility of all employees to report any “red flags” or potentially compromising events that they may encounter. Reports should be made to a supervisor or manager or the Human Resources Department.

Not only does Lakeland policy prohibit bribery and corrupt practices with regards to public officials, business partners, or customers, it also prohibits the acceptance of bribes by Lakeland employees. Often times, these improper payments are disguised in the form of gifts, gratuities, or honorariums. Whether or not these “gifts” are appropriate, of proper value, or customary is key to whether or not they may be considered bribes. Gifts are covered in more detail below.

Lakeland employees are not to engage in any of the following activities without prior approval of the Compliance Officer:

- Pay for travel or lodging for a government official
- Make political campaign contributions on behalf of Lakeland
- Provide loans to business partners or government officials
- Donate to charities on behalf of Lakeland
- Make cash gifts or the equivalent

#### **D. Gifts and Entertainment**

Giving and receiving gifts is common practice in many industries, cultures and businesses. These gifts and entertainment are a valuable way to demonstrate appreciation, and how we value a relationship. However, use of such gifts to influence the decision-making process of our business partners by offering extravagant or improper gifts or entertainment is wrong and may be construed as bribery. Similarly, Lakeland employees should not accept extravagant or improper gifts that could be viewed as sufficient to influence their decision making. The following principles should be kept in mind when giving or receiving gifts:

- Is the gift or entertainment being given or received customary, infrequent, and of appropriate monetary value?
- Will the gift or entertainment being given or received appear to obligate the recipient to take a certain action or prevent them from acting in the best interests of their own organization?
- Gifts or entertainment provided to family members or spouses of business partners is regarded as a business gift and is therefore subject to this Code.
- Gifts of cash, gift cards, or equivalent are not appropriate business gifts and are not permitted by Lakeland without approval of the Compliance Officer.

#### **E. Loans**

Loans often create the potential for a conflict of interest or the appearance of a conflict of interest. For this reason, Lakeland employees are prohibited from lending money to our business partners, their representatives, or anyone with whom we may have business dealings.

Just as lending money creates a potential conflict of interest, so does borrowing money. Therefore, Lakeland employees and their family members may not borrow money from our business partners, their representatives, or anyone doing business with Lakeland. This prohibition does not apply to banks, savings and loans, credit unions or other companies engaged in dealing in consumer loans as a regular part of their business, provided that the terms and conditions of the loan are consistent with market rates.

### **V. LAKELAND AND OUR SHAREHOLDERS**

Lakeland Industries, Inc. is a publicly traded company (NASDAQ: LAKE). This means that shares of Lakeland are owned by individual shareholders and virtually anyone can purchase our stock on the NASDAQ. Our shareholders place a great deal of trust in our business and how we manage it when they invest their money in Lakeland. They purchase our shares with the anticipation that we will grow the Company, manage it well, and provide them with accurate and timely reporting of our financials and other activities. They in turn use this information to make informed decisions about their investments in Lakeland. This section will discuss how this Code and our integrity are important to our shareholders. If you suspect a violation of this section of this Code, you must report the matter to a manager or supervisor or the Human



Resources Department. You may also refer to the reporting channels set forth in the Company's "Whistleblower Policy."

### **A. Financial Records Accuracy**

Our shareholders, business partners, and customers depend on the accuracy of our financial information and record keeping to make informed decisions. Additionally, government regulations and rules also require a great deal of precision and accuracy in reporting company performance. For these reasons, it is imperative that each Lakeland employee be responsible for ensuring that the information they provide is an accurate and fair representation of all business transactions and related information. Accuracy of our financial information and reporting is ensured by following established accounting policies and procedures and submitting data in a timely manner. No false, misleading, distorted, or vague entries will be accepted in Company books and records.

It is important to understand that records such as expense reports, invoices, purchase orders, and contracts are all considered supporting financial records and are therefore subject to the same requirements for accuracy and precision. When preparing these documents employees must not withhold or misrepresent information.

