

# TRADITIONAL VALUES DRIVING BUSINESS RESULTS

THE LINCOLN ELECTRIC CODE OF CORPORATE CONDUCT AND ETHICS



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## A MESSAGE FROM OUR CEO

### Dear Colleagues,

As an organization that has been in operation for more than 120 years, we are proud of our heritage and inspired by the efforts of all those who came before us. We've endured in the face of technological shifts, economic downturns and cultural upheavals. Our Company has moved quickly in the face of each challenge, as many companies do, but what makes us special is that over the years, we have always insisted on the highest standards of ethical conduct.

Our commitment to integrity has helped sustain our Company for over twelve decades. It's protected our reputation, protected our Company and, in turn, protected you, a member of our Lincoln Electric family. To continue our success in the decades ahead, we must all recognize that this protection comes with responsibility.

Our Code of Corporate Conduct and Ethics ("Code") is a resource to help you meet your responsibility. We each must follow the Code. It applies to everyone, at every level of the Company, at every affiliate and joint venture globally and to those who work on the Company's behalf. This Code is a great resource. But, it is not your only resource. Use good judgment. Refer to Company policies and remember that you can always ask for help. We will also require that you certify to the Code annually.

If you are a business partner, we also expect you to maintain high standards of ethical conduct. Certain business partners will be asked to periodically certify compliance with laws.

With your participation, I am confident that we will protect the assets that have enabled us to succeed for over a century. Help us maintain our high standards so we succeed for another century and beyond. Do so by ending each day knowing you have done the right thing. Your Company and your colleagues will thank you for it.

Sincerely,

**Christopher L. Mapes**

Chairman, President and Chief Executive Officer  
Lincoln Electric Holdings, Inc.



## OUR VISION AND VALUES

Our founders, John and James Lincoln, were true visionaries. John Lincoln started our multibillion dollar Company with \$200 and an idea. And James Lincoln started the incentive management principles that we still have in place today.

We continue to rely on the vision and values of our founders because it motivates all of us to maintain our status as a recognized industry leader. Keep our vision and values close and use them to shape the decisions you make each day.

