OUR VISION

Be the global leader in bearings and mechanical power transmission, continually improving performance, reliability and efficiency.

OUR VALUES

ETHICS AND INTEGRITY  QUALITY  TEAMWORK  EXCELLENCE
The core value of ethics and integrity stands as a cornerstone at The Timken Company and it underscores our commitment to always do the right thing. Integrity guides every action we take, every day, as we put Timken products, processes and know-how to work and help keep the world in motion.

As associates, we each have a responsibility to colleagues, customers and communities to uphold our company’s long-standing reputation of trust. Your personal commitment to always work with integrity means each interaction you have with a Timken stakeholder can further enhance our reputation.

As we drive to be stronger than ever, I encourage you to join me in ensuring that our everyday actions always reflect the very best the company has to offer.

Sincerely,

Richard G. Kyle
President & CEO
Timken customers, shareholders and colleagues expect our actions and decisions to always reflect our reputation of conducting business with ethics and integrity, which has been built over more than a century. Our commitment to doing the right thing makes this company special, and is at the heart of who we are as people.

The following Timken Standards of Business Ethics, our company’s code of conduct, serves as a guide for conducting business in a way that’s consistent with our values and reinforce our ethical commitments. It’s our job to make sure that our business decisions and actions comply at all times with the spirit as well as the letter of this policy and the law. While the Standards do not try to address every potential situation and dilemma, they are a valuable resource for providing direction when you have questions or concerns.

As a member of the Timken team, you play an important role in upholding our principles of honesty, fairness, respect and responsibility, and the company counts on you to speak up if you see anything that may compromise our high standards. If you believe unethical or questionable business activity or behavior is occurring, use our ethics reporting resources listed in this guide without fear of retaliation.

Today, I ask that you reaffirm your commitment to our core value of ethics and integrity in all that you do. The strength that our company draws from your commitment is monumental and enables us to continue to grow and prosper.

Thank you for joining me in turning ethics into action at The Timken Company.

Sincerely,

Michele K. Abraham
General Manager – Ethics & Compliance
SEE SOMETHING? SAY SOMETHING!
ETHICS REPORTING RESOURCES

*Turning Ethics into Action* applies to how we treat others, do our jobs and make decisions. It also means speaking up when you feel something is not right or when you have a question.

**Reporting Concerns and Seeking Guidance: Open Door Policy**

When you have a question or concern, speak first with a supervisor or manager with whom you feel comfortable. You also may speak with your local organizational advancement/human resources representative.

Our company’s open door policy reflects our expectation of supervisors and managers to listen and respond to questions and concerns. If you feel your concerns or questions have not received proper consideration, speak with higher levels of management.

To support us in *Turning Ethics into Action* in our jobs, the following ethics reporting resources are available for reporting concerns and seeking guidance:

- Your supervisor or manager
- Any company leader
- Organizational advancement/human resources
- Ethics and compliance office at ethics@timken.com
- Law department at lawcenter@timken.com
- Timken HelpLine (anonymously, if desired)
  1-800-846-5363 or at www.timkenhelpline.com

**When Should I Speak Up?**

At Timken, *Turning Ethics into Action* is everyone’s responsibility. To help protect our company’s values and reputation, speak up if something just doesn’t seem right. Not only is this expected, it is an accepted and protected behavior. It enables us to better uphold our values and fulfill our commitments to one another, our shareholders, customers, suppliers and the community.

Our *Standards of Business Ethics* address the most common legal and ethical issues you may encounter. However, not every situation can be addressed here. You should use your best judgment in each case. If you encounter something that conflicts with the standards set forth, or your own conscience, you should speak up.
When Should I Speak Up? Cont.

Examples of situations you should report:

- Questionable accounting or auditing matters
- Inappropriate gifts or gratuities
- Environmental, health or safety concerns
- Conflicts of interest
- Theft of company or personal property
- Discrimination or harassment
- Verbal or physical threats
- Product quality concerns
- Regulatory violations and insider trading

How Reports Are Handled

We investigate all reports promptly, thoroughly and fairly, and take appropriate action whenever necessary. We expect associates to participate in such an investigation when asked. Keep in mind that every effort is made to safeguard confidentiality both during and after the investigation.

Non-Retaliation Policy

You should never fear retaliation. Our company does not tolerate acts of retaliation for any legally protected activity against anyone who makes a good faith report. Making a report in "good faith" means that the information you provided is complete and accurate, and you believe it to be true. Retaliation against anyone who participates in investigations in good faith is also prohibited. Such acts may lead to disciplinary action against the person responsible for the retaliation, up to and including termination. If you believe you have experienced retaliation, report it to one of the available ethics reporting resources immediately. Anyone making a report not in good faith may also be subject to disciplinary action.

Remember, Timken’s reputation is in your hands. When in doubt, make the call.

Timken HelpLine

Our company recognizes that there may be times when you might be reluctant to discuss concerns or questions with your supervisor or manager. For this reason, the Timken HelpLine is available online and via telephone.

The Timken HelpLine is answered by an external third party. Reports made to the Timken HelpLine are not traced or recorded. We encourage you to report your concerns, sharing as much information as possible, including your name, so that we can conduct a thorough investigation. However, even if you are not comfortable sharing your name, your report is still valuable. Therefore, you may choose to submit it anonymously, where allowed by local law. If you do so, you will receive a reference number to check the status of your report. All reports remain confidential to the maximum extent possible and consistent with local law.

You may contact the Timken HelpLine by telephone or submit a report online at www.timkenhelpline.com. A list of phone numbers for the Timken HelpLine is available at the end of this policy.
TURNING ETHICS INTO ACTION
OUR STANDARDS OF BUSINESS ETHICS

Our Standards of Business Ethics are a framework for Turning Ethics into Action. For the purposes of this policy, “our company” or “Timken” refers to every part of the company. It includes all wholly owned entities and affiliates of The Timken Company.

Ethics and Integrity Defined
Turning Ethics into Action means that each of us must uphold the following principles, which define our core value of ethics and integrity:

**HONESTY**
We tell the truth. If we make a mistake, we do not try to hide it. We behave so that all of our stakeholders can rely on us to do what we say we will do. Whether preparing a financial report, responding to a question from auditors, talking to a customer or dealing with a supplier or other stakeholder, we are always truthful. We refrain from any conduct that is questionable on ethical grounds.