### **B. Fair Disclosure and Fraud**

All Lakeland employees are required to provide full, fair, accurate and understandable disclosures in all reports and documents submitted to government agencies, or anyone outside or within Lakeland. Any intentional act to falsify, mislead, distort or conceal the nature of any transactions or facts whether illegal or not; of a material nature or not, is a violation of this Code and will be handled accordingly.

### **C. Insider Trading**

Lakeland stock is traded on the NASDAQ on a daily basis and most people are free to trade in our stock at will. Maintaining the confidence of our shareholders and the public trading markets is critical to our continued success. For this reason, there are specific regulations and Company policies that apply to Lakeland employees who may wish to trade in Lakeland stock. As employees of the Company, you may come into possession of important business information that is not known to the investing public. This is often referred to as "material non-public information." Briefly stated, this is information that has not been disclosed to the public that a reasonable investor would consider important in making decisions as to whether or not to buy, hold, or sell Lakeland stock. Employees in possession of material non-public information are prohibited from using or sharing the information with others for stock trading purposes. The use of such information for personal gain (profit) or to "tip" others who might seek to profit from the information is unethical and therefore a violation of this Code, against Company policy (see the Company's "Policy on Insider Trading"), and illegal. The consequences of such actions to the Company and to individuals involved can be severe, including fines and imprisonment.

Examples of material non-public information include:

- Unpublished financial results or estimates
- Financial performance targets or goals
- Information relating to potential mergers or acquisitions
- Award or loss of large contracts
- Pending organizational changes
- Undisclosed investigations
- Undisclosed security breaches
- Other items that may impact Lakeland's stock price

Lakeland maintains a list of "insiders" who must seek approval to trade in Company stock prior to trading. This process is covered in detail in the Company's "Policy on Insider Trading." However, any employee

who is in possession of material non-public information is prohibited from trading without approval under the "Insider Trading Policy". Employees are further advised that there are blackout periods on trading and other limitations as to frequency of trading and the kinds of trades (buying and selling) that employees may engage in.

For these reasons, it is recommended that any Lakeland employee seek approval before trading in Lakeland stock regardless of whether or not they are identified as an "insider." The process for seeking approval is outlined in the Company's "Policy on Insider Trading."

#### **D. Protection of Company Assets**

As an employee of Lakeland, you may be entrusted with numerous Company assets of varying values. The term "assets" refers to financial assets such as bank accounts and credit lines, computers, vehicles, inventory, supplies, materials handling equipment, production equipment, lab equipment, intellectual property, and trade secrets. Employees are required to exercise reasonable care and caution to safeguard the assets entrusted to them to prevent loss, misuse, damage, or theft. These assets belong to the Company and ultimately our shareholders.

Company assets are never to be used to benefit interests outside of those of Lakeland. Abuse, theft, fraud, embezzlement, or disclosure (in the case of intellectual property or trade secrets) of Company assets is prohibited. Furthermore, it is required that all employees entrusted with Company assets be aware of and in compliance with Company policies relating to operation, use, care, and licensing of the asset.

#### **E. Audits**

Lakeland regularly engages in internal and external auditing by government agencies, tax authorities, customs and in some cases our customers. Auditing is used to verify and validate the accuracy of, and compliance with, processes, procedures, and accounting principles. Internally, we maintain a robust auditing program that engages every geographic region, manufacturing and sales operation, department, and service within the Company. All Lakeland employees are expected to support and cooperate with our auditors, whether internal or external. All information disclosed to auditors must be complete, accurate, and in accordance with applicable law, the disclosure requirements outlined in this Code and related Company policies.

The decision to retain, hire, or allow an external auditor or financial services firm to perform any work for Lakeland rests exclusively with the Chief Financial Officer (CFO). Any requests for such services require the CFO's prior approval and contract review.

### **VI. LAKELAND CUSTOMERS AND COMMUNITIES**

#### **A. Export of Products and Technologies**

Transactions with foreign countries and specific parties and intermediaries are governed by a number of U.S. laws. These laws apply to U.S. operations, U.S. citizens (wherever they are), products manufactured using U.S. origin parts or technology, and products transiting the U.S. Additionally, many countries also have their own similar export/import control regulations.