### VISION

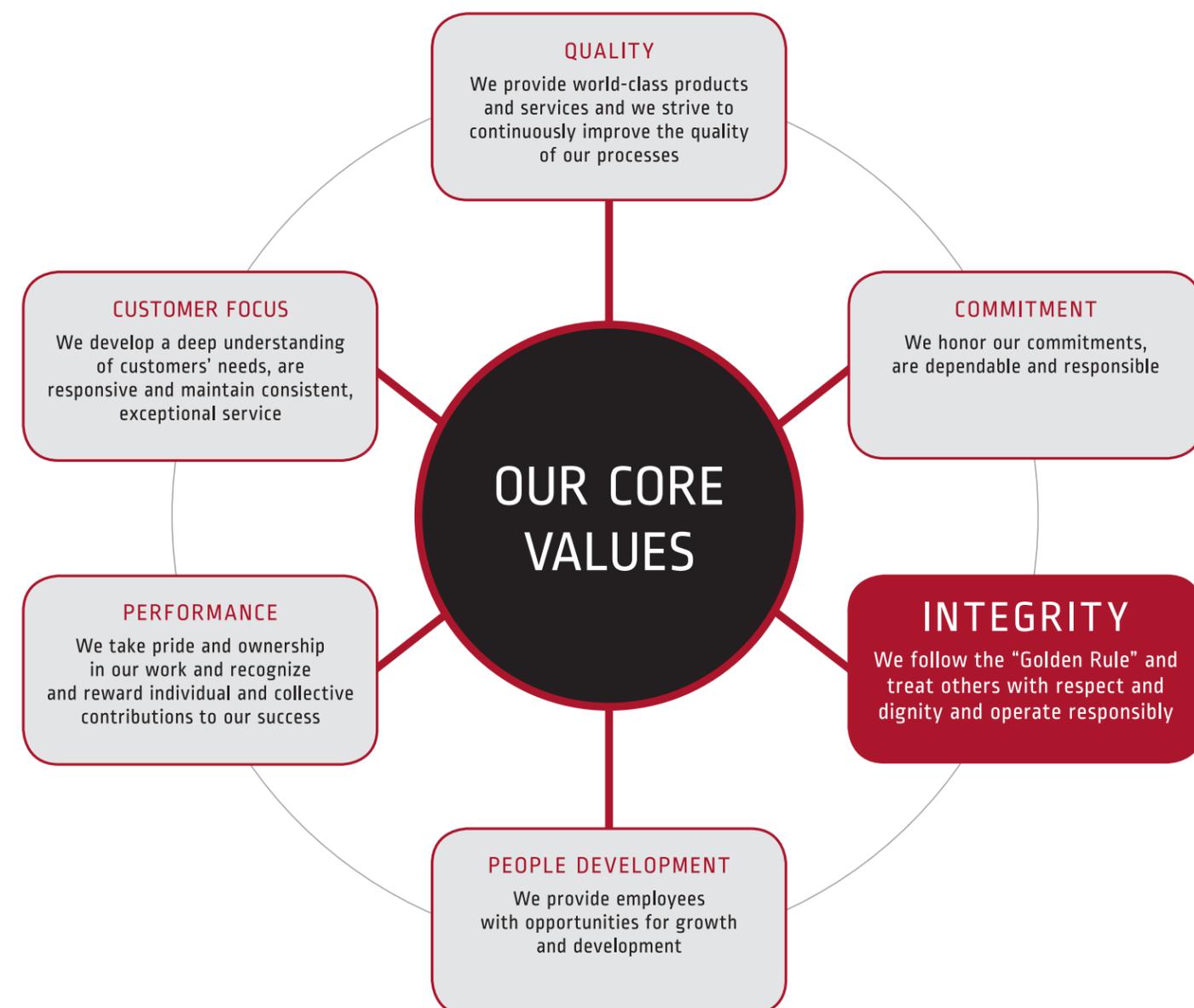


Lincoln Electric is a global manufacturer and the market leader of the highest quality welding, cutting and joining products. We are customer-focused and seek to develop innovative technologies and solutions that make our customers more productive and successful. We distinguish ourselves through an unwavering commitment to our employees, superior service to our customers and a relentless drive to maximize shareholder value.

### CULTURE



Since 1895 we have been fostering a culture of integrity and honesty – our core value representing the foundation for other values essential to our business, our growth and our success. We treat others as we would like to be treated: with respect, fairness and honesty. As a company, we consider the impact of our actions and conduct socially and environmentally responsible business.



# MAKING GOOD DECISIONS

If you ever feel unsure about what the right decision is, start by asking yourself the following questions:



**IS IT LEGAL?**

**NO / MAYBE  
DON'T DO IT!**

**YES**



**IS IT IN LINE WITH  
COMPANY POLICY?**

**NO / MAYBE  
DON'T DO IT!**

**YES**



**WOULD IT BENEFIT  
LINCOLN ELECTRIC AND  
MY FELLOW EMPLOYEES?**

**YES**

**NO / MAYBE  
DON'T DO IT!**



**WOULD I BE PROUD IF MY  
ACTIONS WERE PUBLICIZED  
ON SOCIAL MEDIA?**

**YES**

**NO / MAYBE  
DON'T DO IT!**

**DO IT!**



**IF YOU ANSWER "NO" OR EVEN "MAYBE" TO ANY OF THESE QUESTIONS, STOP. DO NOT ACT UNTIL GETTING ADVICE FROM YOUR SUPERVISOR OR OTHER COMPANY RESOURCE.**

If a local law or custom ever conflicts with the Code, always apply the higher standard of ethical behavior. If you are confused as to what the higher standard is, ask for guidance. The consequences for violating the Code can be severe. They may include anything from written or verbal warnings, to probationary periods, termination, civil liability or even criminal charges. Refer to the Code often to help prevent such penalties.

## SPEAKING UP

As an integral part of the Lincoln Electric family, you have an important role. Any time something does not seem to follow our Code, policies and procedures, or laws and regulations, share your concerns. Even if you are not sure, speaking up is always the right thing to do. We have a duty to protect each other and a duty to maintain the integrity of Lincoln Electric. Speaking up is the best way to do that.

### WHEN TO SPEAK UP

#### SHARE YOUR CONCERNS WHENEVER YOU SUSPECT VIOLATIONS OF:



- Lincoln Electric's Code
- Lincoln Electric's policies and procedures
- Laws and regulations

### HOW TO SPEAK UP



#### TELL YOUR SUPERVISOR OR ANOTHER COMPANY MANAGER.

If telling your supervisor or another Company manager feels inappropriate or ineffective, then you may always contact the Compliance Team.



#### CONTACT THE COMPLIANCE HOTLINE.

If you prefer a confidential means of communication, please submit your concern through the [Compliance Hotline](http://www.lincolnelectric.ethicspoint.com) (www.lincolnelectric.ethicspoint.com). It is available 24 hours a day, seven days a week. You may also call the local Hotline number posted at your facility. Toll-free numbers for various countries can also be found in the Appendix A, located under the Hotline tab of the Code of Conduct page on GlobalLinc.

Note that in certain countries, the Compliance Hotline may only accept reports that relate to specific types of conduct (for example, financial, accounting, auditing or bribery matters). If you contact the Hotline about a matter that should be handled locally in accordance with local legal requirements, the Compliance Hotline representatives will direct you to the appropriate resource.

### SPEAK UP WITHOUT RETALIATION

We have a culture of speaking up and we want to do everything we can to protect our culture. That is why we do not tolerate retaliation against anyone who comes forward with a concern.





# BUILD POSITIVE RELATIONSHIPS

“THE GOLDEN RULE – TREATING OTHERS AS YOU WANT TO BE TREATED – IS REALLY SIMPLE. AND THAT CODE OF ETHICS IS WHAT’S AT THE HEART OF SUCCESSFUL ORGANIZATIONS.”

