

Global Policy on Conflict Minerals

Effective Date:
September 20, 2021

Approved by:



Charles D. Roberson
President & CEO

Objective

Consistent with the Global Human Rights Policy of Lakeland Industries, Inc. ("Lakeland"), Lakeland 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. "Conflict Minerals" generally refers to the minerals cassiterite, columbite-tantalite (coltan), wolframite and gold (including their derivatives, such as tantalum, tin, and tungsten), and any other minerals that the U.S. Secretary of State may designate as sourced from the Democratic Republic of the Congo (the "DRC") or any adjoining country (collectively with the DRC, the "Covered Countries"), but a broader definition can be applied to any mineral supply chains originating from conflict-affected areas of the world. Lakeland firmly believes that our customers should be fully informed about the products they purchase. Lakeland is committed to ensuring that our supply chain partners are compliant with all applicable Conflict Minerals disclosures and that they use products that are "DRC conflict-free," meaning that their products do not contain minerals that directly or indirectly finance or benefit armed groups in the Covered Countries.

Scope

As used in this Global Policy on Conflict Minerals (this "Policy"), "Lakeland" includes Lakeland Industries, Inc. and each of its global subsidiaries and affiliated companies.

Policy

1. Lakeland requires that all raw materials be sourced responsibly and in accordance with Lakeland policies, which includes the sourcing of any products that may contain or utilize Conflict Minerals in their production.
2. While Lakeland's supply chain is complex, the composition of some raw materials is proprietary, and all the components used to make the raw materials that we use may not be known. Lakeland requires that all suppliers and supply chain partners work with us to:
 - a. Provide information to conduct due diligence in order to document our compliance with the disclosure requirements in applicable laws with regards to Conflict Minerals; and
 - b. Practice responsible sourcing of raw materials and constituent components to assure that all Conflict Minerals sourced are DRC conflict-free and do not directly or indirectly finance armed conflict in the Covered Countries.
3. Lakeland expects the following of our suppliers:
 - a. Suppliers and supply chain partners shall not supply Lakeland with any Conflict Minerals.
 - b. Suppliers and supply chain partners shall develop and put in place policies, procedures, and management processes to prevent the entry of Conflict Minerals into the supply chain and provide the necessary transparency as to origin to confirm DRC conflict-free classification of any minerals that may be used in Lakeland's supply chain.
 - c. Suppliers and supply chain partners shall provide Lakeland with documentation and accurate information as to the source of any minerals which could be Conflict Minerals within the supply

chain and the steps undertaken to obtain that verification. Such verification should include recognized, independent, third party verification.

- d. Suppliers and supply chain partners shall immediately advise Lakeland if it is determined that any materials in the supply chain contain minerals that are not DRC conflict-free.
4. Suppliers and supply chain partners who are not in compliance with Conflict Minerals regulations and will not work to develop the due diligence processes, management procedures, and proper documentation as to the source of materials will be excluded from conducting future business with Lakeland.

Administration of the Policy

1. Lakeland will develop, implement, and communicate the management processes and procedures required to comply with this Policy. This Policy and any related processes and procedures will be reviewed at regular intervals by Lakeland's senior management for adjustment and/or improvement.
2. Lakeland will periodically provide training to all employees with responsibilities that impact this Policy and also communicate these expectations to suppliers and supply chain partners.
3. Lakeland will continually monitor, evaluate, and enhance this Policy.
4. Based on risk assessment or other factors, Lakeland reserves the right to notify its suppliers and supply chain partners of the Company's intention to conduct an audit on such party's compliance with this Policy. If a supplier or supply chain partner fails to comply with this Policy, or if we determine that their efforts are deficient, Lakeland's Global Director of Quality and Compliance ("Lakeland's Compliance Officer") will review the findings to determine the course of action to be taken. Lakeland may decide to suspend conduct of business with such supplier or supply chain partner until the deficiency is remediated; work with the supplier or supply chain partner to remediate the deficiency as part of longer-term plan, or discontinue conducting business with the supplier or supply chain partner.
5. This Policy is administered internally by Lakeland's Human Resources Department and by Lakeland's Compliance Officer for supplier and supply chain partner compliance. Any questions regarding this Policy should be directed accordingly. Concerns regarding this Policy and any knowledge or suspicion of a violation of this Policy shall be reported to Lakeland's Compliance Officer. Suppliers and supply chain partners may also refer to the reporting channels set forth in the Company's "Whistleblower Policy" which can be found at www.lakeland.com/.