ANTI-BRIBERY AND ANTI-CORRUPTION COMPLIANCE POLICY

PURPOSE

Lakeland Industries, Inc. ("Lakeland"), itself and its subsidiaries, is committed to conducting business fairly, honorably, with integrity, and in compliance with the laws of every country in which it operates. Lakeland is committed to doing so—most importantly—because it is consistent with the company's values and the right thing to do. Bribery and corruption are also illegal. They can expose the Company to massive fines and other penalties and can lead to prison for employees. All Lakeland directors, officers, and employees must be familiar with and follow each of the requirements described in Lakeland's Anti-Bribery and Anti-Corruption Compliance Policy (the "Policy"). Agents, consultants, business partners, and any other persons or entities doing business on behalf of Lakeland (*i.e.*, third-party intermediaries) must also comply with this Policy.

ANTI-BRIBERY LAWS

Many laws around the world prohibit bribery, including the U.S. Foreign Corrupt Practices Act (the "FCPA"). Specifically, the FCPA is a U.S. criminal law that prohibits offering to pay, paying, promising to pay, or authorizing the payment of money or anything of value, directly or indirectly through a third party, to a foreign official in order to influence any act or decision of the foreign official in his or her official capacity or to secure any other improper advantage in order to obtain or retain business. The FCPA further requires certain types of companies, including all publicly traded companies, to maintain accurate books and records.

In addition to the FCPA, Lakeland employees and independent contractors must be mindful of anti-bribery and anti-corruption laws in numerous other countries and localities in which Lakeland operates. For example, the U.K. Bribery Act of 2010 ("UKBA") is broader in scope than the FCPA insofar as Section 1 of the Act makes it an offense for a person to offer, promise, or give a financial or other advantage to any person – and not just a foreign public official – to reward or to bring about improper performance. India's Prevention of Corruption Act, 1988 ("PCA") similarly prohibits giving things of value to public servants in order to gain an "undue advantage," with potential imprisonment of three to seven years. Likewise, most other countries, states, and localities have recently implemented, updated, or increased enforcement of their respective anti-bribery and anti-corruption laws and regulations.

This Policy is designed to comply with the requirements of the FCPA, the UKBA, the PCA, as well as the anti-bribery laws of other jurisdictions in which Lakeland conducts business.

POLICY SUMMARY

The Policy can be summarized in four points:

- We never pay or accept bribes – in any amount – directly or through a third party - in connection with our business.
- We never corruptively give anything of value to anyone, including government officials, directly or through a third party, to improperly influence their decision making.
- We only give appropriate business courtesies, charitable contributions, and political contributions that cannot be mistaken for bribes.
- We record our transactions openly and accurately.

Any attempt to pay, authorize, or promise a bribe, kickback, or any other form of corrupt payment – in any amount – is strictly prohibited. It does not matter if the intended recipient of the bribe works in the public or private sector. It does not matter if the intended recipient conducts business in a country where paying bribes is a common practice, "necessary to get anything done," or "engrained in the business culture." And it does not matter if "everyone else is doing it" or the chance of being caught or prosecuted is low.

As noted above, any payment that cannot be made directly to an individual under this Policy may also not be made indirectly, such as to a close relative, through a friend, via the individual's business, or through some other intermediary.

To ensure compliance with this Policy, and consistent with our accounting policies, all transactions must be recorded accurately and with sufficient detail to identify the actual purpose for each payment. Lakeland strictly prohibits any "off-the books" accounts or payments, or making any false, misleading, or incomplete entries in the books and records in an attempt to obscure the actual purpose of a payment. This prohibition applies regardless of the amount of the payment.

WHO IS COVERED BY THIS POLICY?

This Policy prohibits bribery and corrupt behavior by:

- Any employee, officer, or director of the Company; and
- Any person acting on behalf of the Company, including third parties, such as distributors, agents, brokers, representatives, consultants, or business partners.

WHAT IS BRIBERY & CORRUPTION?

Bribery is the offer, promise, giving, demanding, or acceptance of anything of value as an inducement for an action which is illegal, unethical, or a breach of trust.