**FAIRNESS**
We buy and sell based on our business merits without unethical practices. We understand that Timken’s business interests, opportunities and information belong to our company and should only be used in Timken’s best interests. We avoid conflicts of interest. We always advance Timken’s legitimate business interests when the opportunity to do so arises.

**RESPECT**
We treat each other with dignity. We operate safely with environmental responsibility and respect our fellow associates, our suppliers, our customers and the communities where we operate.

**RESPONSIBILITY**
We are guardians of Timken’s outstanding reputation for ethics and integrity. We act responsibly, exercise sound judgment and do what is necessary to preserve and enhance that reputation. We do not wait for others to tell us what we need to do. We follow our Standards of Business Ethics and understand how the law affects our actions.
Who Is Responsible for Turning Ethics into Action?
All of us must act according to the principles set forth in our Standards of Business Ethics. We also expect everyone working on our company’s behalf, including consultants, agents, suppliers and business partners, to adhere to our ethical standards.

Associate Performance: Our Leadership Competencies
Our commitment to Turning Ethics into Action is reflected in our company’s leadership competencies model, which sets standards for associate performance. The behaviors associated with business ethics, integrity and trustworthiness are clearly identified at each level of the leadership pipeline as an element of the “Professional Impact” competency.
Resolving Ethical Dilemmas

When you face an ethical dilemma, ask yourself the following questions:

**KNOW THE FACTS**
- What are the facts?
- Who will be impacted by my decision?
- Do I have authority to make this decision on my own?

**ANALYZE**
- Is this the right thing to do?
- Does it comply with our Standards of Business Ethics? The law?
- Will my decision impact the company’s reputation?

**CONSIDER**
- Would I be embarrassed if my co-workers or family found out about this?
- Would I be embarrassed if this appeared in the news?

If after reviewing these questions, you are unsure of the best course of action, seek advice and guidance from our ethics reporting resources before proceeding.

**Q:** Hanna, a Timken analyst, works closely with Aaron, another associate. While Hanna and Aaron generally get along well, Aaron will occasionally crack a joke that Hanna thinks is offensive. She doesn’t want to harm their working relationship so she doesn’t say anything about the jokes. However, they have become more frequent and are starting to bother other associates as well. What should Hanna do?

**A:** First, Hanna should consider letting Aaron know that his jokes are hurtful and unprofessional. However, Hanna may not be comfortable speaking to Aaron directly – and that’s okay. She should raise the issue with Aaron’s supervisor instead, letting him or her know that Aaron’s behavior is affecting other associates. Hanna also can contact any of the ethics reporting resources for assistance. By speaking up, Hanna helps to keep Timken a respectful, ethical place to work.
At Timken, *Turning Ethics into Action* in our workplace means:

- We value diversity and diverse perspectives.
- We treat one another with professionalism, dignity and respect.
- We are honest.
- We behave as good corporate citizens.
- We protect the environment.
- We work safely.
- We protect the security and confidentiality of personally identifiable and company-confidential information.

**Equal Employment Opportunity and Global Inclusion**

Our company values a diverse, global workforce and an inclusive work environment that reflects our customers and communities. As associates, we represent a variety of backgrounds, education levels and thinking styles. Our diversity enhances our ability to create innovative business and product solutions, driving stronger performance and shareholder return.

Our company treats all associates and applicants equally according to their individual qualifications, abilities, experiences and other employment standards. Timken does not tolerate discrimination due to race, religion, color, national origin, gender, age, sexual orientation, gender identity, disability, veteran/military status or any other legally protected trait.

Additionally, our company does not tolerate harassment, regardless of where it takes place. It is prohibited on Timken premises, as well as in off-hours or off-site business-related functions, such as business travel or company events.

As associates, we share the responsibility of keeping our work environment free of harassment and discrimination. Our supervisors and managers have a duty to act if they are aware of such behavior. If you observe conduct that may constitute harassment, you have a responsibility to report the matter to your supervisor or manager or another one of the ethics reporting resources.
Harassment Defined
Harassment includes any unwelcome conduct. It creates an intimidating, offensive or hostile work environment, or unreasonably interferes with someone’s work. Sexual harassment includes unwelcome sexual advances, requests for sexual favors or other physical or verbal conduct of a sexual nature.

Harassment can take many forms, including physical actions, spoken and written remarks, and videos or pictures.

Q: Quentin feels uncomfortable around his supervisor, Nancy. Nancy often makes lewd remarks to him and comments frequently on his appearance. Quentin tells Nancy that her advances are unwelcome, but she laughs and says she’s just teasing him. Quentin is fed up with the harassment, but doesn’t know what to do. Would anyone believe that his supervisor was acting this way?

A: Timken leaders are expected to act as role models – which is why Quentin should speak up when one isn’t. Nancy’s behavior is clearly inappropriate and unprofessional. It doesn’t matter that she’s Quentin’s supervisor – he needs to tell someone about her comments. In this case, he should reach out to his local organizational advancement/human resources representative, or another ethics reporting resource with whom he feels comfortable. Quentin can feel safe reporting this harassment – Timken will protect him from retaliation.

Wage and Hour Laws
We comply fully with applicable wage and hour laws. We expect our supervisors and managers to be leaders in this area of compliance.

To help our company comply with these laws, associates who are required to track their hours worked must maintain accurate records of those hours.

In addition, supervisors and managers are expected to ensure time records accurately reflect hours worked. They must be certain our company complies with all overtime and maximum hour laws and regulations, and applies any exemptions from such wage and hour requirements in good faith. Further, our supervisors and managers have a duty to enforce child labor laws throughout our global operations. They must be familiar with not only national wage and hour laws, but also state and local laws that might affect our operations.
Environmental, Health and Safety Policy

Our company has a global policy to operate safely and responsibly to protect our associates, our suppliers, our customers, the communities where we operate and the environment. We are committed to continuously improving our environmental, health and safety (EHS) performance. By doing so, we will create a safe and healthy workplace, take responsible care of environmental resources and develop sustainable technologies and business practices that contribute to global economic growth and prosperity.

