

# REPORTING AND WHISTLEBLOWER POLICY

#### **PURPOSE**

Lakeland Industries, Inc. ("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, Lakeland is implementing this Reporting and Whistleblower Policy (this "Policy") to ensure that its stakeholders know how to report their good faith concerns about legal, ethical, and compliance matters and how those concerns will be addressed and understand they may report their concerns without fear of retaliation.

#### SCOPE

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

#### **POLICY**

# Lakeland Requires Its Stakeholders to Report Legal, Ethical, and Compliance Matters

Covered Persons should report any ethical, legal or compliance concerns or complaints that could have an 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.

# **Lakeland Provides an Anonymous Means to Report**

Lakewood encourages all employees to share their concerns with their supervisors; all non-employee directors to share their concerns with the Audit Committee of the Board; and all business partners to share their concerns with their Lakeland point of contact. However, Lakeland recognizes that some Covered Persons may not report if they cannot do so anonymously. As such, Lakeland is committed to providing a hotline for anonymous reporting and to maintaining the confidentiality of reporters to the extent feasible.

# **Lakeland Does Not Retaliate**

Lakeland encourages reporting and will not retaliate against any Covered Person who makes a complaint or participates in an investigation in good faith. Any Covered Person who engages in retaliation will be subject to disciplinary action, up to an including termination or their employment or business relationship with Lakeland.



## **Lakeland Addresses All Reports**

Lakeland will address all reports it receives in the appropriate manner. Lakeland will notify all complainants that their complaint has been received and will provide complainant's information about the resolution of their complaints to the extent it is able to do so.

#### **PROCEDURES**

#### **How to Report**

Individuals may report concerns relating to any unethical, improper, or illegal conduct, including violations of the Global Code of Business Conduct and concerns relating to financial reporting, accounting, internal accounting controls, and auditing matters in any of the following ways:

Means of Reporting	Language	Contact Method
Supervisor or Business	Primary	In person, by phone, or in writing
Contact		
Compliance Point of	Primary	Roger Shannon
Contact		
Website	Primary	https://report.syntrio.com/lakeland
	English (U.S. and Canada)	833-800-0070
Telephone	All Other Countries	800-603-2869
		See Attachment A for access codes

Anyone using the whistleblower hotline contacts, in the above table, to report concerns, will have the ability to remain anonymous, if they choose.

When reporting, individuals should provide as much information as possible about (1) the nature of their concern, (2) how they learned about it, (3) when and where it occurred or is occurring, and (4) who is involved.

# When to Report

Individuals should report concerns as soon as they learn of them. The earlier an issue is identified, the easier it is for action to be taken, and the more effective investigations will be.

# **How Reports Will Be Addressed**

Reports will flow through a central point of contact. All reports whether made by hotline or through a supervisor or business contact should be provided to Lakeland's Compliance Point of Contact, Roger Shannon. All individuals receiving reports regarding potential violations of law or the Global Business Conduct Policy including accounting and financial reporting concerns should report them to the Compliance Point of Contact within two (2) business days or as soon as practicable. Any complaint relating to an accounting or financial reporting concern or that involves an officer or director of Lakeland may also be provided directly to the Co-Chairs of the Audit Committee: Jeff Schlarbaum (Jschlar@live.com) and Marty Glavin (mglavin57@gmail.com).

**Reports will be logged and reviewed by the Audit Committee.** All reports and any action taken will be logged by the Compliance Point of Contact or the Audit Committee Chair as appropriate. 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 quarterly. The Audit Committee provides oversight of this Policy and investigations.



**Action will be taken.** The action taken will depend on the nature of the concern and the information and detail provided in the report. Some concerns may be resolved by agreed upon corrective or preventative action without the need for an investigation. Some reports may not contain enough information to investigate. Some reports may be investigated internally while some reports may require the assistance of outside investigators or legal resources.

Reporters will be contacted. Whether reported directly to Lakeland personnel or through the whistleblower hotline contacts, the individual submitting a report should receive follow-up from the hotline vendor, the Compliance Point of Contact or the Audit Committee as to the status of their concern. An individual should always be notified that their complaint has been received and is being addressed and when action has been concluded. Depending on the circumstances, Lakeland may or may not be able to share all the details regarding any investigation or the particular action taken. The Syntrio 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.

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

### **REVISION HISTORY**

Ownership	Executive Leadership Team	
Update authority	Jim Jenkins/Roger Shannon	
Issue date	January 9, 2025	
Effective date	January 9, 2025	
Review cycle	Annual	

## **Version Control**

The following table contains a brief history of the updates made to this document.

Name	Description of Change	Date	Version
	Initial edit	September	1.0
		20, 2021	
Hilary Hagen	Formatting, hotline instructions, AC contacts	January 9,	2.0
		2025	

# **Document Approval**

The following table contains document approval.

Name	Title	Date
Charlie Roberson	President and CEO	September 20, 2021
Jim Jenkins	President and CEO	January 9, 2025



# Attachment A

International Access Codes



# AT&T USA DIRECT CALLING INSTRUCTIONS FOR LOCATIONS OUTSIDE OF NORTH AMERICA WORLDWIDE TOLL-FREE NUMBER: 800-603-2869

Calling instructions for international locations:

- 1. Make sure you have an outside line.
- 2. Enter the Access Code for the country and/or the telephone system you are calling from. You will then hear a 'bong'.
- 3. An English-language voice prompt will ask for the number you are calling.
- 4. Enter our toll-free number: 800-603-2869. There is no need to dial "1" before the toll-free number.
- 5. You are now connected to the hotline.
- 6. A Lighthouse greeting will be played in multiple languages. Make a choice from the pre-recorded language prompts or press 000 and tell the English operator the language you speak (preferably in English). An interpreter will then join the call in 2-3 minutes. The Lighthouse operator will interview you, aided by the interpreter.
- 7. A report in English is then sent to the designated recipient(s) of your company.
- 8. Access codes are subject to change.

# **ACCESS CODES:**

- US / Canada: 833-800-0070 (no access code needed)
- Mexico: 800-681-5340 (no access code needed)
- Uruguay: 000-410
- Argentina: 0-800-555-5288, 0-800-222-1288
- Chile: 800-225-288 (Claro), 800-360-312 (ENTEL), 800-360-311 (ENTEL), 800-800-288 (Telefonica)
- Romania: 0808-03-4288 (Telekom Romania)
- Poland: 0-0-800-111-1111
- Belgium: 0-800-100-10
- UK: 0-800-89-0011 (British Telecom)
- Germany: 0-800-225-5288
- France: 0-800-99-0011 (Orange), 0805-701-288 (Telecom Development)
- Spain: 900-99-0011
- Austria: 0-800-200-288
- Italy: 800-172-444
- India: 000-117
- China: 10-811 (South, Shanghai China Telecom)
- Vietnam: 1-201-0288 (VNPT)
- Russia: 8^10-800-110-1011, 363-2400 (Moscow, St. Petersburg), 8^-495-363-2400 (outside Moscow), 8^812-363-2400 (outside St. Petersburg)
- Kazakhstan: Web and email-based reporting available only
- New Zealand: 000-911
- Australia: 1-800-551-155 (Optus), 1-800-881-011 (Telstra)

