

LINCOLN ELECTRIC

# Supplier Code of Conduct



**LINCOLN**<sup>®</sup>  
**ELECTRIC**

# A Message for Our Suppliers

**At Lincoln Electric, we believe that the company you keep says a lot about who you are. We conduct business with honesty and integrity while complying with the laws and regulations of the countries in which we operate and respecting internationally recognized human rights. We endeavor to choose Suppliers who share these same values.**

This Supplier Code of Conduct outlines our expectations for our Suppliers as defined below. The standards set out here are essential factors in our Supplier selection process and are considered whenever we enter into, extend, or terminate a relationship. This Supplier Code of Conduct will also be used as the foundation of our ongoing evaluation process for all Suppliers.

We expect our Suppliers to promote these standards throughout their own supply chains. This includes taking reasonable steps to ensure that subcontractors, labor providers, and other third parties involved in delivering goods or services to Lincoln Electric meet the same ethical, legal, and safety expectations.

## Scope

This Supplier Code of Conduct applies to all individuals and organizations that provide goods or services to Lincoln Electric. This includes those who are under contract with Lincoln Electric or any of its subsidiaries, affiliates, partnerships, or joint ventures (collectively referred to as “Lincoln Electric” or “the company”). These individuals and organizations are referred to as “Suppliers,” and may include vendors, consultants, and other business partners.

This Supplier Code goes hand-in-hand with Lincoln Electric’s Human Rights Policy, Code of Conduct, and other company rules. We understand that each Supplier will have their own way of putting our shared values into action. As part of that, we expect all Suppliers to follow the principles listed below in how they do business.

## LINCOLN ELECTRIC SUPPLIERS

# Put Health and Safety First

Lincoln Electric is committed to protecting the health and safety of its workforce, whether they are in our facilities or facilities run by our Suppliers. Health and safety management ensures that we all return to our loved ones unharmed. It also demonstrates social responsibility, which protects our brand and drives business results.

## Supplier Workplace Safety

Lincoln Electric believes all workers have a right to a safe working environment.

- Suppliers must ensure that all employees have access to a workplace that is free from recognized hazards and meets applicable safety standards.
- Workers must be trained on safety procedures, equipment use, and emergency protocols relevant to their roles.
- Suppliers must provide workers with appropriate personal protective equipment (PPE) at no cost to the workers, where such equipment is required by law or necessary because of the nature of the work.
- Workers must be encouraged to report unsafe conditions or incidents without fear of retaliation.
- Suppliers must promote a work environment that supports employee mental health by preventing harassment and encouraging a respectful work environment.



### Working Together to Meet High Standards

## Helpful Compliance Tips

**Know the rules.** (And make sure your employees do too). Know and comply with all applicable health and safety regulations and make sure your employees know how those rules apply to their jobs.

**Lead with prevention.** Don't wait for an accident to happen. Regularly inspect equipment, review procedures, and update safety protocols based on near misses or feedback.

**Make safety everyone's responsibility.** Empower employees at every level to report unsafe conditions without fear of retaliation.

**Invest in training that sticks.** Go beyond check-the-box exercises. Use hands-on training, signage, and demonstrations to keep safety top of mind.

## LINCOLN ELECTRIC SUPPLIERS

# Respect the Dignity and Human Rights of All People

Lincoln Electric supports universal human rights and opposes illegal or inhumane labor practices. We respect the rights of every individual in all of the markets where we operate. We also believe it is our responsibility to uphold the highest standards of ethical behavior and integrity within our global operations and supply chain.

## No Forced or Child Labor

Lincoln Electric stands against all forms of slavery and we will not tolerate any form of slavery within our supply chain.

- Suppliers that do business with Lincoln Electric are prohibited from using any form of slave or involuntary labor including prison labor, child labor, debt bondage or forced labor.
- Suppliers must not engage in human trafficking.
- Suppliers must not use corporal punishment, physical or psychological abuse, threats of violence, or other forms of physical or mental coercion.



### Working Together to Meet High Standards

## Helpful Compliance Tips

**Know who is in your supply chain.** Map subcontractors, labor brokers, and recruitment agencies to ensure transparency and accountability.