Corruption consists of an offer, payment, or promise that is intended to induce the recipient to misuse his or her official position, whether as a government official or as the representative or employee of a private business. Acts of bribery and corruption are designed to influence the individual in the performance of his or her duties and to incent him or her to act dishonestly.

WHAT MIGHT CONSTITUTE A BRIBE OR CORRUPT PAYMENT?

Bribes can take many different shapes and forms. There will sometimes be a "quid pro quo" – that is, the bribe will be offered or paid in exchange for some specific benefit or improper business advantage. Other times bribes can be more about securing general influence and favor to secure an advantage over a competitor. Bribes may be explicit or implied.

Bribes can be made by using anything of value, including:

- Cash, cash equivalents (*e.g.*, gift cards), or loans;
- Payments for travel or entertainment;
- Favors, including offers of employment or internships;
- Gifts (*e.g.*, perfume, jewelry, use of club memberships);
- Donations to a charity affiliated with or sponsored by a person; and
- Political contributions.

Examples of public bribery include, when as a result of a bribe, a government official:

- Overlooks a violation or tolerates non-compliance with applicable laws;
- Does not perform a task that should otherwise be performed (*e.g.*, does not conduct a required inspection prior to issuing a permit);
- Reduces customs duties;
- Grants a favorable tax treatment or permit; or
- Directs business to Lakeland.

Examples of commercial bribery include:

- Paying a kickback to a purchasing agent in order to cause that agent to choose to buy the bribe payer's products rather than those of a competitor;
- Providing anything of value to an executive or officer of a business partner in order to cause that partner to conduct business with the bribe payer; and
- Paying a third party in order to unlawfully obtain a recommendation or referral for Lakeland.

ISSUES INVOLVING GOVERNMENT OFFICIALS

This policy prohibits public and commercial bribery – or bribery of public officials or private business people. However, bribery of government officials can create greater risk to the company. So, it is important to understand, when a government official is involved, as even greater scrutiny of payments, gifts, meals or entertainment may be required. The definition of government official may be broad and includes:

- Officers or employees of any local, provincial, or national government (*e.g.*, members of Parliament, police officers, firefighters, members of the military, tax authorities, permit issuers, customs inspectors);
- Directors, officers, representatives, agents, or employees of any state-owned or controlled business or company (*e.g.*, government-funded hospitals; universities; water, electricity, telecommunication utilities);
- Officers or employees of a public international organization (*e.g.*, United Nations, International Olympic Committee, International Red Cross, World Bank);
- Individuals acting in any official capacity or on behalf of any government or public international organization (*e.g.*, an official advisor or consultant to a government);
- Officers or employees of a political party; and
- Candidates for political office.

ISSUES INVOLVING BUSINESS COURTESIES

"Business courtesy" generally refers to something of value that is provided to customers and potential customers as a means of developing a legitimate relationship with that customer. This includes meals, entertainment, discounts on products and services not readily available to the general public, payment of travel expenses, personal favors, and token gifts.

Lakeland prohibits its employees from corruptly providing business courtesies of any value to any individual, including foreign officials, in exchange for that individual taking some action that benefits Lakeland. Because some of Lakeland's customers and potential customers are state-owned or state-controlled companies, business courtesies to these customers may implicate both U.S. laws (including the FCPA) and local laws.

The Company must take care to ensure that business courtesies do not constitute a corrupt payment to individuals, including government officials. Only legitimate and reasonable business courtesies may be provided by Lakeland employees to customers. A good way to judge the propriety of a contemplated business courtesy is to ask yourself whether it would appear to an objective person that the courtesy was intended to influence the decision maker recipient. Imagine a news story reporting on the gift. Was the value significant to the recipient? Did the Company have business pending before the recipient? A pending bid for business or some sort of pending regulatory approval?

Any business courtesy:

- Should be of a modest value;
- Should be reasonably related to a legitimate business purpose;
- Should be lawful under all applicable laws (including local law);
- Should not embarrass Lakeland if disclosed publicly;
- Should not create the appearance that the giver is entitled to preferential treatment; and
- Should not influence, or appear to influence, the recipient's ability to conduct his or her official duties objectively and independently, to act in the best interest of his or her company, agency, or entity, or to prevent the recipient from awarding business to one of the provider's competitors.