**DAVID C. LINCOLN, SON OF J.C. LINCOLN**

DIVERSITY AND INCLUSION

HARASSMENT-FREE WORKPLACE

CREATING A HEALTHY, SAFE AND SECURE WORKPLACE

RESPECTING THE INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION OF OTHERS



## DIVERSITY AND INCLUSION

**GOOD FOR BUSINESS:** Diversity drives business results because it addresses the increasingly interconnected, globalized world that we serve. It also provides a rich mixture of talent, ideas, opinions and experiences.

We do not discriminate against anyone based on race, color, gender, national origin, age, religion, citizenship status, disability, medical condition, sexual orientation, gender identity, veteran status, marital status or any other characteristics protected by law.

### WE ARE COMMITTED TO CREATING A DIVERSE WORKFORCE.

We seek to promote diversity in its many forms and are committed to equal opportunity and fair treatment. We also do not tolerate retaliation against anyone who reports discriminatory behavior.

#### DO YOUR PART:

- Practice fairness in all aspects of your job.
- Celebrate diversity and challenge yourself to learn from different points of view.
- Make decisions about hiring, training, promotions, pay, benefits and other employment related practices based on merit.

 **Find out more**, see your local Human Resources department.

#### OUR VALUES IN PRACTICE:

**Q:** I am drafting a job advertisement for a position that just opened up. Right now, it says that selected applicants should be “young and energetic” as they will have to “stand for long periods of time and lift 30-50 pounds”. Should I change any of the language?

**A:** Yes. The current language indicates a preference based on age. Take out the words “young” and “energetic”, so that you encourage all qualified applicants to apply.



## HARASSMENT-FREE WORKPLACE

**GOOD FOR BUSINESS:** A respectful workplace is good for individuals and drives business results. When we work in an environment where everyone feels valued, we all feel more connected to the Company and committed to our vision and values.

### WE HAVE ZERO TOLERANCE FOR HARASSMENT

Do your part to prevent harassment by treating co-workers with respect. Use care in your interactions and avoid behavior that is harassing, threatening, bullying or abusive. Speak up for others if you witness any form of harassment against them, knowing that we will not permit retaliation against anyone who reports a concern.

#### DO YOUR PART:

- Work to maintain a workplace free of harassment (including sexual harassment), bullying and abusive conduct.
- Respect the personal beliefs, cultures and values of every individual. Listen and be receptive to different backgrounds and points of view.

 **Find out more**, see your local Human Resources department.

#### OUR VALUES IN PRACTICE:

**Q:** A coworker's wife often comes to the office to bring him lunch. I've noticed that when she leaves, one of our suppliers makes remarks about her body. She is not an employee, but it's still wrong. Should I say something?

**A:** Yes. Regardless of her employment status with Lincoln Electric, the comments made do not create a respectful work environment. If you are comfortable doing so, ask the supplier to stop. If you prefer, submit your concern to your manager or contact the Compliance Team.





## CREATING A HEALTHY, SAFE AND SECURE WORKPLACE

**GOOD FOR BUSINESS:** 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.

### WE PROTECT EACH OTHER, OUR CUSTOMERS AND THE ENVIRONMENT

We comply with all relevant legal requirements regarding health, safety and security. Safety isn't the job of one person or one department. It's everyone's job and it requires our constant care and attention.

Follow safety and security rules for your work area and tell your supervisor or someone in management about any environmental, safety or security hazards, so that corrective action can be taken.

Keep in mind that safety and security also means zero tolerance of violence or the abuse of drugs or alcohol, all of which can put you and others at risk. Let's work together to protect each other and promote a culture of safety.

#### OUR VALUES IN PRACTICE:

**Q:** There's a test I run that takes a lot of time, but the assembly that I test has never failed. In order to get my work done faster, may I skip the test for a few shifts?

**A:** No. Skipping the test could jeopardize the safety of our employees and customers and may even violate the law. Also, if a defective piece you failed to test leads to problems down the product line, it could cast doubt on your work and damage Lincoln Electric's reputation for quality and reliability.

#### DO YOUR PART:

- Know and comply with policies designed to promote health, safety and security. Complete all training requirements and only undertake work you are trained to do.
- Speak up about any personal injuries, property damage, suspected substance abuse, violent acts or threats, accidents, environmental contamination or suspected risks of contamination.

Find out more: [Environment, Health and Safety Policy](#)





## RESPECTING THE INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION OF OTHERS

**GOOD FOR BUSINESS:** Honoring the intellectual property and confidential information of others lets potential clients, customers and business partners know we are a company they can trust. This strengthens our business relationships, which in turn drives business results.

### WE HONOR THE WORK PRODUCT OF OTHERS

We have a responsibility to protect the intellectual property and confidential information of others. Never use or benefit from another's intellectual property or confidential information, unless you seek and obtain approval to do so.

### WHAT IS IT?

**“Intellectual property”:** a creative work or an original idea for a product or process. It includes copyrights, patents, trade secrets and trademarks.

**“Confidential information”:** information that is not known to the public that pertains to the business of a company or its subsidiary.