Every Timken associate is responsible for understanding and supporting this policy and the following objectives:

• Comply with all EHS laws, regulations, company policies and standards and require the same from our suppliers.

• Make EHS performance a priority in our business and operations planning and decision-making. We are guided by our core value of ethics and integrity to do what is right.

• Expect associates and contractors to always conduct their activities safely and responsibly. We help them do this through education and training.

• Be diligent in identifying and assessing risks and potential hazards that can affect our environmental, health and safety performance and be quick to take corrective action.

• Support environmental sustainability through pollution prevention, waste management, recycling, energy conservation and energy-saving product innovations in friction management and power transmission.

• Measure and assess our progress toward our EHS objectives and communicate this regularly to interested stakeholders.

We expect managers to provide the leadership for delivering on our EHS objectives. Likewise, we expect every Timken associate to contribute through decision-making and actions that are consistent with these objectives. If you become aware of any activities that are in conflict with this policy, report the situation to your supervisor, manager or any of the ethics reporting resources.

Additional resources:
- Corporate environmental, health and safety
- Your plant environmental or safety coordinator
- Global environmental, health and safety policy
- Environmental, health and safety website
- Medical services
- Ethics reporting resources

Q: Sam and his team had some trouble degreasing bearings that needed repair. A supplier tells Sam that they can provide a free sample of a much stronger degreasing solution. Sam responds that our policy is to conduct a safety review first. The supplier says that Timken only reviews purchased chemicals and not free samples. Sam doesn’t feel right about this. What should he tell the supplier?

A: Sam is correct – our policy is to review any chemicals before we use them, regardless of whether they are “free samples.” The solution may not be safe, and a material safety data sheet (MSDS) is necessary to review its ingredients. If the chemical was spilled or caused an injury to an associate, our emergency response teams could not properly respond without the MSDS. Sam must refuse the sample until a proper safety review can be conducted.
Drug- and Alcohol-Free Workplace

Our company values the health and safety of all associates. Performing work under the influence of drugs or alcohol imperils your health, safety and well-being. Being under the influence of such substances can put you and those around you at risk. It can also interfere with your ability to do your job safely and efficiently.

We may not use, be under the influence of, possess or distribute illegal drugs, controlled substances or alcohol while on company premises or when conducting company business. This also applies to lawfully prescribed medication, if such use may impair our ability to perform our jobs, or poses a direct threat to ourselves or others in the workplace. For these reasons, our company maintains a drug-and alcohol-free workplace. The only exception to this policy arises when we consume alcohol at authorized work-related events. In such cases, we may only consume the alcohol in moderation and must maintain professional behavior.

Anyone suspected of possessing alcohol, an illegal drug or a controlled substance during working hours is subject to inspection and search, with or without notice. This applies while on Timken’s premises during work hours, or at any other location while conducting business on behalf of Timken.

You are encouraged to notify your supervisor or manager if you have reason to believe illegal drugs, controlled substances or alcohol are being used on premises or in the conduct of Timken business.

For information about accessing community drug and alcohol abuse programs, rehabilitation and assistance programs, please contact a medical services representative or our Employee Assistance Program.

Additional resources:

• Drug and alcohol policy
• Your plant safety coordinator
• Corporate health and safety
• Medical services
• Employee Assistance Program
• Ethics reporting resources

Workplace Violence

Our company is committed to providing a safe workplace for everyone. Treating one another with professionalism, dignity and respect means we do not tolerate or engage in any type of workplace violence.

Part of maintaining a safe, respectful workplace means never making threats or engaging in violent, threatening or intimidating behavior. This includes aggressive or hostile behavior that creates a reasonable fear of injury to another person. Weapons, including lawfully licensed firearms, are not permitted on company property, or while on company business.

If you feel threatened by someone’s behavior, you should immediately report it. Even if made in a seemingly joking manner, words or actions that make you feel unsafe need to be disclosed. If you or someone you know is in immediate danger, call local law enforcement authorities right away. Then, report the incident to your supervisor or manager, or by using the ethics reporting resources.

Additional resources:

• Associate relations
• Your plant safety coordinator
• Corporate health and safety
• Medical services
• Workplace violence policy
• Ethics reporting resources
Data Privacy

We are committed to protecting the security and confidentiality of the data people entrust to us. This includes the data provided by our fellow associates, as well as information we receive from our customers, suppliers and other third parties with whom we do business.

Our company complies with all applicable data protection and privacy laws. We share a responsibility to protect the privacy and security of any personal information collected, stored, processed, transmitted, shared or disposed. “Personal information” includes the data contained in our personnel records, medical records and credit or banking information.

You should never share personal information with others who do not have a company business need to know. Never leave personal information about yourself or others — such as performance management documents, salary information, expense reports or medical information — unsecured on a desktop or smartphone or in any accessible location.

Electronic Communications Systems and Expectations of Privacy

Our electronic communications systems are essential business tools that help us work efficiently and productively. These systems include:

- Computers
- Electronic mail
- Instant messaging
- Internet
- Intranet
- Blogs
- Social networking sites
- Wikis
- Interactive sites
- Facsimile (fax)
- File transfers
- Electronic data interchange
- Audio and video teleconferencing
- Voice mail
- Telephone systems
- Cellular phones
- Pagers
- Personal data assistants

We are committed to using these systems professionally and appropriately within the scope of our jobs. Our electronic communications systems, including all data or information they contain, are company property. When using company electronic communications systems, our activities should be conducted according to our Standards of Business Ethics. This includes treating people with dignity and respect and avoiding any appearance of impropriety.

Our company recognizes you may need to reach a family member or other personal contact while at work. Reasonable personal use of our company’s electronic communications systems is permitted. However, such use must not interfere with company business, relate to a personal business venture or violate any company policy.

Social media can sometimes blur the line between professional and personal activity, including social networking sites, blogs, wikis, chat rooms and forums. We must ensure that our personal participation in social media does not create risks to our company’s reputation, taking care to protect proprietary or confidential information. Further, social media should never be used to defame or harass other associates, customers, suppliers, competitors or others with whom we do business. Keep in mind that information sent or received using any of our company’s electronic communications systems is not private. Activity may be monitored to ensure these resources are used appropriately. Timken also reserves the right to block access to websites, as well as the transmission of emails or files.

