

CORPORATE POLICY AND PROCEDURE		
Policy Number: 400.16	Effective Date: October 1, 2022	Version Number: 2 (Updated 2025)
SECTION: Ethics and Compliance Policies	Subject: Human Rights Policy	Prepared and Approved By: Corporate Compliance

Statement of Purpose

Lincoln Electric is dedicated to the recognition and safeguarding of human rights in all countries in which we operate.

Scope

Employees and business partners are expected to comply with this policy, as well as our Code of Conduct, which includes a specific prohibition of human rights abuse, slavery, human trafficking and unlawful child labor.

Policy

This policy is guided by international human rights principles encompassed by:

- the Universal Declaration of Human Rights
- the UN Global Compact’s Ten Principles and the Sustainable Development Goals
- the UN Guiding Principles on Business and Human Rights (“UNGPs”)
- the OECD Guidelines for Multinational Enterprises
- international labor standards, like the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, and
- applicable laws and regulations

EMPLOYEE RELATIONS

Lincoln Electric provides employees the opportunity to work in an environment that is free from harassment and intimidation. We maintain a 'zero tolerance' harassment policy for employees and encourage reporting of any such issues. Our policy prohibits any verbal, written or physical conduct that degrades, belittles, ridicules or intimidates others, including sexual harassment. Where local laws and our policy, differ, the higher standard will apply to all of our employees and non-employees (ie: visitors, contractors, customers or vendors) who initiate prohibited behavior. Managers and Human Resources employees are responsible for supporting this environment by enforcing open door policies and resolving employee concerns in a fair and timely manner.

FORCED LABOR & CHILD LABOR

Lincoln Electric stands against all forms of slavery, including involuntary or coerced labor, unlawful child labor, human trafficking and sex trafficking and against the funding of armed groups engaged in conflict and human rights abuses. We will not tolerate any act of recruiting, harboring, transporting, providing or obtaining a human being for compelled labor or other unlawful purposes within our business or supply chain.

EQUAL OPPORTUNITY AND ANTI-HARASSMENT

Lincoln Electric supports equal opportunity and hiring employees that represent a broad spectrum of cultural ethnicities. Our workplace policy is dedicated to providing a work environment that is free from illegal harassment and discrimination, including based on race, color, religion, national origin, age, citizenship, gender, marital status, pregnancy, sexual orientation, gender identity and expression, veteran status, or physical or mental disability, or any other protected classification.

Lincoln Electric embraces diversity in its many forms and we are committed to equal opportunity, fair treatment and advancement opportunity to all persons based on merit in order to provide a rich mixture of talent, ideas, opinions and experiences.

COMPENSATION AND WORKING TIME

At Lincoln Electric, we have a longstanding commitment to equal opportunity in all aspects of employment – including employee compensation, job placement and promotion regardless of gender, race or other personal characteristics. We review and update our HR processes and benchmark roles and compensation externally on a regular basis to help prevent bias and promote a diverse and inclusive workplace. We are committed to complying with local legal requirements governing hours of work or working time.

FREEDOM OF ASSOCIATION/COLLECTIVE BARGAINING

Lincoln Electric considers its relations with its employees to be good. While Lincoln Electric does not believe employees need a third party to stand between them and the Company, we recognize that our employees have the right to express, promote, pursue and/or defend their interests individually or collectively as permitted by applicable law.

ENVIRONMENTAL HEALTH AND SAFETY

Lincoln Electric is committed to minimizing risks to human health and the environment in and around the workplace. We are dedicated to maintaining the health and safety of our employees, customers and neighbors as well as preserving the integrity of our environment while ensuring the quality of our products and services. This commitment is led by management and is the individual and collective responsibility of all Lincoln employees.

ANTI-CORRUPTION

Lincoln Electric complies with applicable laws globally and we maintain high standards and adherence to doing business fairly and transparently wherever we operate, even if our standards are above local laws and customs. We outline our standards in our Anti-Corruption policy and mandate training and reporting procedures for managers and others who may encounter these issues in their work.

SUPPLIERS

In furtherance of its commitment to human rights, Lincoln Electric expects its suppliers to comply with all laws, rules, and regulations in effect in the countries and jurisdictions in which they do business. Lincoln Electric's Supplier Code of Conduct outlines our expectations regarding business practices of our suppliers. This Code provides a means of holding suppliers accountable for failure to meet company standards to illegal child labor, forced labor, human trafficking and slave labor. We reserve the right to request confirmation of compliance with the Supplier Code of Conduct.

Lincoln Electric's terms and conditions for the purchase of materials include a requirement that suppliers be familiar with Lincoln Electric's Code of Conduct and that they undertake to comply with it, including the provisions regarding slavery, forced, involuntary or coerced labor, unlawful child labor, human trafficking or sex trafficking by any employee, agent, subcontractor or supplier in the operation or support of its business or the manufacture and distribution of products to Lincoln.

TRAINING

Our Compliance department oversees and promotes a culture of integrity and compliance across all of our businesses worldwide to ensure our employees are knowledgeable, properly trained and aligned with our principles and applicable laws. Our compliance-training program includes mandatory training courses for our global non-manufacturing employees and other key personnel that includes training on our Code of Conduct, Anti-Corruption, Conflicts of Interest, Human Trafficking, Anti-Harassment, Anti-Discrimination , Workplace Fairness, and other topics.

Reporting Suspected Violations and Other Ethical Concerns

We are committed to an environment where open, honest communication is expected, retaliation is not tolerated, and where employees, officers, directors, vendors and commercial partners feel comfortable reporting any conduct that is believed to violate our policies, Code of Conduct, or laws. Questions or concerns about a Lincoln Electric employee or business partner violating our values, Code of Conduct, this Policy or applicable laws can be directed to:

- ❖ A member of the Lincoln Electric Compliance Team at Lincoln_Compliance@lincolnelectric.com or
- ❖ A member of the Lincoln Electric Legal department

Reports may also be submitted through EthicsPoint, which is provided and maintained by Navex Global, an independent third party, is available 24/7 in 15 different languages and gives the option to remain anonymous where allowed by law:

- ❖ <https://lincolnelectric.ethicspoint.com>
- ❖ By phone, toll free at 1-855-869-7200 from the U.S. or Canada; visit the EthicsPoint website above for additional international numbers.