### DO YOUR PART:

- Get permission before making copies of someone else's work.
- Honor non-disclosure agreements and do not share the confidential information of others with any third party.
- Report any attempt to obtain another company's confidential information.

 Find out more: [Intellectual Property Community on GlobalInc](#)

### OUR VALUES IN PRACTICE:

**Q:** A friend from another company suggested a training video that was very helpful for his team. I'd like to show it to my team. May I borrow his video and make a copy?

**A:** No. Just like written materials, video materials are generally copyrighted. This means that they cannot be copied or, under some circumstances, even shown without permission. You must purchase your own legitimate copy of the video.



# CONSTRUCT FAIR DEALS

“HONESTY IS THE FIRST  
ESSENTIAL IN BUSINESS.”

**J.F. Lincoln**

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## DEALING FAIRLY WITH THIRD PARTIES

**GOOD FOR BUSINESS:** Dealing fairly with third parties builds credibility and drives business results. Others recognize us as a dependable company that's worthy of trust, which increases our customer loyalty.



### WE CONDUCT BUSINESS LEGALLY AND ETHICALLY

Maintaining our reputation requires transparency in dealing with third parties, particularly, when making payments to representatives, consultants or distributors. If, in the course of your job, you find yourself contracting with third parties, make sure that all contracts are in writing and that they clearly and accurately describe the terms of the agreement.

Additionally, make sure all payments are commercially reasonable. Excessive payments for services rendered or excessive discounts to distributors could at times violate the law and could result in severe penalties.

#### WHAT IS IT?

**“Third Party”:** Any person or entity involved in a transaction that is not the main buyer or seller. Examples of third parties include representatives, consultants, distributors and agents.

#### DO YOUR PART:

- In contracting with representatives, consultants or distributors make sure the following are included in your agreements:
  - The services to be performed
  - The basis for earning the commission or fee involved
  - The applicable rate or fee
  - Compliance with legal clauses
- Make sure payments are reasonable in amount.

#### Find out more:

[Distributor-Agent Policy](#)  
[Vendor Policy](#)

#### OUR VALUES IN PRACTICE:

**Q:** A local agent in an emerging market country told me that he is well connected to a potential customer. He said that business in his country is done informally on a trust basis through verbal agreements and that cash is always the expected form of payment. May I work with him to gain new business in this market?

**A:** Maybe, but only if he agrees to sign and abide by a written agreement with Lincoln Electric specifying the terms of engagement, a suitable rate and proper method of payment (not cash). Check with the Compliance Team if you have further questions or concerns.

## ANTI-CORRUPTION

**GOOD FOR BUSINESS:** Anti-corruption practices drive business results because corrupt behavior does not create a sustainable advantage; quality product and good service do. Additionally, corruption harms business because of regulatory fines, loss of reputation and negative effects on employee morale.



### WE WORK WITH HONESTY AND INTEGRITY

It's common knowledge that corruption of anyone, at any organization, at any level is wrong. However, what's not always known are the many acts and gestures that could be considered corrupt behavior.

Pay attention to any situation where someone offers anything of value in exchange for favorable treatment. Even socially accepted behaviors such as fancy dinners, job offers, training, travel and gratuities, may be considered bribes if offered to obtain business, maintain business or gain an improper advantage. As a valued employee of Lincoln Electric, neither you, nor members of your family, may offer or accept a bribe in exchange for a business decision. You must avoid any behavior that could even appear to be a bribe.

Keep in mind that some countries impose bigger penalties for bribing certain individuals or groups, particularly government officials, political candidates or political parties. All payments to customer representatives at government-owned enterprises are strictly prohibited.

#### DO YOUR PART:

- Recognize corrupt behavior or bribes. They come in many forms – cash, gifts, favors and even loans or job offers could be considered bribes if they are offered in exchange for a business decision.
- Before offering anything of value, check our policies and ask about what's allowed.
- Accurately record all payments in Lincoln Electric's financial books.
- Never attempt to circumvent Lincoln Electric's internal controls.

#### Find out more:

[Anti-corruption Policy](#)  
[Distributor-Agent Policy](#)  
[Vendor Policy](#)

#### OUR VALUES IN PRACTICE:

**Q:** I plan on taking some foreign government officials out to lunch in order to talk about a business deal. Is this allowed?

**A:** A reasonable cost for a normal business lunch meeting may be allowed, but this action is subject to pre-approval by one of your Regional Compliance Coordinators. Note that often times government officials in many countries are prohibited from accepting anything of value, including lunch.

## PROMOTING FAIR COMPETITION PRACTICES

**GOOD FOR BUSINESS:** Fair competition drives business results because it encourages us to continually get better. This leads to innovation, improved customer service and better insight into industry trends and advancements.



### WE BELIEVE IN FAIR COMPETITION

Lincoln Electric is committed to compliance with laws that promote full and fair competition. Be careful in all situations where there is potential for a violation of fair competition laws. Avoid collaboration – or even the appearance of agreement – with competitors.