Additional resources:
- Organizational advancement
- Associate relations
- Electronic communications policy
- Ethics reporting resources
TURNING ETHICS INTO ACTION
FOR OUR CUSTOMERS

At Timken, *Turning Ethics into Action* for our customers means:

• We produce products that meet our quality standards.
• We speak up if we discover an actual or potential product quality or safety issue.
• We deal fairly with our customers.
• We make only those commitments and promises that we can keep – and we honor them.
• We do not make untrue, unfair or misleading statements about our or our competitors’ products.
• We comply with applicable legal and ethical requirements in our dealings with customers everywhere in the world.

Fair Dealing, Promotion and Advertisement

We work fairly and honestly with our customers. We earn their business through the performance of our products and services and our ability to fulfill commitments. We follow through on our promises and honor our contractual obligations.

We compete solely on the merits of our products and services and promote them accurately and honestly. This means we do not make false or misleading statements or innuendo about our competitors, their products or their services. Comparisons of our products or services with those of our competitors must be accurate and supported by facts.

We do not offer our customers – or their employees – benefits, rewards or things of value that may violate the law, the customers’ policies or our business practices. If you offer a gift or entertainment to a customer, it must be nominal, customary, infrequent and legal. Its public disclosure should not cause embarrassment to you or to Timken.

In addition, we never use illegal or unethical methods to gather competitive information.

**Additional resources:**

- Gifts and entertainment policy
- Legal services
- Communications
- Ethics reporting resources
Product Quality

Our Timken brand is respected across the world. Our products are used in a wide variety of demanding applications and customers trust us to provide products of high performance and consistent quality. That means each of us has to diligently follow our total quality management system and act with integrity, from design to manufacturing to distribution of our products.

- Ensure all new products satisfy appropriate company standards and agreed customer requirements.
- Follow all product specifications.
- Adhere to production processes and quality control procedures.
- Comply with all applicable product laws, regulations and industry standards governing product and process specifications.
- Conform to all product storage, handling and shipping policies and procedures.
- Employ monitoring systems for product and process compliance.

We each share the responsibility to report concerns or suggestions regarding standards or procedures.

**Additional resources:**
- Vice president – quality
- Market or product managers
- Chief engineers
- Facility quality managers
- Director – global quality
- Manufacturing directors
- Packaging or shipping coordinators
- Quality policies and procedures
- Ethics reporting resources

Government Customers

At Timken, we serve government and state-owned entities around the world. We value our relationships with these customers and are committed to complying with all applicable legal and ethical requirements. Associates who support government contracts should be aware that special rules and regulations apply.

When interacting with national, regional or local governments, remember the foundations of government contracting:

- Maintain the highest level of integrity in dealing with government employees.
- Ensure honesty in exchanges of information.
- Develop and maintain proper relationships with third parties.
- Promote openness and fairness in competition.

Associates should reference the *Standards of Business Ethics Supplement for Government Business* and the *Turning Ethics into Action in Our Global Community* section of this policy for additional compliance requirements related to government customers.

Additionally, associates who contact elected or appointed national, regional/state, local or other officials and employees to promote products or services for sale to a government agency, or to seek government assistance such as grants or incentives, should first contact the Office of Government Affairs at govtaffairs@timken.com.
Anya’s team recently received a government subcontract that stipulates all products must be made entirely in that government’s country. Anya doesn’t believe all of our products will comply, but the purchasing agent tells her the government doesn’t really pay attention to that requirement. He goes on to say that we can use a non-compliant product without the government noticing. This seems wrong to Anya.

How should she proceed?

Anyà’s instinct is correct – it is wrong for our company to supply products that do not meet the requirements of a contract or subcontract. If we give our word that the product meets the content requirement, that is the only product we will provide. If we cannot provide compliant product, we cannot agree to sell it. Anya should inform the purchasing agent of this standard and work toward a solution that honors our contractual agreements.
At Timken, *Turning Ethics into Action* in the marketplace means:

- We do not discuss with competitors prices or price-related information, information related to bids or proposals, the division or allocation of markets, or our business dealings with any third party.
- We obtain competitive information legally and ethically.
- We deal fairly with our suppliers and business partners.
- We provide truthful information to our suppliers and business partners.
- We respect the intellectual property rights of others.

**Antitrust and Competition Laws**

We believe in free and fair competition. The majority of the countries where we do business prohibit anti-competitive collusion between competitors and abuse of a dominant position (known as “monopolization” in the United States). They also prohibit agreements with customers and suppliers that impose unreasonable restrictions on their commercial independence. We must comply with applicable antitrust and competition laws in all countries where we do business. In doing so, we ensure that our customers have access to quality products and services at fair prices.

It is important to avoid contact with competitors and their employees, except in those limited situations in which contacts are clearly necessary and for a lawful purpose.

It is never acceptable to discuss with a competitor about any of the following:

- Prices we charge for our products
- Terms of sale
- Production output
- Allocation of markets or customers
Gathering competitive intelligence is an important business tool. However, that information should only be collected in legal and ethical ways. Never solicit or accept competitive information directly from any competitor. If you hire an associate who previously worked for a competitor, you must honor any non-disclosure obligations that person may have. You should not accept or solicit the disclosure of confidential competitor information from that associate. Further, you should never hire a competitor’s associate specifically to obtain the competitor’s confidential information. If colleagues, customers or business partners have competitive information they are required to keep confidential, never ask them to share it with you.

If you work in sales, marketing, corporate development, purchasing or any other area of Timken where you may interact with competitors, be sure to review and understand the Timken antitrust guidelines. Before attempting to impose any contractual restrictions on any customer or supplier that would limit their ability to purchase from or sell to our competitors or otherwise restrict their commercial freedom (for example, restricting a customer’s resale prices or sales territory), you should consult with legal services.

