



Protect Your People®

Supplier Code of Conduct

Effective Date:
September 20, 2021

Approved by:

Charles D. Roberson
President & CEO

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. We extend our value for integrity and our culture of safety and corporate citizenship to our suppliers throughout the world.

This Supplier Code of Conduct (this "Supplier Code") sets forth Lakeland's minimum expectations for supplier conduct relating to integrity and business ethics, safety, human rights and labor laws, environmental practices, confidentiality, and other management practices. This Supplier Code details the obligations that Lakeland places on its suppliers. As used in this Supplier Code, "Lakeland" and the "Company" include Lakeland Industries, Inc. and each of its global subsidiaries and affiliates.

I. LEGAL COMPLIANCE

A. Compliance with Laws, Regulations, and Lakeland Policies

Suppliers to Lakeland are required to comply with all applicable laws, regulations and Lakeland policies in all circumstances, without exception. Suppliers are further responsible for ensuring that any subcontractors that they use are in compliance with all applicable laws, regulations and Lakeland policies, including, but not limited to, this Supplier Code.

Violations of this Supplier Code or an applicable law, regulation or Lakeland policy can create substantial risk to Lakeland, our employees, customers and suppliers, and the communities in which we operate. For this reason, such a violation will result in Lakeland taking appropriate action, up to and including suspension or termination of business activities with such supplier.

B. Import/Export Requirements

Lakeland suppliers must comply with all applicable United States, state, local and international trade laws, including, but not limited to, sanctions, embargoes, and other restrictions. 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 U.S. sanctions or embargoes (collectively, "Sanctions"); 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.

Suppliers to Lakeland must have adequate and appropriate import/export control processes, technologies and services in place and, if applicable, must acquire and maintain all required licenses for the importation, exportation, and/or transfer of its products. For all goods supplied to Lakeland, suppliers will provide the information necessary for Lakeland's future resale, importation, exportation, and/or transfer of products, including, but not limited to:

- Country of Origin Certification
- Commodity code (e.g. tariff code)
- Corresponding Lakeland part number for each product supplied

Suppliers must follow all applicable laws and regulations with respect to restricted business zones and countries. Lakeland will not do business with suppliers who support the boycott of trade with Israel or Israeli companies.

II. HUMAN RIGHTS AND LABOR LAWS

A. Discrimination

Lakeland requires suppliers to comply with its "Global Human Rights Policy" and will not conduct business with companies that do not provide a workplace free from unlawful discrimination for their employees. This means Lakeland expects suppliers to never discriminate against their employees, contractors, business partners or others on the basis of: age, color, creed, disability, ethnicity, race, religion, gender, gender identity, gender expression, marital status, sex, sexual orientation, national origin, citizenship status, veteran status, political affiliation, or any other characteristic protected by law.

Lakeland's "Global Human Rights Policy" can be found at www.lakeland.com/.

B. Labor

Lakeland's suppliers must comply with all applicable laws, U.S. and international, relating to minimum working age, wages, work hours, and benefits. Overtime should be limited so as to ensure a healthy and safe work environment for employees. Lakeland's suppliers are expected to respect workers' legal rights to organize and engage in collective bargaining.

Suppliers are to adhere to laws relating to hiring practices and only employ workers of the lawful minimum working age. In the absence of local law, suppliers must not employ workers under the age of sixteen (16) years, and young workers are not to engage in hazardous work that could impact their health or safety. Lakeland requires suppliers to comply with its "Statement on Modern Slavery and Human Trafficking" and Lakeland 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 suppliers that participate in or tolerate such practices.

Lakeland's "Statement on Modern Slavery and Human Trafficking" can be found at www.lakeland.com/.

C. Abuse, Harassment, and Retaliation

Suppliers are to maintain work environments free of harassment and abuse. Suppliers and their management must not engage in verbal, physical, sexual, or psychological harassment. Lakeland considers corporal punishment to be physical abuse.

Furthermore, where permissible under the law, suppliers should provide for employees to report work related concerns relating to safety and/or working conditions anonymously to management. Suppliers are expected to never retaliate or condone retaliation against employees who report concerns in good faith.

III. ENVIRONMENTAL, HEALTH AND SAFETY

A. Workplace Safety

As a leader in the safety industry, Lakeland requires suppliers to comply with its "Global Workplace Health and Safety Policy" and will not conduct business with companies that do not share our commitment to ensuring the health and safety of all employees. Suppliers' employees must have the right to refuse unsafe working conditions without fear of retaliation, reprisals, or termination of employment. Suppliers will maintain a safety program that identifies, evaluates and manages occupational health and safety hazards through a process of (1) hazard elimination, (2) engineering controls, (3) administrative controls, and/or (4) use of personal protective equipment (PPE). Suppliers shall provide workers with job-related, appropriately maintained PPE and shall instruct workers in proper use and maintenance of the PPE. Key to suppliers' safety programs are procedures to instruct and train employees on the development and maintenance of a safe, environmentally friendly work environment.

