




Protect Your People®

<h2><u>Whistleblower Policy</u></h2>	<p>Effective Date: September 20, 2021</p> <p>Approved by:  Charles D. Roberson President & CEO</p>
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Scope

This Whistleblower Policy (this "Policy") applies to all Lakeland Industries, Inc. ("Lakeland") employees, officers and non-employee directors, inclusive of part-time, temporary, and contract employees ("Covered Persons"), as well as others who do business with Lakeland, including suppliers, supply chain partners, and customers. As used in this Policy, "Lakeland" includes Lakeland Industries, Inc. and each of its global subsidiaries and affiliated companies.

Purpose

Lakeland is committed to the highest possible standards of ethical, moral and legal business conduct. In conjunction with this commitment, and Lakeland's commitment to open communication, this Policy provides an avenue for Covered Persons and others who do business with Lakeland, including supply chain partners and customers, to raise concerns with the assurance that they will be protected from retaliation, harassment, or victimization for expressing such concerns in good faith. This Policy and attendant procedures accomplish this goal by affording the complainant maximum reasonable level of anonymity. Should a Covered Person feel that anonymity is not required, they should direct their complaint to their supervisor.

Policy

In order to facilitate the reporting of complaints, the Audit Committee of the Lakeland Board of Directors has established the following procedures for (1) the receipt, retention and treatment of complaints regarding accounting, internal accounting controls, or auditing matters and (2) the confidential, anonymous submission by employees of concerns regarding such matters. Covered Persons should report serious concerns or complaints that could have a significant impact on Lakeland, its business, or personnel, including any of the following:

- Questionable accounting, violations of internal accounting controls, or any other auditing or financial matters, or the reporting of fraudulent financial information;
- Suspected violations of law or other fraudulent activities;
- Suspected violations of company policies or procedures, including the Global Code of Business Conduct; and
- Other serious improper conduct.

Regular business matters, complaints or concerns, of an ordinary nature, that do not require anonymity should be directed to the Covered Person's supervisor and are not subject to this Policy.

Safeguards

Retaliation

Retaliation, harassment, or victimization of individuals submitting whistleblower reports in good faith or cooperating with an investigation of a whistleblower complaint will not be tolerated at Lakeland. Anyone engaging in these activities will be subject to appropriate disciplinary action, up to and including termination of employment or any other relationship with Lakeland.

Confidentiality

Every effort will be made to protect the reporter's identity by our hotline vendor and/or Lakeland Human Resources personnel and senior management. It should be noted that the information provided in a whistleblower hotline report may become the basis of an internal and/or external investigation into the issue being reported, by Lakeland management or independent third parties. It is possible that as a result of the information provided in the initial report, or through subsequent investigation, the identity of the whistleblower may be determined. In such cases, management will take all reasonable actions to protect the whistleblower's identity from dissemination beyond that necessary to investigate the issue.

Anonymous Allegations

This Policy allows reporting individuals to remain anonymous at their option. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Malicious Allegations

Malicious allegations, unfounded, false, or exaggerated allegations, directed at coworkers are beyond the scope of this Policy and may result in disciplinary action.

Procedure

Reporting

This Policy is intended to be used for serious and sensitive issues when the reporting person is concerned that reporting through ordinary channels may place their employment in jeopardy and/or result in the complaint being ignored or not investigated properly. Serious concerns relating to financial reporting, accounting, internal accounting controls, auditing matters, or unethical or illegal conduct, may be reported in any of the following ways:

Means of Reporting	Language	Contact Method
Website	Primary	www.lighthouse-services.com/Lakeland
	Chinese (simplified)	www.lighthouse-services.com/Lakeland/csm
	Chinese (traditional)	www.lighthouse-services.com/Lakeland/ctr
	English	www.lighthouse-services.com/Lakeland/eng
	Hindi	www.lighthouse-services.com/Lakeland/hin
	Spanish	www.lighthouse-services.com/Lakeland/spa
	Vietnamese	www.lighthouse-services.com/Lakeland/vie
Telephone	English (U.S. and Canada)	(883) 800-0070
	Spanish (U.S. and Canada)	(800) 216-1288
	French (Canada)	(855) 725-0002
	Spanish (Mexico)	01 (800) 681-5340
	All Other Countries	(833) 802-8200 (click here for access codes and dialing instructions)
E-mail	All Languages	reports@lighthouse-services.com (must include company name with report)
FAX	All Languages	(215) 689-3885 (must include company name with report)

Anyone using the whistleblower hotline contacts, in the above table, to report concerns, will have the ability to remain anonymous, if they choose. However, please be advised the information provided by you may become the basis of an internal and/or external investigation into the issue you are reporting. A reporting

individual's anonymity will be protected to the extent possible by law. However, identity of reporting individuals may become known through the course of the investigation because of information you have provided or because of information developed over the course of investigation. Reports are submitted by Lighthouse Services to Lakeland and may or may not be investigated at the sole discretion of Lakeland.

Employment related concerns should continue to be reported through your normal channels such as your supervisor, local Human Resources manager, or Corporate Human Resources Manager in the U.S. at 256.445.4014 or 256.350.3873 ext. 2218.

Timing

The earlier a concern is reported, through either normal channels or the whistleblower hotline contacts, the easier it is for action to be taken, and the more effective investigations will be.

Evidence

While whistleblowers are not expected to prove the truth of an allegation, the individual submitting a report needs to provide as much information as possible in the report to demonstrate that there are sufficient grounds for concern. Use of the Lighthouse Services website offers a reporting format that may be helpful in prompting useful information that may not otherwise be reported.

How the Report Will be Handled

The action taken will depend on the nature of the concern and the information and detail provided in the report. The Audit Committee of the Lakeland Board of Directors receives a copy of each report and follow-up reports on actions taken by the Company. The Audit Committee provides oversight of this Policy and investigations.

Initial Inquiries

If a report demonstrates that there are adequate grounds for concern, as outlined in "Evidence" above, initial inquiries will be made to determine whether an investigation is appropriate, and what form the investigation should take. Some concerns may be resolved by agreed upon corrective or preventative action without the need for an investigation. Depending on the course of action decided upon, reporting individuals may not be aware of or notice the actions or investigation(s) precipitated by their report.

Feedback to Reporter

Whether reported directly to Lakeland personnel or through the whistleblower hotline contacts, the individual submitting a report may receive follow-up as to the status their concern:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;
- Giving an estimate of the time that it will take for a final response;
- Telling them whether initial inquiries have been made;
- Telling them whether further investigations will follow, and if not, why not.

Further Information

The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the reporting person remains accessible for follow-up. Further information/clarification may be sought from the reporter.

The Lighthouse Services website reporting form allows reporting individuals to create a PIN number for use in checking status of a report and to facilitate follow-up by the investigating body while maintaining the reporting person's anonymity.

Outcome of an Investigation

At the discretion of Lakeland, and subject to legal and other constraints, the reporter may or may not be entitled to receive specific information about the outcome of an investigation. Lakeland reserves the right to modify or amend this Policy at any time as it may deem necessary.