Q: Recently, Josue had lunch with his old friend, Rick, who is Josue’s sales counterpart from one of Timken’s competitors. The two used to work together, and decided to catch up on old times. Though they stuck to personal discussion at first, the conversation eventually turned to their current jobs. Rick began to share with Josue his company’s pricing strategy for a new line of power transmission components. Josue tells Rick that they shouldn’t be discussing this information. What else should Josue do?

A: Josue has done the right thing by ending the conversation. However, the issue doesn’t end there. Because competition laws take into account even the appearance of collusion, Josue should make it clear to Rick that this topic is off limits. Then, Josue should report the conversation to legal services. Keeping our company informed of such issues will help us deal with them appropriately – before they become larger problems.

Additional resources:
- Antitrust guidelines
- Legal services
- Ethics reporting resources
Dealing Fairly with Others

We deal fairly with our competitors, suppliers and other business partners at all times. We never use unethical means to secure business, and only make truthful, accurate statements to those with whom we conduct business.

Our company has become not only an industry leader, but also a leader in ethics and integrity based on the quality of our associates and the products and services we offer. Our commitment to fair dealing means that we:

- Supply only honest and truthful information to our suppliers and other business partners.
- Never misrepresent facts in order to gain a competitive advantage.
- Never engage in illegal or unethical conduct when competing.

Additional resources:

- Ethics reporting resources

Intellectual Property Rights of Others

We respect the intellectual property rights of others, just as we expect others to respect our rights. Intellectual property includes trade secrets, copyrights, trademarks and patents, as well as industrial design rights. To respect intellectual property rights, we must follow these rules:

- Honor our obligations pursuant to any non-disclosure agreement and follow similar procedures for how we protect our own information.
- Only use customer confidential information for the purpose the customer specifies.
- Purchase or license all commercial software. Do not copy commercial software unless the software license expressly permits copying.
- Purchase multiple copies of trade journals and other similar periodicals. Do not copy significant portions of such materials unless prior permission has been obtained from the copyright holder.
- License the use of music or videos. Do not use commercial music or video CDs or DVDs in Timken’s business without first obtaining a license or other permission from the copyright holder.
- Seek and obtain permission before using others’ trademarks or logos.

Additional resources:

- Communications
- Intellectual property attorney
- Legal services
- Ethics reporting resources
At Timken, Turning Ethics into Action for our shareholders means:

- We maintain financial records that are accurate, complete and timely issued.
- We maintain a system of internal controls sufficient to provide reasonable assurances that all transactions and access to corporate assets are only undertaken in accordance with management’s authorization.
- We cooperate with internal and external auditors, internal investigations and government inquiries.
- We adhere to record retention guidelines.
- We protect our company’s assets and do not use them for our own personal gain.
- We avoid conflicts of interest.
- We give and receive gifts in good faith and without the intent to influence a business decision.

Accurate and Complete Financial Records

Our shareholders, fellow associates and the public depend on our financial information to make business decisions. In addition, laws and regulations require us to maintain accurate books and records.

We each have a responsibility to ensure corporate records fairly and accurately reflect all transactions and dispositions of our assets in reasonable detail. Never delay a necessary entry or make false or artificial entries in any company books or records for any reason. Further, never engage in or support any act that results in an entry that is not properly supported.

Payments will only be approved and made for purposes described in the documentation supporting the charge. We do not approve or make any payments that are to be used for any purpose other than that described by the document supporting the payment.

Additional resources:

- Finance policies
- Vice president – internal audit
- Chief financial officer
- Controller
- Legal services
- Ethics reporting resources
Cooperation with Auditors, Responding to External Requests

From time to time, our managers, auditors or the government may ask us to provide information. We must take our commitment to comply with these requests seriously.

We are required to fully cooperate and openly communicate with our internal and external auditors. Auditors require full and unrestricted access to personnel, facilities, records and other information to do their jobs. This means we must never attempt to control or influence the free flow of information during the audit process.

Keep in mind that you are not required to obtain permission before speaking to the auditors during reviews. Managers should not question associates about their interaction with the auditors in the context of the reviews. If you believe documents are being concealed, destroyed or altered in any way, you should report your concern using any of our ethics reporting resources.

If you receive a request for company information from an external party, contact legal services.

Additional resources:
• Ethics reporting resources

Public Reporting and Communication

Because our company is publicly traded, we must file reports and other documents with the Securities and Exchange Commission (SEC) and the New York Stock Exchange. It is also important that we speak with one clear, consistent voice. For this reason, only authorized company spokespersons may issue press releases. The same is true of other public statements that include financial and other information about our company’s business, financial condition and results of operations.

We have a responsibility to ensure all disclosures in public reports and documents, including those filed with or submitted to the SEC, are full, fair, accurate, timely and understandable. Each of us, including our company’s chief executive officer, chief financial officer and senior leadership, has a role in establishing and maintaining adequate and effective disclosure controls and procedures. Therefore, we must always provide reliable and accurate information and otherwise support appropriate disclosure practices.

If you are asked to provide, review or certify information, do so in a full, accurate and timely manner. Even in the absence of a specific request, be sure to report to your management any information you believe should be considered for disclosure in Timken’s reports to the SEC.

If you receive a request from an analyst or member of the media, forward it to the communications department.

Additional resources:
• Communications
• Investor relations
• Chief financial officer
• Ethics reporting resources
Inside Information

Our company’s stock is publicly traded on the New York Stock Exchange. As Timken associates, we may have access to or become aware of information about our company that has not yet been disclosed to the public. This information is known as “material non-public information,” or “inside information,” and is strictly governed by federal and state laws.

Examples of material non-public information include:

• Information about changes in senior management
• Plans related to mergers, acquisitions or divestitures
• Pending or threatened litigation
• Financial results before they have been released to the public
• New product development

We may not buy or sell company stock at any time while in possession of material non-public information regarding our company. This applies both to our company’s stock and to stock for companies with which we do business. We must never use that information to recommend the purchase or sale of company stock to others. Additionally, certain associates are limited to trading company stock during “window periods” following the public release of the company’s quarterly earnings. These associates are notified each quarter.

Additional resources:
• Policy regarding trading in stock
• Ethics reporting resources

Record Retention

We are committed to maintaining our records in accordance with all legal and business requirements. All records should be either retained or destroyed according to our record retention policy.