In seeking information about competitors, make sure you go to legitimate sources, such as the trade press, customers or distributors. Never attempt to acquire such information unfairly or illegally.



#### DO YOUR PART:

- Never collaborate, enter an agreement or even talk about pricing, production, marketing, inventories, product development, sales territories, goals or other proprietary or confidential information with a competitor.
- Never engage in illegal or improper acts to get access to a competitor's trade secrets, customer lists, financial data or similar information.
- Know our competition policies and guidelines and ask questions about any issues or concerns.

Find out more:  
[Anti-trust Policy](#)

#### OUR VALUES IN PRACTICE:

**Q:** At an industry conference, I was having lunch with a group of sales representatives from several competitors. One of them suggested that “we’d all do better if we divided up the territories.” Is this a good idea?

**A:** No. This suggests market division, which can be a violation of fair competition laws. You should excuse yourself in a way that leaves no doubt about your objection to the discussion. Also, you should provide a written account of the incident to your supervisor and a member of the Legal Department as soon as possible.

## INSIDER TRADING

**GOOD FOR BUSINESS:** Upholding insider trading laws drives business results because it helps us maximize shareholder value. If insider trading was allowed, many investors would feel that they couldn't participate in the markets without getting cheated – encouraging them to not invest at all.



### WE DO NOT TRADE ON INSIDE INFORMATION

If you have “inside information” about Lincoln Electric or about companies with which Lincoln Electric deals, you may not buy or sell stock or engage in any other action to take advantage of that information.

You also may not tip off others, such as friends and family, so that they can take advantage of that information.

Depending on your job, you may need clearance before making *any* trades involving Lincoln Electric or companies with which Lincoln Electric deals.

### WHAT IS IT?

**“Inside Information”:** Information that has not been released to the public that could affect the value of a stock or other security. Examples include nonpublic details about:

- Mergers or acquisitions
- Sales or earnings results
- Financial forecasts
- Changes to the executive management team
- Pending lawsuits
- Major wins or losses of customer business
- Significant Research and Development advances or setbacks

### DO YOUR PART:

- Make sure you understand the definition of “inside information.”
- Do not trade on inside information and do not tip off others so they may trade.
- Familiarize yourself with Lincoln Electric's Securities Trading Policy.
- If you have any remaining questions, contact the Compliance Team.

### OUR VALUES IN PRACTICE:

**Q:** I heard from a coworker on the accounting team that Lincoln Electric may set a new financial record this quarter. May I let a friend know about it as a potential investment opportunity? He could really use the money.

**A:** No. This financial forecast is considered inside information because it's information that hasn't been released to the public but, if known, might influence someone to buy or sell our stock. If your friend learns of the information from you then acts on it, you both could get into serious legal trouble.

# CONFLICTS OF INTEREST

**GOOD FOR BUSINESS:** Avoiding conflicts of interest drives business results because it puts the sole focus on our customers. A strong customer base positions us well for future growth.

## WE DO NOT LET PERSONAL INTERESTS INTERFERE WITH OUR JOB

There are numerous situations that could present a conflict of interest, but generally a conflict of interest happens when you engage in outside interests or activities that could interfere with the interests of your job. As a Lincoln Electric employee, you have a duty to avoid such situations, or even the appearance of them.

Review our policies and make sure you are able to identify potential conflicts. If you suspect you may have a conflict of interest, disclose it immediately to your supervisor and, if necessary, obtain approval from the Compliance Team.

## MAKING GOOD DECISIONS

If you are unsure whether an activity would be considered a conflict of interest, ask yourself the following questions:

 **ARE YOU CONSIDERING A PRIVATE ACTION THAT COULD INTERFERE WITH THE DECISIONS YOU MAKE AT WORK?**

 **COULD AN ON-THE-JOB DECISION BENEFIT YOUR PERSONAL FINANCIAL INTERESTS?**

 **COULD AN ON-THE-JOB DECISION FAVOR YOU, A CLOSE FRIEND OR A FAMILY MEMBER?**

 **COULD AN ACTION APPEAR TO BE A CONFLICT TO SOMEONE ELSE?**

If you answered **YES** to any of these questions **DISCLOSE!**

YES? / NO?

If you answered **NO** to all of the questions proceed with caution. If you are still unsure, you should promptly disclose the situation.

### DO YOUR PART:

- Know the kinds of situations where conflicts typically arise.
- Remember, it's not possible to list every potential conflict of interest scenario; if you are not sure if a situation represents a conflict, ask.
- Disclose any actual or potential conflicts of interests or even situations that could suggest the appearance of a conflict.

### OUR VALUES IN PRACTICE:

**Q:** I have a second job that requires regular phone follow-up with my customers. Occasionally, I make calls or send emails to those customers from my desk at Lincoln Electric. Since I do this work only during my breaks, is it acceptable?

**A:** No. While it may be acceptable to use Lincoln Electric resources, including email and telephones for incidental personal purposes, e.g. a quick call to a friend to make lunch plans, it is never permissible to use our Company's telephone or email system to do work for an outside job.