Appropriate gifts and other business courtesies should be provided infrequently. The collective amount of gifts provided to a single person in a twelve-month period should typically be less than $100, and any gifts given by Lakeland employees, as appropriate, should usually bear the Lakeland logo. It is rare that business courtesies are appropriately offered to government officials acting as government officials.

The following gifts, meals, entertainment, or business courtesies are **never** permitted:

- Gifts or benefits given in the expectation of, or as a reward for, the provision of business or favorable official action;
- Gifts or loans of cash or cash equivalents (including, but not limited to, shopping cards);
- "Adult" or other inappropriate entertainment;
- Meals or entertainment given as a specific inducement to influence official decision making, to obtain or retain business, or to reward the award of prior business; or
- Gifts that are requested by the recipient.

Infrequently, it may be appropriate for Lakeland personnel to pay for travel expenses of officials, customers, suppliers, or other business associates, such as where it is necessary to visit a particular facility for an inspection or for a contract negotiation session. Because such offers in nearly all cases require a non-nominal expenditure, offers to pay for travel-related expenses always require the prior approval of the Compliance Point of Contact, as listed on the company website, or their designees.

In reviewing the travel request, the approver will consider whether:

- The travel is directly related to a legitimate business purpose;
- The class of travel is appropriate in the business context;
- The proposed expenditures comply with United States and local laws and customs; and
- The itinerary includes side trips that are of a personal benefit (which are always prohibited).

Paid-for travel for family members is generally inappropriate. In no event is it permissible for Lakeland personnel to provide a trip as a reward for obtaining or retaining business, or as a reward for the award of previous business.

ISSUES INVOLVING THIRD PARTY INTERMEDIARIES

The definition of third-party intermediaries is broad and could include agents, brokers, distributors, professionals (lawyers/accountants), franchisees, consultants, and joint-venture partners. While use of third parties can help us reach our goals, we need to be aware that these arrangements can potentially present Lakeland with significant risks, because the Company cannot as easily control the actions taken by third parties on the Company's behalf.

Third parties who act on Lakeland's behalf must operate in accordance with this Policy at all times. In order to ensure this, it is imperative that Lakeland knows and keeps track of the companies with whom it does business and through whom it offers its services. The FCPA, UKBA, PCA, and many other non-U.S. jurisdictions outlaw the payments of bribes through third parties to the same extent as if they were paid directly by Lakeland. Accordingly, special care and due diligence must be exercised when retaining consultants, agents, and other third-party representatives to assist Lakeland.

REPORTING CONCERNS

Any employee of Lakeland should immediately report to their supervisor, Human Resources, the Compliance Point of Contact, as listed on the Company website, or the Compliance Hotline (including anonymously if they choose), if they believe there is evidence that a director, officer, employee, agent, representative, or business partner of Lakeland has violated or may violate this Policy, the FCPA, or any other anti-corruption law. Failure to report such information is cause for disciplinary action up to and including termination. The Company has zero tolerance for retaliation of any kind against any individual who—in good faith—makes inquiries, reports concerns, or participates in external or internal investigations. Any employee who is concerned about retaliation or feels that he or she has been subjected to such retaliation should immediately contact Human Resources or the Compliance Hotline.

This Policy cannot cover every situation or provide information on every law that may be applicable where Lakeland conducts business. If you are ever uncertain, feel uncomfortable about, or question the ethics of any situation or request, you should seek further guidance from the Company.

The Compliance Hotline is a toll-free, confidential, third-party service set up for employees to report possible violations of the law, this Policy, or other Lakeland policies. The Hotline is staffed 24 hours per day and calls can be accepted in any language. Callers may make reports anonymously if they choose. The Compliance Hotline can be reached by:

Means of Reporting	Language	Contact Method
Website	Primary	https://report.syntrio.com/lakend
	English (U.S. and Canada)	833-800-0070

Telephone	All Other Countries	800-603-2869 See Attachment A for access codes

Lakeland reserves the right to modify or amend this policy at any time as it may deem necessary.