In some cases, documents we possess may relate to pending or threatened investigations, lawsuits or other proceedings. These documents must be maintained and may not be altered or destroyed. If you receive a notice that you may have documents that are subject to a legal hold, follow the instructions in the hold notice. Do not destroy the documents identified.

Additional resources:
• Record retention policy
• Office services
• Legal services
• Ethics reporting resources
Company Assets

We each share a responsibility to protect Timken’s assets. These include our facilities, equipment, materials, property, technology and information.

Our company provides access to many assets, both tangible and intangible. Such assets should be used only for company purposes. However, our company recognizes that occasions arise where you may need to contact a family member or other person while at work. Therefore, reasonable personal use of our company’s electronic communications systems is permitted. Such use must not:

- Interfere with company business
- Relate to a personal business venture
- Otherwise violate this policy or any other policy of the company

Any personal use of the company’s electronic communications systems and resources must be “incidental” as defined in the electronic communications policy.

Timken’s proprietary and confidential information is one of our company’s most important assets. “Proprietary and confidential information” generally includes non-public information that, if revealed, might benefit our competitors. Examples include specific technical, design or process data; pricing information; business plans; acquisition or teaming plans; project practices; customers and supplier lists. We share the responsibility of keeping such information secure at all times.

The Timken trademark and other company-owned trademarks and brand identifiers may only be used in compliance with Timken’s branding policy.

Additional resources:

- Communications
- Legal services
- Electronic communications policy
- Ethics reporting resources

Q: Jillian and Marc work together at Timken, and are also friends on Facebook. The two will occasionally comment to one another about a stressful workday, but most conversation is personal in nature. However, Marc notices one evening that Jillian has posted an update about an in-progress contract. She wrote, “On the verge of closing the deal of a lifetime!” and included the potential customer’s name. Marc doesn’t think this is okay, but doesn’t want to tell Jillian how to act in her personal life. Should Marc stay out of this?

A: No. While Jillian can speak freely in her personal life, she has a duty to Timken — and her fellow associates and customers — to maintain the confidentiality of information she receives as part of her job. By sharing this information in a public place, Jillian puts herself and Timken at risk. If anyone were to trade on such information, she and Timken could be held liable for insider trading. Marc should encourage Jillian to remove these details from her profile, and let her supervisor or manager know.
Conflicts of Interest

As part of our commitment to act in the best interests of our company, we should always avoid conflicts of interest. A conflict of interest occurs when our private interests or actions interfere – or even appear to interfere – in any way with the interests of our company. Conflicts commonly arise in situations such as:

- Exchanging gifts and entertainment
- Conducting business with or supervising family members or friends
- Participating in outside business interests or employment outside of our company
- Taking personal advantage of corporate opportunities that our company might be interested in pursuing

We have a duty to carry out our responsibilities with the utmost respect for and loyalty to our company. In fulfilling this duty, we must avoid situations that create actual or potential conflicts in which our actions or loyalties are divided.

If your job responsibilities include buying or leasing materials and services on behalf of Timken, you must do so objectively. Never accept or seek any benefit from a supplier or potential supplier that would appear to compromise your judgment.

To preserve the best interests of our company, we must never:

- Hold a significant financial interest in one of our company’s customers, competitors or suppliers
- Enter into personal transactions with our customers or suppliers on terms other than those generally available to the public or our company’s associates
- Invest in customers, suppliers or competitors that are not publicly traded
- Make or receive a loan or credit from any of the company’s customers, competitors or suppliers or from a director, officer or associate of a customer, competitor or supplier, other than in the ordinary course of our company’s business
- Engage in any other non-company-related activities during our work hours, or use company supplies or equipment in other employment or activities

Additional resources:
- Conflict of interest policy
- Legal services
- Ethics reporting resources
Giving and Receiving of Gifts and Entertainment

In the marketplace, gifts and entertainment are courtesies designed to build goodwill between companies. They foster positive working relationships between our company and our customers, vendors and suppliers. Conflicts may arise, though, if gifts are offered with the intent to influence a business decision.

In general, we may offer or accept normal sales promotion items, occasional meals or other non-cash items of minimal commercial value. However, it is not acceptable to provide or receive gifts, favors or entertainment if doing so will create or appear to create an obligation. Likewise, you should not offer gifts, favors or entertainment with any expectation of reciprocation. Giving or accepting bribes, inappropriate, lavish or repeated gifts or other benefits is always prohibited, even if acceptable according to local customary practices.

Q: Dominic works closely with several Timken suppliers. One of these suppliers recently held a customer appreciation golf outing. A random drawing was held for a week’s vacation in Hawaii, and Dominic won. Is it appropriate for him to accept?

A: It’s important for Dominic to discuss this with his supervisor or manager before accepting. Depending on how many customer representatives attended and how the drawing was conducted, the prize may be acceptable. However, if accepting the prize will affect Dominic’s judgment and relationship with this supplier, it creates a serious conflict of interest. The same is true if the prize negatively affects Timken’s image – especially to other suppliers.

You may not request or solicit gifts or services, or request contributions from customers, suppliers or other business partners for yourself or for Timken, with the exception of charitable organizations the company supports. Consider the following guidelines when giving and receiving gifts and entertainment. They should:

• Be consistent with accepted business practice
• Be of nominal value
• Be in good taste
• Be infrequent
• Be unsolicited
• Not embarrass you or the company if they were publicly disclosed
• Not be in the form of cash or cash equivalents

If you are offered an inappropriate gift, you should decline it. If doing so would cause you or the company embarrassment, you may accept the gift but then immediately report it to your supervisor or manager, as well as legal services for help in determining an appropriate course of action.

Additional resources:

• Ethics reporting resources
At Timken, *Turning Ethics into Action* in the global community means:

- We deliver our products and services in compliance with international trade laws.
- We conduct business on our own merits and do not engage in corrupt business practices such as bribery or extortion.
- We participate in strengthening our communities.

**Export Controls**

We deliver our products and services to countries throughout the world. As a result, our activities are governed by international trade laws. These laws, including export laws and regulations, are established country by country. They are similar in many ways due to several international organizations and treaties. In fact, many of the export and import or customs laws and regulations tend to be similar between the countries in which Timken operates. It is important that we know and follow such laws in all of our trading activities.