**Watch for red flags.** Withheld wages or passports, overbearing control of workers, or fear of retaliation for raising concerns may point to deeper human rights issues.

**Always maintain accurate payroll records.** Document wages, overtime pay, and hours worked for all employees, as required by law.

**Promote a respectful culture in the workplace.** Encourage respectful communication, and make sure grievance processes are accessible to all.

## Reasonable Working Hours, Competitive Wages and Benefits

Lincoln Electric believes that workers should be treated with dignity and respect.

- Our Suppliers must comply with all applicable wage and hour labor laws, including compensation, benefits, and overtime.
- Workers must be paid at least the minimum legal wage or, in cases where there is no legal minimum wage in the jurisdiction, a competitive wage.
- Suppliers must operate in a way that ensures humane working conditions.
- Workers should receive necessary time off, paid annual leave and holidays, as required by local laws



## Prohibiting Discrimination and Harassment

Lincoln Electric embraces diversity in its many forms and is committed to equal opportunity, fair treatment, and advancement opportunities for all. We strive to create a workplace that includes a rich mix of talent, ideas, opinions, and experiences. And we do not tolerate any form of discrimination.

- Our Suppliers must provide equal employment opportunities and must not discriminate based on any characteristics protected by law.

- Suppliers must foster respectful workplaces where harassment, abuse, and intimidation of any kind is not tolerated.
- Suppliers should have formal policies that prohibit harassment and discrimination.
- Hiring, promotion, and compensation decisions should be based on qualifications, performance, and experience, not personal characteristics unrelated to job performance.

## LINCOLN ELECTRIC SUPPLIERS

# Prioritize Sustainability

At Lincoln Electric, we believe that operating sustainably is a key component of how we help our customers build a better world. We work to respect the environment, conserve natural resources, and promote sustainability across our global operations and supply chain. We expect our Suppliers to share this commitment by reducing their environmental impact and sourcing materials responsibly. This includes taking meaningful steps to avoid the use of conflict minerals that contribute to human rights abuses.

## Protecting The Environment

We view sustainability as a shared goal. We seek Suppliers who are committed to reducing their environmental footprint and contributing to a more sustainable future through responsible practices and continuous improvement.

- Suppliers must comply with all applicable environmental laws, regulations, and standards, and must furnish any applicable environmental data needed by Lincoln Electric to comply with regulations in a timely manner.
- Suppliers must maintain all required permits and registrations and comply with all regulatory requirements attached to those permits.

## Working Together to Meet High Standards

### Helpful Compliance Tips

**Know your footprint.** Track how your operations use energy, water, and raw materials, and look for ways to reduce waste and emissions over time.

**Use what you need, not more.** Prioritize efficient equipment, recycling programs, and responsible packaging to reduce environmental impact. Choose materials that are recyclable and eliminate unnecessary packaging where possible.

**Handle hazardous materials carefully.** Train employees on proper storage, use, and disposal of chemicals. Always follow safety regulations and never mix incompatible substances.

**Ask tough questions.** Understand where your materials come from and whether smelters or refiners are verified as conflict-free.

**Build sustainability into your processes.** Consider environmental impact when making decisions about suppliers, logistics, and product design.

- Suppliers should actively work to reduce their environmental impact. They should seek to reduce waste, greenhouse gas emissions, and energy and water use in their operations.
- We encourage Suppliers to use sustainable materials and practices that support long-term environmental health.

## Responsible and Conflict-Free Sourcing

Lincoln Electric is committed to responsible sourcing. We expect our Suppliers to comply with all applicable laws, regulations, and customer requirements related to substances contained in products and the responsible sourcing of minerals. .

- Suppliers must only provide Lincoln Electric with products and packaging that are free from banned or restricted substances and that do not contain conflict minerals.
- Suppliers must perform sufficient due diligence on their own supply chains to determine whether products or packaging provided to Lincoln Electric contain any restricted or banned substances or conflict materials.
- Suppliers are expected to provide accurate and timely information about their use of banned or restricted substances or conflict minerals upon request.
- Suppliers must commit to being or becoming “conflict-free,” meaning they only source materials from conflict-free smelters.
- If Suppliers do provide Lincoln Electric with products that contain conflict minerals, they must be able to show that those materials are sourced from conflict-free smelters.