U.S. Export Control Regulations contained in Export Administration Regulations (EAR) require that an export license be obtained for certain Lakeland products before they can be exported, re-exported, or otherwise transferred outside of the U.S. It is important to note that exports are not limited to products or services only. A "deemed export" takes place when U.S. products or technology are transferred to non-U.S. nationals while they are inside the U.S. The consequences for exportation of goods in violation of U.S. laws are severe.

While Lakeland has export control processes and procedures in place to control our exports and imports and ensure compliance with U.S. and other applicable trade laws, Company employees should contact

Global Logistics if they have any questions or concerns regarding the export or import of a specific product and whether or not licensing, other documentation or reporting is required.

## **B. Sanctioned and Embargoed Countries, Individuals, and Entities**

The U.S. Government maintains lists of countries, individuals, and entities that are subject to various sanctions or embargoes (collectively, "Sanctions"). Absent appropriate governmental approval, it is unlawful to engage, directly or indirectly through a third party, in a "transaction" with any individual or entity subject to a U.S. Sanctions program; violations carry the potential for significant criminal and civil penalties even, in the latter case, when the violation is inadvertent. What constitutes a "transaction" can vary depending on the particular Sanctions program at issue, but it generally is seen to include business dealings such as buying and selling goods, giving or receiving money, and investment activity.

There are two primary kinds of U.S. Sanctions programs:

- Programs that generally prohibit U.S. persons from engaging in transactions with individuals or entities located within certain countries (e.g., Cuba, Iran, North Korea, Syria, Crimea Region of Ukraine); and
- Programs that generally prohibit U.S. persons from engaging in transactions with specifically identified individuals or entities – regardless of where they are located – due to their involvement in activities deemed contrary to U.S. foreign policy or security.

Any Lakeland employee who has knowledge or suspicion of any transaction or potential transaction that may be in violation of Sanctions laws or Company policy must report it promptly to the Human Resources Department or the Compliance Officer.

## **C. Advertising**

Lakeland is a global leader within the protective clothing market for a number of reasons, but most important is that our customers and stakeholders trust us to act with integrity and consistently provide high-quality products, accurate information, and honest answers to questions. We earn this reputation every day and it is a primary point of differentiation between Lakeland and our competitors. Our reputation for honesty and integrity is put on display through our advertising and promotions. For these reasons, Lakeland will not tolerate deceptive, misleading, or false advertising or promotional material.

## **D. Antitrust and Fair Competition**

In its relationships with its competitors, the Company and its employees will fully understand and strictly adhere to the requirements of the antitrust laws. These laws, which, in the United States, include the Sherman Act, Clayton Act, Robinson-Patman Act, and Federal Trade Commission Act, seek to advance and maintain the free enterprise system and take precedence over any business objective of the Company, notwithstanding any resulting increases in sales or profits.

Lakeland intends to follow these laws, and therefore, when conducting Company business: never discuss pricing, production, or markets with competitors; never set resale prices with customers or suppliers; never agree with competitors to boycott a particular customer or supplier; never induce a third party to breach an existing agreement; and never act in a manner that could be seen as an attempt to exclude present or potential competitors or to control market prices. Keep in mind that agreements do not have to be signed contracts to violate competition laws. An informal understanding between you and a competitor, or even a conversation that implies an understanding, may be a problem. If any of these topics come up while you are talking with a competitor, stop the conversation immediately and consult a manager or supervisor or the Human Resources Department. The Company will not condone any actions which an employee knew or should have known would violate the antitrust laws or any other valid law or regulation.

## VII. LAKELAND AND THE LAW

It is the Company's policy to comply fully with all applicable laws and regulations in the various communities, states and countries in which it operates and to conduct its affairs in keeping with the highest moral, legal and ethical standards. As a U.S. based company, Lakeland has operations and offices across the globe. As a result, compliance with "all applicable laws" requires us to not only comply with U.S. law, but also with the laws that apply to our operations in all of the countries in which we conduct business.