We are responsible for complying with local laws in the countries where we do business. As a U.S.-based company, we must also comply with a number of U.S. laws in our operations outside of the United States. Take the following steps to comply with international trade laws:

- Use our enterprise resource planning (ERP) system for business transactions.
- Conduct “arm’s length” business transactions where the parties act independently.
- Ensure documentation is accurate, complete and transparent.
- Know and validate your transaction.

More information on the following topics is available on TimkeNET:

- Restricted party screening
- Export-controlled products (munitions)
- Duty-free programs (NAFTA)
- Country of origin
- Import and export classifications
- Using the ERP system and Tradesphere
- Frequently asked questions and contact lists

**Additional resources:**

- Import policy
- Export policy
- Global trade compliance
  - Customs
  - Export and license requests
- NAFTA origin certificates, manufacturer’s affidavits, Free Trade program certificates
- Shipments on compliance hold
- Global trade and compliance website
- Desk reference guides
- Ethics reporting resources
Embargoes, Sanctions and “Prohibited Parties” Lists

In addition to export and import laws, our company is also subject to laws and regulations that prohibit us from doing business in certain countries, and with certain entities and individuals that may be connected to terrorism or similar illegal activities. Currently, those countries where we cannot conduct business – directly or indirectly – include Iran, Cuba, Syria, North Korea and Sudan. In addition, countries under an arms embargo by the U.S. government, where no military products or services may be provided, must be avoided. Finally, several “prohibited parties” lists are maintained, showing us with whom we cannot conduct business. These lists change daily, and can be found on the global trade and compliance website.

Prior to shipping, check with your local export manager or the manager – global trade and compliance for further information about our business systems and screening transactions against these lists.

Additional resources:
- Global trade and compliance website
- Manager - global trade and compliance
- Desk reference – Embargoes and Sanctions
- Ethics reporting resources

Boycotts

Because Timken is a U.S.-based company, we must follow U.S. laws and regulations that prohibit boycotts not sanctioned by the United States. A “boycott” occurs when one person, group or country refuses to do business with certain people or countries. If you receive or think you may have received a boycott request, notify legal services immediately.

U.S. law prohibits us from participating in restrictive trade practices or boycotts imposed by foreign governments against certain other countries or against any U.S. citizens or companies. The law requires us to report certain requests to comply with boycott-related requirements. If you become aware of one or more requests for prohibited activities, notify the manager – global trade and compliance, immediately. Failing to report such demands or requests to the U.S. Office of Boycott Compliance can result in severe penalties, so please be sure to report any questionable activity to legal services.

Additional resources:
- Boycott policy
- Manager – global trade and compliance
- Ethics reporting resources
Corruption and Bribery

Part of our commitment to our core value of ethics and integrity means we never engage or participate in corrupt business activities, including bribery. Nearly every country in which we do business has adopted anti-bribery or anti-corruption laws. We must abide by all such laws. This includes the U.S. Foreign Corrupt Practices Act (FCPA), which applies to all of our units and subsidiaries around the world.

We may not offer, promise, give or authorize the presentation of anything of value, either directly or indirectly, to anyone for the purpose of obtaining an improper business advantage.

Anti-corruption laws are generally stricter when it comes to government officials. Government officials are subject to local anti-bribery and ethics laws and regulations that may limit the gifts, entertainment and other items of value they are permitted to accept. It is important that we not take any action that violates these laws or regulations. For a more detailed explanation of who could be labeled a government official, please consult the Foreign Corrupt Practices Act frequently asked questions guide.

When dealing with certain government officials, we may be asked to make facilitating payments. “Facilitating payments” are small sums of money or gifts, generally given to low-level government employees. They are made to facilitate the performance of a routine governmental action, such as processing an application for a permit, license or other official document. Most countries prohibit facilitating payments and Timken rarely allows for them. If you encounter a situation where a facilitating payment is sought, you must obtain prior approval from legal services before making the payment. The only exception to this policy is where the health or safety of a person is at risk. In this case no prior approval is required and the payment should be reported to legal services as quickly as possible. Payments only will be approved and made for purposes described in the documentation supporting the expense. When internal and external auditing is necessary, full cooperation is expected.

“We cannot bribe a government official to gain or to maintain business or to secure an improper advantage. We must maintain financial records that accurately reflect the uses of our funds and a strong system of internal accounting controls.”

Our company’s anti-bribery policy must be followed regardless of the monetary value of the item proposed or intended to be given. We may not use personal funds or money from third parties to circumvent the requirements of our policy or the law.

We have a commitment to comply with anti-bribery laws, and expect our business partners to do the same. Therefore, we conduct due diligence prior to hiring a third party such as a sales agent, or entering into a transaction such as a merger or acquisition. If you are hiring a sales agent, contact legal services for assistance with this process. A higher level of due diligence is required for third-party intermediaries or consultants who claim to have influence with government officials or with whom you believe will exert improper influence to win a government contract.

Our company maintains a system of internal controls. These controls provide reasonable assurances that all transactions and access to corporate assets are only undertaken in accordance with management’s authorization. Finally, we each have a responsibility to ensure that corporate records fairly and accurately reflect all transactions and dispositions of our assets in reasonable detail. Never make false or artificial entries in any company books or records for any reason. Do not engage in or support any act that results in such an entry. By following these guidelines, we ensure our company continues to operate to the highest standards of ethics and integrity.

Additional resources:
- Foreign Corrupt Practices Act frequently asked questions guide
- Ethics reporting resources

Q: Vanessa works in sales at Timken and is submitting a proposal to a government-owned company outside of the United States. Her contact suggested that a cash payment would grant her proposal higher consideration. He told her that a personal contribution of $800 would almost surely win Timken the contract. Vanessa doesn’t want to put her integrity on the line, but really needs this contract. Can she make the payment, as long as she doesn’t use Timken funds?

