

TIMKEN SUPPLIER CODE OF CONDUCT

The core values of The Timken Company – ethics & integrity, quality, teamwork and excellence – are the foundation of how we conduct business and the primary source of our enduring success as a company. We choose to work with suppliers who share these same values.

The Timken Supplier Code of Conduct addresses issues of particular importance in our global supply chain. It outlines the workplace standards and business practices that are consistent with our core values (www.Timken.com/Ethics) and our own employee code of conduct. We expect our suppliers around the world to adhere to this Code as we work together for mutual success.

A. Code of Conduct

- 1. General Principle:** Supplier shall operate in full compliance with the laws of their respective countries and with all other applicable laws, rules, and regulations.
- 2. Environment, Workplace Safety and Health:** Supplier must comply with all applicable environmental laws and regulations. Supplier shall provide and maintain safe and healthy plant and office working conditions and comply with all laws and regulations applicable to workplace safety and health.
- 3. Child Labor:** Supplier shall only employ workers who meet the applicable minimum legal age requirement. Suppliers must also comply with all other applicable child labor laws.
- 4. Forced Labor/Human Trafficking:** Supplier shall not use any involuntary or forced labor. Timken does not tolerate employment which confines the employee in unreasonable debt bondage, for example, through feecharging employment agencies.
- 5. Wages and Benefits:** Supplier must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.
- 6. Non-Discrimination:** Supplier shall treat all its employees and applicants equally according to their individual qualifications, abilities, experiences and other employment standards. There shall be no discrimination due to gender or gender identity, race, religion, color, national origin, ancestry, age, disability, sexual orientation, veteran/military status or any other basis protected by applicable law.
- 7. Gift and Gratuity Policy:** The offering, payment or acceptance of kickbacks, bribes or other illegal payments are prohibited and will not be tolerated. Also, Timken prohibits the offer or acceptance of any gifts or gratuities that the recipient reasonably would consider to be of substantial value. Any supplier that violates this policy risks immediate loss of all existing and future Timken business.
- 8. Antitrust and Competition Laws:** Supplier shall act in accordance with national and international competition laws and shall not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.
- 9. Intellectual Property Rights:** Supplier shall respect the intellectual property rights of Timken and others.
- 10. Data Privacy:** Supplier shall respect each person's right to the privacy of their personal information in compliance with global data protection regulations and shall report within 24 hours the discovery of any breach in the security of or unauthorized access to personal information related to Timken or any of its business partners.
- 11. Conflict Minerals:** To support our commitment to responsible sourcing, Supplier shall ensure that any products supplied to Timken do not contain conflict minerals which are from sources that directly or indirectly finance or benefit armed groups engaged in unlawful conflict in the regions in which they operate.

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B. Compliance Monitoring

Supplier will allow Timken and/or any of its representatives, agents or customers access to its facilities and all relevant records associated with the products and services provided to Timken. Supplier and Timken will establish a mutually agreeable date and time for access. However, risks to Timken's business may require immediate access to the products, services and associated records and supplier must accommodate Timken's access as required. Supplier must also provide Timken with additional information and certifications evidencing compliance, upon request by Timken.

C. Application to Sub-Contractors

This Code also applies to any sub-contractor(s) to the supplier, providing goods or services to the supplier. Supplier is fully responsible for ensuring compliance by any such sub-contractor(s) as if it were the supplier itself. Timken reserves the right to audit the supplier's sub-contractors for compliance to the Timken Supplier Code of Conduct and supplier will accommodate Timken's audit as required.

D. Event of Violation

Supplier shall notify Timken promptly of a known or anticipated breach of the code. If the supplier does not comply with the Timken Supplier Code of Conduct, Timken may immediately terminate or require that the supplier implement a corrective action plan to cure the non-compliance within a Timken-specified time period (furnished to Timken in writing). If the supplier fails to meet the corrective action plan commitment, Timken may terminate the business relationship, including suspending placement of future orders and potentially terminating current production. Timken reserves the right to hold supplier responsible for reasonable costs of investigating non-compliance.

E. Non-Compliance Reporting

The Timken Supplier Code of Conduct applies to people and companies ("Suppliers") that do business with Timken. Contact your Timken representative with any questions on the Code. Violations of the Timken Supplier Code of Conduct or any concern related to Timken may be confidentially reported through: www.timkenhelpline.com.

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