Suppliers will maintain common spaces in the workplace, specifically restrooms, locker rooms, kitchens, and dining areas in a sanitary and functional condition. Common areas are to be sufficient for the size of the work force employed. Suppliers will assure that employees have sufficient time to avail themselves of use of these facilities.

Lakeland's "Global Workplace Health and Safety Policy" can be found at www.lakeland.com/.

B. Conflict Minerals

Lakeland is committed to responsible sourcing of its raw materials and products and expects all suppliers to share this commitment. All suppliers to Lakeland shall comply with the Company's "Global Policy on Conflict Minerals." This policy requires adoption of appropriate sourcing practices; reporting appropriate information to Lakeland; and engaging in due diligence to facilitate compliance with applicable laws and regulations covering Conflict Minerals (as defined therein).

Lakeland's "Global Policy on Conflict Minerals" can be found at www.lakeland.com/.

C. Environmental Laws and Regulations

Lakeland's suppliers are required to comply with the Company's "Global Environmental Policy," as well as with all applicable environmental laws and regulations. Where a law is unclear as to compliance, the supplier should seek counsel from the local regulating authority or a qualified environmental professional.

Lakeland's "Global Environmental Policy" can be found at www.lakeland.com/.

Lakeland further requires all suppliers to comply with the following guidelines to reduce their environmental footprint and provide for a cleaner environment:

(1) Hazardous Substance Management

Lakeland suppliers are to implement a systematic approach to identify, reduce, and eliminate hazardous substances identified in global and regional regulations (REACH, RoHS, California Proposition 65, or other similar regulations). Suppliers may be asked to report results (number of substances reduced or eliminated) to Lakeland in support of any future reporting by Lakeland, whether voluntary or required by applicable law or regulation.

(2) Waste Management

Lakeland suppliers are to implement a systematic approach to identify, manage, reduce, and properly dispose of hazardous and non-hazardous waste and shall report results to Lakeland, if requested, in support of Lakeland's Annual Environmental Impact Report.

(3) Wastewater Management

Lakeland suppliers are to implement a systematic approach to identify, control, and reduce wastewater produced by its operations. Suppliers are to conduct routine monitoring of the performance (reduction) of its wastewater discharge and/or treatment systems and shall report results to Lakeland, if requested, in support of Lakeland's Annual Environmental Impact Report.

(4) Sustainability

As a supplier to Lakeland, compliance with applicable laws and regulations is a requirement, but good corporate citizenship does not end there. Lakeland expects its suppliers to go beyond mere compliance and act as responsible stewards of our environment and natural resources. Suppliers shall work to reduce energy, water, and natural resource consumption by implementing conservation and substitution measures wherever possible. Lakeland suppliers shall implement reduction strategies to reduce and/or eliminate generation of waste, air emissions, and discharges into wastewater systems. Hazardous substances consumption should be minimized by implementation of reduction strategies and substitution.

IV. ETHICS

A. Conflicts of Interest

Lakeland employees and suppliers are expected to make sound and independent business decisions with the best interests of Lakeland as their primary objective. Conflicts of interest may arise when independent decision making is influenced by a personal interest that takes precedent over acting in the interest of Lakeland. Lakeland requires its suppliers to avoid not only actual conflicts of interest, but the appearance of conflicts of interest as well. The appearance of a conflict of interest is often sufficient to call decision making and judgement into question.

B. U.K Bribery Act and U.S. Foreign Corrupt Practices Act

All Lakeland suppliers must comply with the U.K. Bribery Act and the U.S. Foreign Corrupt Practices Act (FCPA) as well any other local laws or regulations that prohibit companies or their affiliates from engaging in corrupt business practices. Such practices include, but are not limited to, promising or offering anything of value for the purposes of improperly influencing another's decision making. These laws extend not only to persons encountered in the course of business, but to their family and extended family members as well. The Bribery Act and FCPA are aggressively enforced and carry a number of harsh penalties for violators ranging from fines, to suspension of trade, to prison sentences. Suppliers should not offer, give, promise to give, or accept any bribes, kickbacks, or other illegal or improper payments, either directly or indirectly through a third party, to influence decision making or to gain an unfair advantage in the market.

C. Accounting and Record Keeping

Suppliers are to maintain processes and controls to ensure the accuracy of their accounting and record keeping. Suppliers must not falsify or misrepresent any records or transactions. All books and records are to accurately represent the underlying transactions.

D. Gifts and Entertainment

Lakeland understands and appreciates the diversity of cultures in which we operate and for this reason permits the giving and receipt of gifts and entertainment in conducting business provided that such are nominal in value, customary and infrequent in occurrence. Suppliers are not to provide gifts or entertainment to attempt to influence, or that may be considered an attempt to influence, the decision-making of Lakeland employees.

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 Supplier Code.
- Gifts of cash, gift cards, or equivalent are not appropriate business gifts and are not permitted by Lakeland without approval of Lakeland's Vice President of Manufacturing or Vice President of Purchasing.