## DOING BUSINESS GLOBALLY

**GOOD FOR BUSINESS:** Working globally drives business results because it provides exciting new opportunities for growth and profit. It also stabilizes our Company by providing a more diverse market base.



### WE RESPECT INTERNATIONAL REGULATIONS

Doing business globally requires us to comply with the laws of the countries in which we operate. If conflicts arise, contact the Compliance Team with questions.

For instance, taxing authorities of various countries regulate our ability to set prices. So when pricing goods, especially between our foreign and domestic operations (or “transfer pricing”), use the appropriate legal standards.

Comply faithfully with export and import regulations. You must properly identify, classify and value all goods and materials leaving or entering any country.



#### DO YOUR PART:

- Ensure that anything intended for import or export is properly classified in advance, based on the country of origin, the destination, the end use and the end user – take care to secure all required documentation, labeling, licensing, permits and approvals.
- Do not conduct business with countries that are subject to trade embargoes or economic sanctions.
- Do not participate in boycotts that the United States does not support. If you receive requests to comply with a boycott (or requests to supply boycott-related information), contact the Compliance Team.

**Find out more:**  
[Export Policy](#)

#### OUR VALUES IN PRACTICE:

**Q:** An international customer refuses to provide full information about a product’s end-user which I need in order to comply with the export regulations in my country. May I proceed without this information?

**A:** No. Explain to the customer that this information is needed to meet export control regulations. If you cannot obtain this information from the customer, then contact the Compliance Team for assistance.

## DOING BUSINESS WITH GOVERNMENTS

**GOOD FOR BUSINESS:** Government contracts drive business results because they broaden our consumer base, while allowing us the privilege of serving the public interest.



### WE TAKE CARE IN OUR DEALINGS WITH GOVERNMENTS

We are fortunate to produce products that are found useful by various federal, state and local government agencies around the world. Requirements under government contracts are often more strict than those of other contracts. Therefore it is important that you comply with all requirements and cooperate with any necessary government inspection, investigation or request for information. If you have any questions regarding government requirements, please contact the Compliance Team.

Additionally, sometimes our products require modifications for government purposes. In the event that we sell modified products to a government or government contractor, like a military end-user, make sure that regulations specific to that contract and applicable export laws are followed.

If you have questions about these regulations, or if you have questions about contracting with government agencies in general, ask for guidance.

#### DO YOUR PART:

- Know and follow the unique legal requirements, restrictions, and pricing that relate to your government contract.
- Protect any government property and classified information entrusted to you.
- Speak up if you believe that our government contracts could be at risk in any way.
- Direct questions to the Compliance Team.

#### OUR VALUES IN PRACTICE:

**Q:** I recently attended a trade show where I was approached by a military buyer. She seemed to think many of our products would be a perfect fit in the development of a new military base. It sounds like little or no modifications would be needed. Would I still be able to use the standard commercial agreement we always use?

**A:** No. The laws and regulations governing contracts with government entities impose requirements not traditionally associated with purely commercial business transactions. If you have questions regarding contract-related dealings, direct them to the Compliance Team.



# FORM EFFECTIVE SYSTEMS

“INDIVIDUAL RESPONSIBILITY IS ESSENTIAL TO STRENGTH.”

J.F. Lincoln

USING AND PROTECTING COMPANY ASSETS

KEEPING ACCURATE BOOKS AND RECORDS

MONEY LAUNDERING

## USING AND PROTECTING COMPANY ASSETS

**GOOD FOR BUSINESS:** Protecting Company assets drives business results by adding to our market value, generating revenue streams and giving us a competitive advantage in negotiations. When our assets are protected, so are we.



### WE SAFEGUARD OUR COMPANY

Safeguarding Company assets is essential to our success. We protect everything that our Company owns or uses to conduct business, including:

#### PHYSICAL AND ELECTRONIC ASSETS

- Buildings, furniture and equipment
- Tools and inventory
- Hardware and software
- Phones and computers
- Email and Internet

#### INTELLECTUAL ASSETS

- Trade secrets and trademarks
- Patents and copyrights
- Business plans and engineering ideas
- Databases and customer lists

Protect our property, systems and information by helping to prevent damage, theft, loss, waste and improper use.

#### DO YOUR PART:

- Use electronic assets appropriately and in compliance with our policies.
- Report any physical property or equipment that is damaged, unsafe or in need of repair.
- Do not lend, sell or give away anything without authorization.
- Follow security procedures and speak up about any theft, loss or security breach.
- Keep confidential assets secure to prevent disclosure. Do not discuss research or other intellectual property with anyone unless there is a legitimate business reason for doing so.

#### Find out more:

- [Acceptable Use Policy](#)
- [Access Control Policy](#)

#### OUR VALUES IN PRACTICE:

**Q:** I believe very strongly in a particular political movement. May I use my Lincoln Electric email to urge my friends and co-workers to support the movement?

**A:** Generally, no. Lincoln Electric encourages your personal participation in civic affairs, but it is not appropriate to use Company resources for political, religious or other similar types of activities of a personal nature. We do permit the use of Company resources to support charitable organizations when approved by appropriate Compliance personnel or management.