The laws with which we must comply cover various topics including, but not limited to, financial reporting, bribery and corrupt practices, insider trading, import and export regulations and laws, competition (antitrust), workplace health and safety, environmental compliance and reporting, labor, and others.

It is not expected that every employee will have full knowledge of the laws affecting his or her responsibilities. Lakeland maintains a substantial number of global policies that relate to these laws and others. More commonly encountered laws are addressed in more detail within this Code.

The Company expects employees with significant responsibilities (managers) will have a general knowledge of local applicable laws and prohibited activities relating to their work and will seek guidance on any matter on which there is a question, either directly from the Company's legal department or through their supervisors.

The Company's directors, executives, management, and employees are committed to a global policy of complying with all local and regional laws relating to employment, working hours, holiday entitlements, equality and discrimination, and related labor policies. The Company does not and will not employ any person under the age of sixteen (16), in any capacity, in any Company facility, and requires the same of the Company's contractors and suppliers. The Company will not, under any circumstance, tolerate human trafficking, the use of slave labor, child labor, involuntary labor or forced labor, or any other violations of human rights, and will not conduct business with supply chain partners or business partners who engage in such practices. Local managers are expected to ensure processes are in place to ensure compliance with this policy. More information regarding the Company's efforts and preventative actions to eliminate modern slavery and human trafficking can be found in the Company's "Statement on Modern Slavery and Human Trafficking."

As a leader in the safety industry, the Company is committed to complying with all local health and safety regulations in all of its facilities and striving to ensure that all of the Company's employees, and those of its contractors and suppliers, are provided with a safe and healthy working environment, free from any form of discrimination and harassment on the grounds of sex, race, religion or any other protected characteristic. See the Company's "Supplier Code of Conduct" for more information regarding the Company's expectations for supplier conduct relating to integrity and business ethics, safety, human rights and labor laws, environmental practices, confidentiality, and other management practices.

As set forth in the Company's "Global Policy on Conflict Minerals," the Company supports the efforts of the U.S., E.U., and other governments around the world to end human rights abuses associated with continuing violent conflicts that may be funded through the sale of certain minerals. Lakeland is committed to ensuring that our supply chain partners are compliant with all applicable "Conflict Minerals" disclosures and that they use products do not contain minerals that directly or indirectly finance or benefit armed groups in certain countries.

Honesty is not subject to equivocation at any time in any culture, and even where the law may be permissive, your Company chooses to follow the course of highest integrity. The reputation of the Company for scrupulous dealing is a priceless asset, just as it is for individuals. The intent of these principles is to maintain and develop the Company's reputation in the future as it has in the past.

## **VIII. ADDITIONAL OBLIGATIONS FOR MANAGERS**

Every Lakeland manager will lead by example and demonstrate their commitment to this Code through their actions on a daily basis. Furthermore, every manager is responsible for maintaining a work environment that encourages, reinforces and promotes ethical conduct and compliance with this Code and applicable law. Managers will maintain an open-door policy for employees under their supervision to provide opportunity to raise questions or concerns relating to this Code, ethics, policies, or other issues that may arise. Managers will also monitor compliance with this Code and policies within their areas of responsibility. This oversight will require managers to pay attention to their work environment and understand the decisions and conduct occurring within and around them.

Finally, managers are to ensure that any ethics or compliance related concerns are brought to their attention and promptly forwarded to the Compliance Officer. This means that any matter brought to a manager's attention, by an employee, which the manager believes involves or may involve a possible violation of this Code, applicable law, or any Company policy must be promptly passed on to the Compliance Officer. It also means, pursuant to the Company's "Whistleblower Policy," that a manager must never retaliate or permit retaliation against an employee who has raised a concern in good faith.

### **Certification and Acknowledgement**

I, \_\_\_\_\_, hereby certify that I have reviewed, understand and will comply with Lakeland Industries, Inc.'s Global Code of Business Conduct (the "Code"). I understand and agree that any violation of this Code or the policies contained therein may result in disciplinary action, up to and including termination of my employment and/or any other association with Lakeland.

Name (Signature): \_\_\_\_\_

Name (Print): \_\_\_\_\_

Date: \_\_\_\_\_