E. Confidentiality and Intellectual Property

Lakeland requires its suppliers to protect and responsibly use the intellectual property and confidential information entrusted to them. This includes, but is not limited to, trademarks, patents, photography, product composition, consumption data, vendor information, and similar information. Furthermore, suppliers are required to comply with all applicable data privacy laws and regulations.

Suppliers' use of Lakeland information and data is restricted to Lakeland related business or as outlined in any applicable agreements between Lakeland and the supplier. Lakeland requires its suppliers to comply with Company policies regarding the protection of confidential information, security, data privacy, and protection of Lakeland's intellectual property. Lakeland suppliers are to honor all of Lakeland's intellectual property rights as well as those of other companies. Suppliers are prohibited from using Lakeland's or a third party's intellectual property, confidential information, copyrighted material, or third-party technology without the prior written consent or license from the owner or authorized licensor of the property in question. Suppliers are prohibited from disclosing, transferring, publishing, or using Lakeland's confidential information except as authorized by the Company.

Suppliers are to comply with the terms of all agreements and commitments to Lakeland, including without limitation all representations, warranties, and confidentiality agreements. Nothing in this Supplier Code shall be deemed to alter or amend any other obligation the supplier may have to Lakeland whether oral or written.

V. ADMINISTRATION

A. Management and Reporting

Suppliers to Lakeland are required to maintain management systems capable of ensuring compliance with this Supplier Code and other Lakeland policies. Management systems should be appropriate for the size and operations of the supplier and shall be designed to identify, mitigate, and reduce risks relating to violations of this Supplier Code. A component of this process shall be regular review of the management system's performance relative to Supplier Code compliance and evaluation and adjustment as needed to facilitate continuous improvement.

This Supplier Code is administered by Lakeland's Global Director of Quality and Compliance ("Lakeland's Compliance Officer"). Lakeland requires its suppliers to promptly inform Lakeland's Compliance Officer of any concerns relating to, or potentially impacting conduct of, business with Lakeland. Where possible and permissible, suppliers are to take all actions to reasonably assist Lakeland in the investigation of good faith allegations of suspected misconduct or violation of this Supplier Code by the supplier.

Concerns regarding this Supplier Code and any knowledge or suspicion of a violation of this Supplier Code shall be reported to Lakeland's Compliance Officer. Suppliers may also refer to the reporting channels set forth in the Company's "Whistleblower Policy" which can be found at www.lakeland.com/.

B. Supply Chain Transparency

As an element of vendor qualification/certification, Lakeland requires that suppliers certify, in writing, their compliance with this Supplier Code and other applicable Lakeland policies as a condition of their qualification/certification. Based on risk assessment or other factors, Lakeland reserves the right to notify its suppliers of the Company's intention to conduct an audit on the supplier's compliance with this Supplier Code. These audits may be physical location audits taking place at one or more of the Supplier's facilities, or may be conducted by written questionnaire or document request. Suppliers shall cooperate fully and in a timely manner with any such request by Lakeland.

Without regard for any request by Lakeland for an audit or certification of compliance, the Supplier, by completing the attached declaration, acknowledges acceptance of this Supplier Code and its intention to comply with its requirements. Acceptance of any Lakeland purchase order will be considered a reaffirmation of acceptance of this Supplier Code and intent to be in compliance.

Supplier Certification and Acknowledgement

By initialing and signing this Supplier Acknowledgement, The Supplier/Vendor listed below, certifies that they have received the SUPPLIER CODE OF CONDUCT (SCOC) and agree to apply it in all business dealings with, for, or on behalf of, Lakeland Industries, Inc., or in connection with Lakeland's goods and services.

Supplier Initials	SUPPLIER ACKNOWLEDGEMENT
	Supplier acknowledges that it has received and read the Lakeland Industries, Inc., Supplier Code of Conduct (SCOC).
	Supplier acknowledges the importance of the SCOC to the proper conduct of business for and with Lakeland Industries, Inc.
	Supplier understands the Supplier's obligations as set forth in the SCOC and commits to conduct business in accordance with the SCOC and to report all matters, as they arise, to the attention of Lakeland Industries, Inc.
	Supplier acknowledges that Lakeland Industries, Inc., may, in its sole discretion, revise the SCOC from time to time. Supplier understands its responsibility to comply with revisions and updates as communicated by Lakeland Industries, Inc.
	Supplier acknowledges that failure to comply with the policies, procedures, or other requirements of the SCOC may, at Lakeland's sole discretion, constitute cause for termination of any agreement by and between Lakeland Industries, Inc., and the Supplier, on terms to be determined by Lakeland.
	Supplier understands that its agreement to comply with the SCOC for Suppliers does not obligate Lakeland Industries, Inc., to conduct business or place any orders with Supplier.

Officer Printed Name:	
Title:	
Company:	
Signature:	
Date:	

*Please Return Initialed/Signed Document to:
Global Director Quality and Compliance*