A: Absolutely not. Our company’s competitive standing is important, but not at the cost of our integrity. An employee of a government-owned business is considered an official, and any payments made to this individual to influence a business decision are strictly prohibited by company policy and the law. Vanessa must not make such a payment, even with her own funds. She should only attempt to win the contract fairly and lawfully. In addition, she should follow up with legal services to document the request for payment.
Political Contributions

Decisions made within political systems around the world can significantly affect our company, associates and shareholders. As such, we have a corporate responsibility to be actively involved in the political process. At times, our company may take positions on political issues and lobby on behalf of our interests and goals in the countries in which we operate. However, our participation in the political process is always lawful and ethical.

Our company encourages all of us to be involved in the political processes in the communities where we live and work. However, we may not use company resources or assets for personal political activities. In addition, our company does not offer reimbursement for personal political contributions.

Contributions from Timken funds may not be made, directly or indirectly, to any political candidates or political organizations unless permitted by U.S. law and approved by the general counsel. Contributions from company funds are permitted for issue advocacy but all such contributions must be approved by the general counsel and vice president – government affairs.

Additionally, our company maintains strict guidelines related to lobbying. “Lobbying” may occur when contacting any elected or appointed federal; state; county; city or other officials and associates to influence legislation; regulations; enforcement activities; or special programs, projects and incentives on behalf of Timken. You must first contact the vice president – government affairs regarding registration requirements. All Timken lobbying activities and significant contact with government personnel should be coordinated with the vice president – government affairs.

Additional resources:

• Vice president - government affairs and community relations
• Ethics reporting resources
ASSOCIATE RESPONSIBILITIES

Compliance with Our Standards of Business Ethics

We are known as an ethical company because we are committed to doing the right thing in all situations. Our commitment to our core value of ethics and integrity and to Turning Ethics into Action is strengthened by our commitment to our Standards of Business Ethics, company policies and the laws and regulations of the countries in which we conduct business.

Violations of any company policy or the law may carry serious consequences. These include disciplinary action, up to and including termination, and possible civil or criminal liability. Our company retains the right to administer disciplinary action in response to acts of misconduct. All Timken officers and managers are responsible for the enforcement of this policy, and for ensuring associates’ knowledge of and compliance with its guidelines. All Timken associates, directors and agents have the responsibility to fully comply with this policy. Our general counsel holds ultimate responsibility for the interpretation of this policy.

Although the statements contained in this policy pertain to many types of business conduct generally considered to be improper, they do not specifically list every type of misconduct. No single document can. Therefore, if you have any questions or concerns, or are unsure if an action you have observed or engaged in constitutes misconduct, please reach out to any of the ethics reporting resources available to you.

Future or Ongoing Amendments

From time to time, changes to our Standards of Business Ethics or other company policies may be made. All updates to the policy will be posted on our company’s intranet site. We are each responsible for understanding and upholding the policy at all times. Please take the time to review any updates as they are made available.

Any amendment of these Standards of Business Ethics will be reviewed by the nominating and corporate governance committee of the board of directors of our company and will be disclosed publicly, if and as required by law or stock exchange rules.

Applying for Waivers

If you feel a waiver of this policy is necessary or appropriate, including but not limited to any potential or actual conflict of interest, you may submit a request for a waiver and the reasons for the request to the general counsel.

Any waiver of this policy for executive officers and directors may be made only by the board of directors or the nominating and corporate governance committee of the board and will be promptly disclosed in accordance with applicable law and rules of the New York Stock Exchange.

Additional Information and Resources

For more information on ethics- and compliance-related topics, visit the Turning Ethics into Action website from the TimkeNET home page (follow the Ethics Resources and Timken HelpLine link).
CONTACT INFORMATION

Ethics and Compliance Contacts
The ethics and compliance department is a valuable resource for ethics and compliance training, assistance with resolving ethics issues, and reporting incidents. Please email ethics@timken.com or call 234-262-7025 for guidance or to report a problem.

Timken HelpLine Telephone Numbers
The Timken HelpLine is available online and via telephone to report concerns or questions. The HelpLine is answered by an external third party, and all reports will be kept confidential to the maximum extent possible. For more information on contacting the HelpLine, see the Timken HelpLine on Page 7.

ARGENTINA
0800-555-4288-800-846-5363
0800-288-5288-800-846-5363

AUSTRALIA
Telstra 1-800-881-011-800-846-5363
Optus 1-800-551-155-800-846-5363

BRAZIL
0-800-891-0380

CANADA
800-846-5363

CHINA
10-800-711-0640
10-800-110-0584

CZECH REPUBLIC
800-142-847

FRANCE
0-800-90-5354

HONG KONG
800-96-1111-800-846-5363
800-93-2266-800-846-5363

HUNGARY
06-800-011-11-800-846-5363

INDIA
Dial 000-117, then pause.
After the voice, dial or say 800-846-5363

ITALY
800-172-444-800-846-5363
PLEASE NOTE:
If you are not able to reach the Timken HelpLine using the primary phone number(s) listed for your location, dial 1-800-846-5363.

SINGAPORE
Dial 800-011-1111; pause for the instruction to dial again, then dial 800-846-5363

SOUTH AFRICA
001-800-846-53-63

SPAIN
900-99-0011-800-846-5363

TAIWAN
00-801-102-880-800-846-5363

TURKEY
0811-288-0001-800-846-5363

UNITED KINGDOM
0808-234-6354

UNITED STATES
1-888-732-1439
1-800-846-5363

VENEZUELA
0-800-225-5288-800-846-5363

JAPAN
KDDI
001-010-1-800-846-5363

KOREA
00-798-11-004-0083

LUXEMBOURG
800-201-11-800-846-5363

MEXICO
01-800-288-2872-800-846-5363
001-800-462-4240-800-846-5363

POLAND
0-0-800-111-1632

ROMANIA
0808-03-4288-800-846-5363

RUSSIA
In Moscow
755-5042-800-846-5363
Elsewhere
8^10-800-110-1011-800-846-5363
or 8^10-800-120-1011-800-846-5363

VIETNAM
1-800-846-5363

WEBSITE
www.timkenhelpline.com
The Timken team applies their know-how to improve the reliability and performance of machinery in diverse markets worldwide. The company designs, makes and markets mechanical components, including bearings, gears, chain and related mechanical power transmission products and services.