

**Code of Ethics Policy**Issue Date: **05/01/2017**

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Emily Warf, Corporate H.R. Manager

**CODE OF ETHICS****Introduction**

For the past several years, the activities of business organizations, both large and small, have been the subject of increased scrutiny and criticism by the public, the government, and the news media.

This is particularly true of multinational corporations, which have been the object of worldwide demands for public statements of their corporate codes of ethics.

For that reason, it is appropriate for Lakeland Industries, Inc. to restate its position on ethical conduct, based on the original precepts of the business and on policies formulated as the Company has grown.

As a good corporate citizen, Lakeland Industries, Inc. has always endeavored to conduct its business in a manner conforming to the highest ethical standards. The Company's reputation for unquestionable integrity is its most valuable asset in its relationships with its customers, employees, shareholders, and the communities in which its plants are located.

The following statement of business principles has been prepared to guide the future conduct of company activities in an ethical and legal manner. It is not intended to supply answers for every business activity; rather, it is an effort to reiterate the continuing policies of the Company on ethical business behavior, which must be observed by all Lakeland Industries, Inc. employees and representatives throughout the world. It is essential that all employees and representatives conform to these principles as they perform their activities on behalf of Lakeland Industries, Inc.

**Lakeland Industries, Inc. and its employees**

Employees are the Company's greatest asset, and it is a Lakeland Industries, Inc. policy to treat them fairly in all matters and to pay them competitively.

Lakeland Industries, Inc. and its domestic subsidiaries are engaged in a program of full compliance with all federal and state laws applicable to hiring and promoting people on the basis of demonstrated ability, experience, and training without regard to race, religion, sex age, national origin, or other factors requiring affirmative action. The Company requires continuous management attention at all corporate levels to assure compliance with the spirit and letter of this policy.

With this in mind, it is the intent of Lakeland Industries, Inc. 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 requiring affirmative action.

Offer employees a safe, healthy, and clean work environment.

Offer work that challenges the employees and gives them a feeling of satisfaction.

Pay employees fairly in relation to their contributions to the Company's efforts, within the boundaries of current standards.

### **Lakeland Industries, Inc. 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.

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. Like individual citizens, it benefits from such activities as health, welfare, character building, education, and culture. And like individuals, it has the responsibility to support and develop these social and civic activities.

The Company recognizes that employee participation in cultural, social or volunteer organizations can be public service of a higher order, and all Lakeland Industries, Inc. employees are encouraged to participate in public activities of their individual choice.

### **Lakeland Industries, Inc. and its Customers**

The Company shall endeavor to supply its customers with quality products, delivered on schedule and sold at a fair price. Lakeland Industries, Inc. products will be manufactured to the Company's high quality standards and will offer customers all the technical skills of its employees and the expertise of Lakeland Industries, Inc. technology and know-how.

### **Lakeland Industries, Inc. and the Law**

It is the policy of Lakeland Industries, Inc. to comply fully with all valid laws and regulations that govern its operations 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.

There is an obligation, both corporate and individual, to fulfill the intent of the above statement. It is not expected that every employee will have full knowledge of the laws affecting his or her responsibilities. The Company does, however, expect that employees with significant responsibilities will have a general knowledge of prohibited activities involved in 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.

Lakeland Industries, Inc. directors, 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 etc. The Company does not, and will not employ any person under the age of sixteen, in any capacity, in any Lakeland Industries, Inc. facility, and requires the same of the Company's contractors and suppliers. Local managers are expected to ensure processes are in place to ensure compliance to this policy.

As a business deeply involved in the safety industry, Lakeland Industries, Inc. is committed to complying to all local health and safety regulations in all of its facilities and that all of Lakeland Industries, Inc.'s employees, and those of its contractors and suppliers are provided with a safe and healthy working environment, free from any form of discrimination on the grounds of sex, race, religion or color.

Honesty is not subject to equivocation at any time in any culture, and even where the law may be permissive; your corporation 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.

### **Lakeland Industries, Inc. and Business Ethics**

The law is a base for ethical business conduct which should normally be at a level well above the minimum required by law. In its relationships with customers, the Company will offer the same advantages to all and will be fair in all its endeavors. Gifts or bribes for the purpose of influencing the buying decisions of employees of customers or potential customers or persons in a position to influence a buying decision are clearly improper and prohibited.

In dealing with suppliers, an employee shall not solicit, accept, or countenance payments or substantial gifts, regardless of motive, from either a vendor or a potential vendor.

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.

Such acts as price-fixing, restrictive agreements, boycotts, tie-in arrangements exclusive of reciprocal dealings, monopolizing, price inducements, and discriminatory allowances are or may be illegal. All employees shall scrupulously avoid violations of the antitrust laws. 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.

The Company and its units shall make no financial contributions to a political party or to a candidate running for any elective office. This policy applies to all political parties or candidates worldwide, even when permitted by local law. Payments, regardless of amount, to any government

employee, or gifts or services of substantial value or lavish entertainment, regardless of motive, are prohibited.

Relationships with public employees shall be so conducted that neither the officials nor the Company's integrity would be compromised if the full details of the relationship became a matter of public knowledge.

### **Lakeland Industries, Inc. and Conflicts of Interest**

It has always been, and continues to be, the Company's intent that its employees maintain the highest standards of loyalty in their conduct of company affairs. In essence, company employees shall deal with suppliers, customers, and other persons doing business or seeking to do business with the Company in a manner that eliminates considerations of personal advantage.

Because they hold positions of trust in the Company, a director, an officer, or any employees may not make a profit from the Company because of their official position. They are also clearly prohibited from engaging in a competing business.

In addition to the legal responsibility of the directors and officers, it is the duty of all employees to act in the best interests of the Company and to avoid situations which might produce a conflict between their own interests and those of the Company. Employees shall have no financial interest in any firm doing business with or seeking to do business with the Company, nor shall they accept employment outside the Company which may result in a conflict of interest, unless same is fully disclosed and approved by a disinterested group of officers and/or directors.