## Recyclable Materials and Packaging

Lincoln Electric encourages Suppliers to take steps that reduce environmental impact across the full life cycle of the products and materials they provide.



- Suppliers should aim to reduce excess packaging and use recyclable or recycled materials whenever possible.
- Packaging materials should meet relevant technical performance standards and protect products effectively throughout manufacturing, transport, and delivery.
- Packaging design should consider environmental impact, including ease of recycling, material efficiency, and minimal waste.
- Suppliers are encouraged to evaluate the environmental performance of recycled materials used in packaging as part of their qualification and approval process.

## LINCOLN ELECTRIC SUPPLIERS

# Conduct Business Ethically, with Honesty and Integrity

Lincoln Electric believes that how we do business is just as important as the caliber of the products we produce. We are committed to acting honestly, fairly, and transparently in everything we do, and we expect the same from our Suppliers. We don't do the right thing just because it is a legal obligation. In fact, we hold ourselves (and our partners) to a higher standard, always striving to do and be better.

## Upholding Ethical Standards and the Law

Lincoln Electric always obeys the law and has an active ethics and compliance program designed to help our company operate ethically everywhere it does business. We expect our Suppliers to do the same.

- Suppliers must comply with the laws of their countries and with all other applicable laws, rules and regulations. Many times, Suppliers who do work for Lincoln Electric must also comply with certain laws of the United States even if they are located in another country.
- Suppliers must maintain accurate and transparent records and never falsify documents, misrepresent facts, or conceal improper activity.

## Working Together to Meet High Standards

### Helpful Compliance Tips

**Follow the law, even when no one is watching.** Know and follow all applicable laws and regulations. If you are unsure what the law requires, ask questions or seek advice before acting.

**Educate your team.** Make sure employees know how applicable laws apply to their job responsibilities.

**Be honest in all communications.** Never misrepresent facts in contracts, reports, or conversations with customers, regulators, or suppliers.

**Say no to shortcuts.** Avoid gifts, bribes, or side deals that could create an unfair advantage or violate local or international laws.

**Put transparency first.** Disclose potential conflicts of interest early and fully to avoid the appearance of bias or favoritism.

**Compete fairly.** Do not share sensitive pricing, customer, or market information with competitors, even casually.

**Spread the message.** Encourage your own Suppliers and subcontractors to follow the same expectations you commit to. Responsible sourcing starts with shared accountability.

### Upholding Ethical Standards and the Law (cont)

- Suppliers must ensure that their employees are aware of the laws and regulations that might impact their jobs and put systems in place to educate employees and monitor compliance.
- Suppliers are encouraged to promote a culture of ethics and integrity, where employees feel responsible for doing the right thing and are supported in raising concerns.
- Suppliers must promote ethical and legal compliance within their own supply chains and take reasonable steps to ensure that subcontractors and business partners follow similar standards.
- Suppliers are expected to report concerns about legal or ethical violations promptly and to cooperate fully with investigations.

## Preventing Bribery and Corruption

Lincoln Electric believes that businesses grow by delivering quality products and good services, not by engaging in corrupt behavior. We do not tolerate bribery, corruption, or any unethical attempts to influence business decisions and we expect our Suppliers to uphold the same standard.

- Suppliers must not offer, promise, authorize, or accept bribes, kickbacks, or anything of value with the hope of influencing a business decision or creating an unfair business advantage.
- Suppliers should remember that bribery doesn't just involve cash and use caution when giving anything of value, including lavish entertainment or travel expenses, gifts, job offers, favors, and political or charitable donations.
- Suppliers must avoid bribery of everyone, including government officials and individuals in the commercial and private sector.