## KEEPING ACCURATE BOOKS AND RECORDS

**GOOD FOR BUSINESS:** Keeping accurate books and records drives business results because it inspires trust amongst customers, investors and business partners. And, trust is what drives our long-term success.

### WE HONESTLY REPRESENT OUR COSTS, EXPENSES AND EARNINGS

Each of us has a duty to follow all internal controls in recording and maintaining Company books and records. Ensure that our records and reports accurately reflect the true nature of all transactions, whether they are major expenditures or small reimbursements. Cooperate with internal and external auditors and report any concerns to the Compliance Team.



#### DO YOUR PART:

- Do not create any undisclosed or unrecorded funds or assets.
- Never misreport or mischaracterize information that relates to our business.
- Follow our internal processes and controls to ensure our records accurately and fairly reflect all transactions.
- If you are ever unsure about any accounting or tax matter, ask for guidance.

**Find out more:**  
Corporate Control and Accounting

#### OUR VALUES IN PRACTICE:

**Q:** While out of town on business, I treated a friend to dinner at a moderately priced local restaurant. The bill was more than a typical meal for one person, but not lavish. Is it alright to file an expense report to be reimbursed for this dinner-for-two?

**A:** No. The Company will reimburse your dinner expense, but not dinner for your friend. Putting this information on your expense report is dishonest and you should not do it.



## MONEY LAUNDERING

**GOOD FOR BUSINESS:** Preventing money laundering drives business results because it reduces risk. It would not be wise to jeopardize both our values and our Company by funding operations in illegal, illicit or immoral ways.



### WE ONLY DO BUSINESS WITH THOSE WHO OPERATE LEGALLY

Money laundering encourages criminal activity because it gives criminals a chance to spend ill-gotten profit without potential discovery. This can damage our Company, our economy and society as a whole.

To avoid such damage, we all must take our commitment to anti-money laundering laws and currency reporting requirements seriously.



#### DO YOUR PART:

- Do not do business with any person or company known or suspected to be involved in criminal activity.
- Accurately and honestly report transactions.
- Know your customer and their practices.
- Refer suspicious activity to the Compliance Team.

#### OUR VALUES IN PRACTICE:

**Q:** We have a very loyal customer that recently began insisting on making all-cash payments while simultaneously increasing his purchase orders. We have such a great business relationship, that I do not want to disturb it by telling him no. Would it be okay to accept the cash payments for just this one client?

**A:** No. There are many red flags that help detect money laundering and all-cash payments is one of them, particularly when the payments are higher than anticipated. Since it may be difficult to verify the source of his additional currency, you should consider the request suspicious activity. If he insists after you tell him no, report it to the Compliance Team immediately.



# MAKE AN IMPACT

“IN THE FINAL ANALYSIS, ALL PEOPLE ON EARTH ARE ON ONE TEAM. WHAT HELPS OTHERS WILL ALSO HELP US.”

**J.F. Lincoln**

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COMMUNICATIONS WITH THE MEDIA AND THE PUBLIC

## HUMAN RIGHTS

**GOOD FOR BUSINESS:** There is an obvious moral imperative to uphold human rights. Additionally, respecting human rights can also be good for business. Upholding human rights protects the rights of our employees and other workers, which creates a productive and stable workforce. It fosters compliance with local and international laws, which makes it easier for us to operate globally. And it satisfies consumer concerns about human rights abuses, which protects our image to the public.



### WE RESPECT AND PROTECT THE HUMAN RIGHTS OF EVERY INDIVIDUAL

As a company, 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.

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 in 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 Company or its supply chain. And we will monitor the use and sourcing of conflict minerals that could potentially fund illegal armed groups attempting to destabilize democratically elected governments.



#### DO YOUR PART:

- Treat all persons with dignity and respect.
- Do not engage in or tolerate human rights abuse, slavery, human trafficking or unlawful child labor or conduct business with those who do.
- Submit any questions regarding the conflict mineral status of any Lincoln Electric product to [conflictminerals@lincolnelectric.com](mailto:conflictminerals@lincolnelectric.com) or your local Lincoln Electric sales office.

**Find out more:** To learn more about the steps we are taking, see our Statement on Conflict Minerals Community.

## CORPORATE SOCIAL RESPONSIBILITY

**GOOD FOR BUSINESS:** Corporate responsibility is corporate sustainability. It's important for Lincoln Electric to give back because such practices are good for society and for business.

### WE INTEGRATE SOCIAL RESPONSIBILITY INTO ALL ASPECTS OF BUSINESS

Through volunteering, environmental efforts, philanthropy and ethical labor practices, we integrate social responsibility into all aspects of our business. This helps us make a real impact in the world while earning the trust of our consumers.

### CHARITABLE CONTRIBUTIONS

The Company provides grants to qualified non-profit organizations through the Lincoln Electric Foundation, which is a private 501(c)(3) foundation. In addition, in-kind donations and sponsorships are provided by the Company.