## Gifts and Business Hospitality

Lincoln Electric believes that ethical business relationships are grounded in integrity, not personal favors. While modest gifts or hospitality may be part of doing business in some cultures, our Suppliers must never offer or accept anything that could influence, or appear to influence, objective decision-making.

- Suppliers should never offer or accept gifts, entertainment, travel, or other business courtesies that could be seen as an attempt to gain an unfair advantage.
- Any gifts or hospitality must be modest in value.
- All gifts or hospitality must be given for a legitimate business purpose.
- Exchanging cash or cash equivalents, such as gift cards, are never acceptable.
- Suppliers must never give business gifts or other things of value (such as expensive meals, travel expenses, or other business courtesies) to a party actively involved in a competitive bidding process.

## Conflicts of Interest

At Lincoln Electric, we make decisions based on merit, fairness, and the best interest of the company, rather than personal relationships or financial gain. We expect our team members and our Suppliers to avoid conflicts of interest. Even the appearance of a conflict of interest can undermine trust, so Suppliers must be transparent and avoid situations that could compromise their objectivity.

- Suppliers must disclose any actual or potential conflicts of interest.

### Conflicts of Interest (cont)

- Relationships between Lincoln Electric employees and employees of Suppliers are particularly tricky. Suppliers must proactively disclose any time a Supplier's employee, or their family member has a relationship with a Lincoln Electric employee that might impact the Supplier's business.
- Similarly, Suppliers must disclose when any Lincoln Electric employee or their family member has an interest in the Supplier's business.

## Competing Fairly

Lincoln Electric believes in competing fairly and winning business based on the strengths of our products and services. We promote fair and full competition and never use unethical or illegal practices, such as false advertising, criticism of our competitors, or a misstatement of facts to earn business and expect our Suppliers to compete in the same manner.

- Suppliers must not engage in price fixing, bid rigging, market allocation, collusive bidding, boycotts, or any other practice that restricts fair competition.
- Suppliers should make independent decisions about pricing, customers, and markets without coordinating with competitors.
- Suppliers must understand and follow the competition laws that apply to their business and seek guidance when needed

## Protecting Confidential Information

Lincoln Electric takes the protection of confidential information seriously and expects the same from our Suppliers. Information shared while doing business must be safeguarded and used only for its intended purpose. Respecting confidentiality is essential to building trust and protecting the integrity of our operations.



- Suppliers must act responsibly when handling Lincoln Electric's confidential information, including proprietary and business information.
- Suppliers must maintain the confidentiality of Lincoln Electric's trade secrets and other intellectual property and only use our brand names and trademarks when they have received written permission to do so.
- Suppliers must use data and technology, including Artificial Intelligence (AI), responsibly, with a focus on transparency, privacy, and security. They must not use unauthorized tools or systems that could put confidential information at risk.
- Suppliers must test and monitor AI-based tools to ensure accuracy and protection of confidential information. They are also expected to document the outcomes of these efforts to demonstrate responsible AI use and compliance with Lincoln Electric's standards.

# Lincoln Electric Partners Speak Up When Necessary

At Lincoln Electric, we believe that everyone is responsible for speaking up if they notice a problem.

If you believe or suspect a Lincoln Electric employee or Supplier is violating applicable laws or this Code of Conduct, you have a responsibility to report your concerns through Lincoln Electric's Compliance Hotline.

Our Compliance Hotline permits anonymous reports in all countries where such reports are permitted. Lincoln Electric will not allow retaliation against employees or Suppliers for reporting violations or suspected violations in good faith.

Our Compliance Hotline can be found at <https://lincolnelectric.ethicspoint.com>.

Suppliers are expected to cooperate with reasonable assessment or audit processes if and when requested by Lincoln Electric.

We reserve the right to terminate any agreement with any Supplier that cannot demonstrate compliance with the Supplier Code of Conduct.



## Working Together to Meet High Standards

Please remember, we are here to partner with you. If you have any questions or feedback about this Code, or need assistance building your ethics and compliance program, please contact your Lincoln Electric Compliance Team at [Lincoln\\_Compliance@lincolnelectric.com](mailto:Lincoln_Compliance@lincolnelectric.com).