#### DO YOUR PART:

- Find ways to reduce your carbon footprint.
- Feel encouraged to participate in Company-sponsored charitable programs and speak up if you have charitable ideas of your own.
- Treat coworkers fairly and ethically and pay special attention to any foreign cultures or labor laws that govern other individuals with which we do business.

#### Find out more:

Corporate Environmental  
Health and Safety Community

#### OUR VALUES IN PRACTICE:

**Q:** I am organizing a fundraiser that is gaining more traction than I ever thought it would. I found the perfect banquet hall to house the event. Would it be okay to organize an initial fundraiser within our Company in order to put up the money for the banquet hall?

**A:** Probably not. Although this may be an opportunity to support a cause you strongly believe in, it is not appropriate to use Company time or resources for such purposes without prior approval. Speak with your supervisor or the Compliance Team to find out how Lincoln Electric may be able to support your endeavor.



## POLITICAL ACTIVITIES AND CONTRIBUTIONS

**GOOD FOR BUSINESS:** We encourage employees to support community service causes they are passionate about in their spare time. The more productive we feel in our personal lives, the more we feel we have to offer on the job – which drives business results.



### POLITICAL ACTIVITIES

Lincoln Electric is non-partisan and does not contribute corporate funds for political candidates or committees and does not have an employee PAC program.

### WE ENCOURAGE YOU TO USE YOUR VOICE

We are deeply committed to community service. However, it is important to keep in mind that our personal commitments must remain separate from our work at Lincoln Electric. You are prohibited from using Company resources for personal political activities.

#### DO YOUR PART:

- Never use Lincoln Electric resources, e.g. time, money, email, phone systems, personnel or Company premises, to engage in political activities.
- Do not use the Company name in any political activity without approval and make it clear that, when voicing your political opinions, you are speaking for yourself.
- Ensure that your participation in political activities does not reflect unfavorably on the Company.

**Find out more:** Please contact the Compliance Team with any questions you may have.

#### OUR VALUES IN PRACTICE:

**Q:** Yesterday, my supervisor asked for donations to a charity that rescues stray dogs. Although he said that the contributions were voluntary, I felt pressured to donate money. I heard that he works for that organization in his spare time and that he gives better work assignments to those who share his point of view. What can I do about this?

**A:** It would be inappropriate for your supervisor to treat employees differently based on whether or not they donate to charitable organizations at his request. You should report his actions to the Compliance Team.

## COMMUNICATIONS WITH THE MEDIA AND THE PUBLIC

**GOOD FOR BUSINESS:** Controlling our communications with the media and the public ensures consistent messaging. This is good for business because it protects our brand and our reputation.

### WE PROTECT OUR REPUTATION

We only allow authorized people to speak on Lincoln Electric's behalf whether on or off the record, irrespective of the subject matter. When faced with a request for Company information by someone outside of Lincoln Electric, particularly members of the media, do not make an unauthorized statement or share internal information.



#### DO YOUR PART:

- Refer all requests for information to the CEO, CFO, VP of Investor Relations and Communications or other individuals specifically designated by the Company.
- Never share the Company's confidential information on social media, Internet newsgroups, chat boards or any other kind of website.

#### Find out more:

[Social Media Policy](#)  
[Corporate Disclosure Policy](#)

#### OUR VALUES IN PRACTICE:

**Q:** A reporter called to ask for a comment in connection with my work. I know the answer to her question. May I tell her what she wants to know?

**A:** No. You should not answer any questions from reporters unless you receive approval from the Company. If you have any questions about your response, you should contact the VP of Investor Relations and Communications.



## CLOSING THOUGHTS AND RESOURCES

Our values are at the very center of who we are, how we conduct business and what drives our success.

By reading this Code, you have already taken the first step in your commitment to uphold our values.

Take the next step by living our values and continuing to consult the Code to guide your everyday decisions.

Your continued support will contribute to an over 100-year old dual legacy that combines social values with commercial success.

If you need additional guidance, you are encouraged to reach out to your manager or any of the resources listed below.

### **CHIEF COMPLIANCE OFFICER**

[Tony\\_battle@lincolnelectric.com](mailto:Tony_battle@lincolnelectric.com)

### **GENERAL COUNSEL**

[Jennifer\\_ansberry@lincolnelectric.com](mailto:Jennifer_ansberry@lincolnelectric.com)

### **CHIEF HUMAN RESOURCES OFFICER**

[Gabe\\_bruno@lincolnelectric.com](mailto:Gabe_bruno@lincolnelectric.com)

### **SENIOR CORPORATE COMPLIANCE MANAGERS**

[Derek\\_moon@lincolnelectric.com](mailto:Derek_moon@lincolnelectric.com)  
[Danijela\\_bozic@lincolnelectric.com](mailto:Danijela_bozic@lincolnelectric.com)

### **COMPLIANCE TEAM**

[http://globallinc.lincolnelectric.com/  
global/EN/Our\\_Business/Codeof  
Conduct/Pages/default.aspx](http://globallinc.lincolnelectric.com/global/EN/Our_Business/CodeofConduct/Pages/default.aspx)

